Public Document Pack

Cabinet

Tuesday, 8 July 2025 at 5.15 pm
Phoenix Chamber, Phoenix House, Tiverton

Next ordinary meeting
Tuesday, 5 August 2025 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: 396 250 297 638
Passcode: H5QP6Ly6

Membership

Cllr L Taylor	Leader of the Council
Cllr J Lock	Cabinet Member for Housing, Assets and Property Services
Cllr N Bradshaw	Cabinet Member for Environment and Climate Change
Cllr J M Downes	Cabinet Member for Governance, Finance and Risk
Cllr G Duchesne	Cabinet Member for Parish and Community Engagement
Cllr M Fletcher	Cabinet Member for People Development
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

Committee Administrator: Laura Woon
Tel: 01884234229
Email: lwoon@middevon.gov.uk
This document is available on the Council's Website at: www.middevon.gov.uk

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 5 - 16)*
   To consider whether to approve the minutes as a correct record of the meeting held on 17 June 2025.

5. **Annual Performance Report 2024/25** *(Pages 17 - 48)*
   To receive a report from the Corporate Performance and Improvement Manager on the Annual Performance Report 2024/25.

6. **Corporate Risk Report** *(Pages 49 - 68)*
   To receive a report from the Corporate Performance and Improvement Manager and the Head of People, Performance and Waste on the Corporate Risk Report.

7. **Adoption of the Blackdown Hills National Landscape Management Plan** *(Pages 69 - 348)*
   To receive a report from the Director of Place and Economy on the adoption of the Blackdown Hills National Landscape Management Plan.

8. **Value for Money Report- Traditional Versus Modular Builds** *(Pages 349 - 390)*
   To receive a report from the Head of Housing & Health providing Cabinet with the strategic and policy context supporting the delivery of modular (modern methods of construction, MMC) social housing in the Mid Devon Housing (MDH) Housing Revenue Account (HRA) development programme.

9. **Communications & Engagement Strategy** *(Pages 391 - 430)*
   To receive a report from the Communications and Engagement Manager on the Communications & Engagement Strategy and the Social Media Policy.

10. **Waste Depot Remodelling** *(Pages 431 - 444)*
    To receive a report from the Deputy Chief Executive (S151) Officer on the remodelling of the Waste depot.

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11. **Notification of Key Decisions** *(Pages 445 - 458)*
To note the contents of the Forward Plan.

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Stephen Walford
Chief Executive
Monday, 30 June 2025

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

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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 June 2025 at 5.15 pm

Present Councillors	L Taylor, J Lock, J M Downes, G Duchesne, M Fletcher, S Keable, J Wright and D Wulff
Apology Councillor	N Bradshaw
Also Present Councillor(s)	E Buczkowski, J Buczkowski, L Knight and S Robinson
Also Present Officer(s):	Stephen Walford (Chief Executive), Andrew Jarrett (Deputy Chief Executive (S151)), Maria De Leiburne (Director of Legal, People & Governance (Monitoring Officer)), Richard Marsh (Director of Place & Economy), Simon Newcombe (Head of Housing & Health), Dean Emery (Head of Revenues, Benefits & Leisure), Adrian Welsh (Strategic Manager for Growth, Economy and Delivery), Haley Walker (Leisure Business Manager), Christie McCombe (Area Planning Officer) and Laura Woon (Democratic Services Manager) and Sarah Lees (Democratic Services Officer)
Councillors Online	L Cruwys and G Czapiewski
Officers Online	K Knowles (Operations Manager for Financial Services)

1. **APOLOGIES**

Apologies were received from Cllr N Bradshaw.

2. **PUBLIC QUESTION TIME**

Barry Warren

SHO13A - Cost of Abortive Zed Pods Capital Projects transferred to Revenue - £455,300. This seems to be the loss of a large amount of money which the Council is burying.

Question 1:

How many projects were aborted?

Question 2:
Why was such a large amount expended before the projects were aborted?

SHO01 - A provision of £234k is shown as Housing Rent Error overcharge, which resulted in more than £7 million being wrongly paid by tenants to the Council.

Question 3:
Is this the cost of the team working on this?

Question 4:
If not, what is this amount for?

It is proposed to transfer money from the Housing Maintenance Fund final reserve to cover both these costs (totalling nearly £700,000).

Question 5:
How can failed Zed Pods projects be classed as Housing Maintenance?

Question 6:
Does this transfer mean that ready money will no longer be available for any housing maintenance emergencies that may suddenly occur?

Question 7:
Isn't this just a way to lower the Housing Maintenance Reserve, so the Council can argue that paying back the full tenant overpayments will threaten the Council's ability to maintain the housing stock?

Contract Decision – Mid Devon Housing Build

This contract for the construction of a pair of semi-detached houses in Cullompton has been put out to tender and Cabinet is now being asked to decide to whom the contract should be awarded.

The Council has gone out to tender for a contract to build these houses which is valued at less than £1 million.

Question 8:
Why did the Council give multiple multimillion pound contracts for house builds direct to Zed Pods without going through this tender process?

Paul Elstone

The construction of a pair of 2-bedroom semi-detached properties at Honiton Road, Cullompton is part of this Councils social housing portfolio. This being Housing Revenue Account (HRA) Project Number 51

Under Financial Implication in the Cabinet Report, it says the Housing Revenue Account budget is £600,000 for this project.

Yet the approved HRA Capital Programme 2025/26 onwards, says that the budgeted cost for this project is £387,000.

And the recent ZED POD modular home value for money benchmarking report, put to Scrutiny Committee, says the total cost of the project is £444,854. A very precise figure and despite the development even being started. I have called the benchmarking report fundamentally and fatally flawed because of some very basic and high value calculation errors.

My efforts to have the report fully reviewed and properly audited so Council Members could ensure best value for money have abjectly failed. A lack of response I am disappointed to say that has become the norm for this Council.

The Honiton Road project does not seem to be anything like value for money, especially so given it is traditional build. That it is not so energy efficient and will not receive Homes England and Modern Methods of Construction (MMC) grant funding. Something a Category 2 MMC panel system build could or would provide.

Given such a wide range of cost figures and figures that have been provided by Council officers for the cost of this project, how can this Cabinet make a fully informed decision.

Question 1:
This to ensure they award a contract that truly offers best value for money for the Mid Devon residents overall?

Question 2:
I have previously raised concerns that not all Members of this Council or the public can properly interrogate the real cost of the Councils HRA projects. This given the way project information was being presented or not presented.

As a result, it was agreed by Cabinet to provide the locations of HRA projects alongside project numbers in HRA Capital Project budget report documentation.

Cabinet also agreed to show previous project expenditure amounts.

This enhanced reporting lasted just one quarter and with the HRA Capital Budget - Appendix 4 Agenda Item no longer showing this level of detail.

Will Cabinet ensure this information is reinstated and in advance of all future Council meetings where HRA project cost information is provided?

3. **DECLARATIONS OF INTEREST UNDER THE CODE OF CONDUCT**

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

4. **MINUTES OF THE PREVIOUS MEETING**

The minutes of the previous meeting held on 1 April 2025 were **APPROVED** as a correct record and **SIGNED** by the Leader.

5. DIGITAL TRANSFORMATION- VERBAL UPDATE

Cabinet received a verbal update from the Service Delivery Manager on the Digital Transformation update.

The following was highlighted:

- Cabinet had previously approved the digital transformation of the Leisure Service, the leisure management system and leisure application had been implemented.
- The swimming lesson software was in the early stages of implementation and access control was now out to tender.
- The Leisure Service went 'live' with Flow.
- The database of over 12k customers, the data was imported from an old system with only 6 known errors which were easily remedied (for perspective, companies usually imported with around 600 errors).
- The officers were thanked for their work, the delivery team that had made the project possible and who had worked tirelessly to build the system, in a tight timescale, in order to meet the deadline required.
- The new app was launched on Monday 7 April which had been a great success. Customer feedback had been extremely positive and the ease of the new booking journey had been especially well received. To date there had been 3,570 app downloads.
- Lot 2.2, access control, was an ongoing project. A tender process had taken place in April 2025 however there had not been a successful outcome. With only two applications, neither of which were deemed suitable.
- Lot 2.1, course software, was an integral part of the digital transformation for leisure. This system would mainly be utilised for the lesson programme, of circa 2.4k customers, as well as the running of commercial courses.

Discussion took place with regard to:

- The application was easy to use and rolled out in good time.

6. 2024/25 ANNUAL TREASURY MANAGEMENT REVIEW REPORT

Cabinet had before it a report * from the Deputy Chief Executive (S151) and the Head of Finance, Property and Climate Resilience on the 2024/25 Annual Treasury Management Review Report.

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

- Treasury management was a specialist area that required a number of important indicators to be approved.
- The level of capital expenditure for the year and how it had been funded, either through existing resources or through increasing the funding requirement.

- The Council maintained an under-borrowed position, meaning it was able to use reserves, balances and cash flow to meet that funding requirement without the need for external borrowing.
- The report set out the limits for borrowing, showing that the Council was well within them and the timeframes for the repayment of the existing external loans.
- Investments conformed to the approved strategy and there were no liquidity difficulties. Indeed, healthy returns from investments were achieved averaging 4.89%, helping to invest in service delivery.
- All regulations were adhered to, all policies were complied with and no external borrowing was required.

RESOLVED that:

1. The treasury activities for the year be **NOTED**.
2. That Cabinet recommend to Full Council that the actual 2024/25 prudential and treasury indicators in this report be **APPROVED**.

(Proposed by Cllr J Downes and seconded by Cllr J Wright)

Reason for Decision:
Good financial management and administration underpinned the entire document. The Council's treasury position was constantly reviewed to ensure its continued financial health.

Note: *Report previously circulated

7. 2024/2025 REVENUE AND CAPITAL OUTTURN REPORT

Cabinet had before it a report * from the Deputy Chief Executive (S151) and the Head of Finance, Property and Climate Resilience on the 2024/2025 Revenue and Capital Outturn Report.

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

- The net cost of services charged to the General Fund and the Housing Revenue Accounts (HRA) for 2024/25, subject to Audit Committee.
- The Outturn position for the General Fund was an under spend of £1,547k. This was a major corporate achievement and reflected the hard work and efforts of managers and services during the year.
- The success of securing £33.5m of funding to deliver the Cullompton Relief Road, where previous attempts had failed. This could help facilitate further progress on the Garden Village, J28 enhancement and the reopening of the railway station in Cullompton;
- Increased levels of membership at our leisure centres by over 500 or nearly 9%, driving up income and reducing the £1m subsidy by over £400k;
- Further increased waste collection, both in terms of what was collected and how much collected. This placed the Council as the 11th highest in the country.
- Incredible collection rates for Business Rates (99.8%) and Council Tax (97.6%) – making the Council one of the best in the country.

- Reduced staff turnover and sickness, avoiding recruitment and agency costs previously experienced.
- The HRA position was more challenging due to a number of one off matters that caused an over spend of £1,727k. Those included the implications of the historic rent setting error, the sale of Post Hill and sunk costs on non-viable development sites.
- Despite the HRA over spend, the Council's reserves remained healthy with the General Fund remaining at £2.025m, above the £2m minimum agreed balance as shown in Appendix 3.
- The Capital outturn position showed spend of over £23m, split £8m on General Fund projects and c£154m on HRA housing both existing housing and developing new homes. Of the General Fund spend, £2m was on the initial stages of the Cullompton Relief Road, nearly £1m had been spent on adaptions to housing for disabled residents enabling them to stay longer in their own homes.
- As previously reported, during 2024/25 a historic error was identified in the calculation of Social Rent. Following the Council's self-referral to the regulator, they had issued their judgement which also highlighted the proactive steps being taken to correct the issue. All of the overcharged rents had been corrected and the detailed work required to identify the precise level of tenant refunds was being progressed.

Discussion took place with regards to:

- Clarification around the salary underspend due to the delay in recruitment and delayed usage of contingencies to fund compliance.
- Was the cost of converting St Georges Court final?
- What was driving the deficit in the collection rate forecast?

RESOLVED that:

1. The Outturn achieved in 2024/25 which showed a net under spend of £1,547k (11.8% on the Net Total Expenditure Budget) for the General Fund, and for the Housing Revenue Account an over spend of £1,727k (13.2% on the Total Direct Expenditure Budget) be **NOTED**.

2. General Fund
    a) The Net transfers to or from earmarked reserves for operational purposes of £792k, as detailed in the General Fund Service Budget Variance Reports shown in Appendix 1a and 1b and summarised in Appendix 3 be **APPROVED**.
    b) The balance transfer of the £1,547k General Fund underspend to earmarked reserves as detailed in paragraph 3.5.4.4; retaining the balance of the General Reserve at £2,025k; above the minimum recommended level of £2,000k be **APPROVED**.

3. Housing Revenue Account

a) The net transfers to or from the ring-fenced HRA earmarked reserves for operational purposes of £724k detailed in Appendix 2 and summarised in Appendix 3 be **APPROVED.**
b) The £1,727k Housing Revenue Account overspend to be offset with a draw from the ring-fenced HRA Housing Maintenance earmarked reserve be **APPROVED**.
c) The updated position on the Housing Rents error recovery programme in paragraph 4.7.1 be **NOTED**.

4. The slippage of £17,068k from the 2024/25 Capital Programme to be delivered in 2025/26 or later years as shown in Appendix 4 be **APPROVED**.

5. The procurement waivers used in Quarter 4 of 2024/25, as outlined in Section 7 be **NOTED**.

(Proposed by Cllr J Downes and seconded by Cllr S Keable)

Reason for Decision:
Good financial management and administration underpinned the entire document. A surplus or deficit on the Revenue Budget would impact on the Council's General Fund balances. The Council's financial position was constantly reviewed to ensure its continued financial health.

Note: *
i. Report previously circulated
ii. Cllr J Lock abstained from voting.

8. **SHARED PROSPERITY FUND (SPF) AND RURAL ENGLAND PROSPERITY FUND (REPF): 2024/25 CLOSURE AND 2025/26 DELIVERY**

Cabinet had before it a report * from the Director of Place and Economy on the Shared Prosperity Fund (SPF) and Rural England Prosperity Fund (RESP) and the 2024/25 Closure and 2025/26 Delivery.

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

- The previous Government launched the UK Shared Prosperity Fund (SPF). Those funding sources replaced funding previously available under the European Structural and Investment Funds.
- The successful delivery of the previous SPF and Rural England Prosperity Fund (REPF) programme between 2022 and 2025 was particularly pleasing given that there were significant delays in the previous Government issuing confirmation of funding which substantially reduced the window for delivery. Clearly, despite short lead in times to delivery from the original Government announcements and the diversity and volume of the grants given, the performance on spend and utilisation was exceptionally strong at 99% spend of the REPF programme and 95% of the SPF programme.
- The high percentage of delivery reflected the hard work and effort invested by the Economic Development Team in proactively managing spend, identifying challenges and slippages and ensuring re-allocation of returned or unutilised funding.

- In autumn 2024 the Government would offer an additional year of Shared Prosperity Funding; subsequently it was announced that there would also be an additional year of Rural England Prosperity Funding. This funding now flowed to upper tier authorities, being administered by the County Council on behalf of the Combined County Authority – although it had been agreed that delivery would continue to principally be directed through the District Authorities.
- The Delivery Plan proposals were developed in consideration of the Council's Corporate Aims and Strategic Objectives, drawing also from the previously prepared investment plans submitted to the Government at the beginning of the UKSPF programme. Some projects were proposed to be taken forward by the County Council and others by the District Council. Those proposals had been the basis of the County Council's submission to MHCLG.
- There were a number of restrictions with regard to these funding streams. Importantly funds needed to be spent and projects delivered by 31st March 2026. There was therefore a very short window for delivery from a relatively standing start, which was particularly challenging for projects that needed other approvals such as planning permission. Mindful of the need to turn around schemes quickly, it was proposed that a small grants panel be established on the same basis that the existing Shopfront Enhancement Schemes were currently assessed and as set out within the report. It was proposed that this panel would be able to convene quickly and would determine grant funding requests up to the value of £30k.

Discussion took place with regards to:

- Those able to apply for funding and the rules around this.
- Some grants required those to bid for them that were complicated, would the Council be able to support those that need help?
- To have more robust communication about the funding to ensure more people were made aware.
- The concerns about the lack of local Members on the funding panel.
- Would the Ward Members be informed to support the application?

RESOLVED that:

1. The proposed Delivery Plan for 2025/2026 of the Shared Prosperity Fund (shown in Appendix 1) be **APPROVED**.
2. The proposed Delivery Plan for 2025/2026 of the Rural England Prosperity Fund (shown in Appendix 2) be **APPROVED**.
3. Delegated authority to the Director of Place and Economy, in consultation with the Cabinet Member for Planning and Economic Regeneration, to make non material changes to the Delivery Plans as required to ensure timely delivery be **GRANTED**.
4. Delegated authority to a panel consisting of the Cabinet Member for Planning and Economic Regeneration, the Director of Place and Economy, and two members of the Economic Development Team to determine grant funding requests under £30k be **GRANTED**.

(Proposed by Cllr S Keable and seconded by Cllr J Lock)

Reason for Decision:

The report refers to external funding of £275,813 of UKSPF funding and £244,959 of REPF funding which had been allocated to the District Council based on a formulaic approach. This funding needed to be spent this financial year. The proposals for this financial year had been developed to maximise opportunities for certainty of spend.

Note: *Report previously circulated

9. CULLOMPTON TOWN CENTRE RELIEF ROAD- VERBAL UPDATE

Cabinet received a verbal update from the Director of Place and Economy on the Cullompton Town Centre Relief Road

The Cabinet Member for Planning and Economic Regeneration outlined the following:

- As Cabinet would be aware; there was significant effort and achievement in securing Housing Infrastructure Fund (HIF) monies from Homes England in order to enable the delivery of the long awaited Cullompton Town Centre Relief Road (CTCRR).
- In securing funding and commencing delivery, the Council was able to begin to address long running infrastructure challenges within Cullompton and enable the delivery of additional homes at North West Cullompton and the first elements of new housing to the east of the M5, at the site of the proposed Garden Village.
- Agreements had now been completed with Homes England and Devon County Council in order to allow the drawing down and utilisation of funding. Devon County Council would also continue to act as the Council's delivery partner (as highways authority) in relation to the CTCRR.
- The first phase of works to enable relocation of the Cricket club had completed through works to deliver the new cricket square.
- Devon County Council had completed the acquisition of several land parcels in order to enable delivery of the road. This included the acquisition of the land required from Tesco. Furthermore, several of those transactions occurred before the end of the last financial year – thereby making good use of the funding available from Homes England within the financial year.
- Discussions continued with affected landowners where land interests or compensation still needed to be acquired or finalised;
- Further works was currently underway in relation to the cricket club – with outfield works to complete the creation of the pitch now underway, and;
- Works to refine and finesse the design and engineering components of the scheme were underway in order to get to a fixed design to allow tendering to occur.
- The intention remained to commence the main body of construction works during 2026 with completion and road opening in 2028. However, earlier enabling works were also expected to occur during this calendar year.
- Members would be aware of the positive news shared via the MP's offices regarding the decision to fund the Cullompton and Wellington railwaystations and looked forward to further information on this cascading down from Department of Transport (DfT) and Treasury in due course.
- Positive decision in relation to the J28 Strategic Outline Business Case by Treasury in order to address congestion issues around the junction and wider

town, but also to unlock the next phase of growth for Cullompton – including further delivery of new homes to the east of the M5 and beyond the current cap of 500 homes.

Discussion took place with regards to:

- The timeframe around the planned works to be completed.
- Any foreseeable delays on the project?
- Clarification about the 500 homes open at Culm Garden Village.
- The proposed plans on the railway station.
- The lack of growth over the last 20 years and this needed to happen now to better the lives of the residents.
- Clarification around the Strategic Outline Business Case (SOBC) on Cullompton railway station and any potential delays.

10. STAGE 1 CONSULTATION RESPONSES

Cabinet had before it a report * from the Director of Place and Economy on the Stage 1 Consultation Response.

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

- Area B made up a part of the strategic allocation that lay to the east of Tiverton. The advancement of Area B had stalled until recently when West Country Land started to work proactively across the allocation to secure ownership or options on about 90% of the land making up Area B.
- The Councils planning policy required the completion of a master planning exercise on Area B prior to planning permission. West Country Land had therefore been working collaboratively with the Council to accelerate the production of a masterplan across the area. Together the Council and West Country Land undertook a Stage 1 public consultation between November 2024 and January 2025.
- It set out the number, location and attendance at the consultation events and the number of consultee responses.
- Appendix 1 gave an officer summary of the main issues – set out under the 8 headings asked at the public consultation.
- This report was presented at the Planning Policy Advisory Group (PPAG) meeting on 19 May 2025 at which detailed consideration and discussion was given to the responses made under each of the 8 headings presented at the public consultation.
- A provisional timetable for the next stages in the production of the masterplan were set out in the report including a Stage 2 public consultation on the Area B Masterplan during August / September 2025.

Discussion took place with regards to:

- The configurations of the roads and provisions that were in place.
- No mention of Primary and Secondary School provisions, were they in Area A?

- The Overdevelopment with little consideration for the existing residents of Mayfair and access for those 10 dwellings from Area B not Mayfair.
- The no road traffic access to Mayfair.
- The Completions of the Phase 2 of the A361 road junction.

RESOLVED that:

The comments received at the Stage 1 public consultation (Appendix 1) be **NOTED**.

(Proposed by the Leader)

Reason for Decision:
No budget had been set aside by the Council to support the production of the masterplan. It would largely be funded by the developer including the production of the draft masterplan for public consultation, booking of venues and neighbour consultation.

Note: *Report previously circulated

11. ACCESS TO INFORMATION- EXCLUSION OF PRESS & PUBLIC

The Leader indicated that discussion with regard to the following item, may require the 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 was required because consideration of this matter in public would disclose information falling within one of the descriptions of exempt information in Schedule 12A to the Local Government Act 1972. The Cabinet decided, in all circumstances of the case, the public interest in maintaining the exemption interest in disclosing the information, outweighed the public interest in disclosing the information.

It was **RESOLVED** that the meeting remain in Part 1.

12. CONTRACT DECISION- MID DEVON HOUSING BUILD

Cabinet had before it a report * from the Head of Housing and Health on the Contract Decision - Mid Devon Housing Build.

The Cabinet Member for Housing, Assets and Property Services outlined the contents of the report with particular reference to the following:

- The results of the tendering of the Honiton Road new development contract for the Housing Revenue Account (HRA) and to confirm the award of the contract.
- In the Council's Corporate Plan, Mid Devon Housing (MDH) were investing in completing new development projects to provide new affordable homes within its district.
- The Honiton Road scheme was a pair of 2-bed semi-detached properties built on land adjacent to 1 Honiton Road, Cullompton. This property had significant curtilage with the land and property within HRA ownership.

- Access was relatively restricted to the front and side of the property, consequently it was unsuitable for HGV delivery of modular homes and the scheme would be a traditional build with improvements to the existing access to provide off-road parking for the new and existing properties.
- The allocated budget for the work was £600,000.00 with the build-contract tender submissions below this. The additional budget would adequately allow for pre planning and planning costs alongside HRA management and direct on-costs with some project contingency.

Discussion took place with regards to:

- How many houses had been built in the last 2 years.
- Where and what will be the impacts to the neighbouring residents during the development and how will these be managed?

RESOLVED that:

- The new Honiton Road New Development Contract, to be **AWARDED** to Contractor 4.
- Delegated authority to the S151 Officer (in consultation with the Cabinet Member for Housing, Assets and Property) to complete the associated Honiton Road New Development Contract be **GRANTED**.

(Proposed by Cllr J Lock and seconded by Cllr M Fletcher)

Reason for Decision:
The Housing Revenue Account (HRA) budget for the works is £600,000.00. Further information was provided in the report and as set out fully in Part II Annex A.

Note: *Report previously circulated

13. **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:

- Mid Devon Housing (MDH) Mobility Scooter in Flats Policy had been added to October.

Note: * Key Decisions Report previously circulated.

(The meeting ended at 7.10pm) **LEADER**

Report for:	**Cabinet**
Date of Meeting:	08 July 2025
Subject:	**Annual Performance Report 2024/25**
Cabinet Member:	Cllr Luke Taylor, Council Leader
Responsible Officer:	Matthew Page, Head of People, Governance & Waste Dr Steve Carr, Corporate Performance and Improvement Manager
Exempt:	N/A
Wards Affected:	All
Enclosures:	Appendix 1: Planning, Environment and Sustainability Appendix 2: Community, People and Equalities Appendix 3: Homes Appendix 4: Economy and Assets Appendix 5: Service Delivery and Continuous Improvement Appendix 6: Performance Dashboards Q4, 2024/25

Section 1 – Summary and Recommendation(s)

To provide Members with an annual report on performance against the Corporate Plan and local service targets for 2024/25.

Recommendation(s):

1. **Members review and scrutinise the Performance Indicators and information detailed in this report.**

Section 2 – Report

1.0 Introduction

1.1 The Council's Corporate Plan 2024-28 was adopted in July 2024. It is a strategy that documents, communicates and provides a framework for the delivery of strategic priorities. It provides a shared understanding of what the Council is trying to achieve. This ensures the public are aware of the Council's objectives, and can therefore hold the Council accountable.

1.2 The Corporate Plan has five themes: Planning, Environment and Sustainability; Community, People and Equalities; Homes; Economy and Assets; and Service Delivery and Continuous Improvement. Performance is presented thematically at Section 2 of this report and at Appendix 1-5.

1.3 These thematic areas are the basis of the Council's five Policy Development Groups. For each theme the Council outlines its Aims and a statement of objectives within the Corporate Plan. Performance measures are included for each theme, with targets, baseline data, and other important contextual information. These performance measures are used to manage the performance of the Plan.

1.4 Alongside the performance reporting of the Corporate Plan, the Council also presents data on a wide range of service specific and corporate performance indicators, Appendix 6. This is based upon the Performance Dashboards that the Council has been using since 2023. Corporate Plan indicators are presented in yellow text on the Dashboards. A glossary for the Performance Dashboards is on the Council's website and provides a definition for each performance and finance measure. The definitions aim to provide a fuller understanding of what is being measured and how.

1.5 The Corporate Performance Report is presented to Scrutiny twice per year – the quarter 2 report, and the annual report.

2.0 Performance Analysis for 2024/25

Theme 1: Planning, Environment and Sustainability

2.1 Data on the Council's carbon footprint for 2024/25 will be available in July/ August and will be reported through the quarterly performance report. The carbon footprint for the Council in 2023/24 was 16,454 t CO_2e. Through the Corporate Plan, targets have been set to reduce the carbon footprint to 14,500 t CO_2e by 2027/28.

2.2 "Carbon emissions avoided (renewables and green transport)" is an aggregated indicator, made up of two indicators as outlined. Through generating electricity through solar panels, the Council avoided 88 t CO_2e in 2024/25. This is ahead of the annual target of 50 t CO_2e. Through the use of

electric vehicles in its fleet, the Council avoided a further 21.3 t CO_2e in 2024/25 against an annual target of 10 t CO_2e. This result demonstrates that electric vehicles are becoming embedded and well used as part of our fleet.

2.3 In 2024/25 six electric car rapid charger points were commissioned and installed, two at William Street, Tiverton, two at Forge Way, Cullompton, and two at Market Street, Crediton. The Council exceeded its target of four new charging points in 2024/25, and now hosts 22 charge points on its sites. The charging points were used 5,230 times in 2024/25.

2.4 External funding secured to deliver carbon reduction in the district was £75,378 in 2024/25 against a target of £100k. The Green Enterprise Grants drew in £24,245 funding from a bid to the Heart of the South West Local Enterprise Partnership (Local Growth Fund). Businesses awarded grants invested in energy saving and solar projects, and match-funded the grants by at least 50% or more. Therefore the Council generated over £50k additional value, with over £75k invested to deliver carbon reduction in the district.

2.5 Householder planning applications determined within 8 weeks was 99.5% for the past 12 months, and minor applications overturned at appeal was 0.2%. Both are comfortably ahead of target.

2.6 The Planning Enforcement Policy was adopted in 2024. Alongside this, resources were increased in planning enforcement enabling the team to serve enforcement notices/ prosecute landowners and developers undertaking unauthorised development in order to protect landscape and heritage interests.

2.7 The Council approved a new Local Development Scheme in March 2025. This sets out the timetable for preparing a new Local Plan for Mid Devon. The timetable for the production and adoption of the new Local Plan is based on the introduction of a new plan making system under the Levelling-up and Regeneration Act 2023 and new regulations expected in summer 2025. The timetable will be subject to review once the new plan making regulations have been introduced.

2.8 The Council has approved three biodiversity habitat banks within the district which provides an opportunity for development both within the district as well as across Devon to acquire Biodiversity Net Gain (BNG) "credits". As such, BNG improvements within Mid Devon are currently supporting development in excess of our own requirements resulting in greater than 10% biodiversity net gain delivery.

Theme 2: Community, People and Equalities

2.9 The Council supported the development of five community emergency plans by towns and parishes in 2024/25 (Cullompton, Bradninch, Willand, Nymet Rowland and Tiverton), ahead of the target of four per annum.

2.10 The Council supported the Voluntary, Community, and Social Enterprise Sector secure additional external funding of £253k in 2024/25, against a target of £200k.

2.11 110 homes were made safe under the Housing Assistance Policy in 2024/25, ahead of the annual target (60 for 2024/25).

2.12 There were 162 new subscribers to the Let's Talk Mid Devon platform in 2024/25 (Target for 2024/25 was 400). In the year there were 8,886 visits to the platform, 948 contributions, and an engagement rate of 14.1 %. There are ongoing discussions with services to ensure it is the best platform for their needs and this work will feed into future planning around the platform.

2.13 There were 495 complaints in 2024/25, 93% were responded to within the target timescales, against a target of 85%.

Theme 3: Homes

2.14 29 homes became part of Mid Devon Housing in 2024/25. Performance is behind target (100 homes for 2024/25). There have been challenges in year delivering projects due to delays with third parties. As part of this housing delivery, 8 of the homes were net zero (modern methods of construction) homes (target of 50 for 2024/25).

2.15 In 2024/25, 57 affordable homes (gross) were built/ created in Mid Devon (target of 94 in 2024/25).

2.16 At the end of the financial year there were 536 applicants on the Devon Home Choice waiting list (Band A-C). This represents an increase from 470 in Quarter 1.

2.17 In May 2024, the Council joined with Exeter City Council, East Devon District Council, and Teignbridge District Council to host the collaborative Rent Smart Devon event. The evening saw over 150 private landlords, agents and property professionals from across Devon listen to talks from property related professionals, browse exhibition stands and network with specialist companies covering many aspects of property management, as well as support organisations, available to help smooth the tenancy pathway.

2.18 In 2024/25, 72% of tenants were satisfied with the overall repairs service (target: 70%). This measure is set nationally as part of the Tenant Satisfaction Measures (TSMs).

2.19 Another TSM which is part of the Corporate Plan is satisfaction that the home is safe. In 2024/25, 79% of Council tenants agreed that they felt their home was safe, against a target of 70%.

2.20 Support was provided to 100% of those experiencing homelessness in 2024/25. There was a slight decrease in the number of homelessness approaches in 2024/25 compared to the previous year (771 in 2024/25; 802 in 2023/24), but the complexity of cases is increasing.

Theme 4: Economy and Assets

2.21 In 2024/25, the Council arranged support for 187 events in our town centres, and four tourism events. Both performance indicators performed ahead of target for 2024/25.

2.22 The number of regular traders at the Pannier market was 84% in 2024/25 against a target of 85%, and a quarterly breakdown is provided at Table 1.

Table 1: Regular Traders at the Tiverton Pannier market, 2023/24 to present

Financial Year	Quarter	Regular Traders
2023/24	1	89 %
	2	85 %
	3	88 %
	4	81 %
2024/25	1	87 %
	2	84 %
	3	85%
	4	81%

2.23 The Tiverton Work Hub project was successfully delivered through the Shared Prosperity Programme. The Work Hub will be launched in 2025/26. The Council also supported Petroc with its creation of a state-of-the-art Cotie Business Innovation Centre which provides advanced technology-based facilities also funded through the Shared Prosperity programme. This includes access to innovation space for businesses to meet and work and access the latest technological equipment.

2.24 Businesses supported (non-financial support) was 342 in 2024/25, ahead of the target of 250.

2.25 Works are progressing well with the delivery of the Cullompton Town Centre Relief Road, which is anticipated to start in summer 2026. Land assembly is going well with the acquisition of four land parcels including the Tesco land. A Compulsory Purchase Order process to acquire other land parcels will commence imminently. Works continue to relocate the sports clubs that are

effected by the road. A final Business Case was submitted to Department for Transport Rail last year for the Cullompton Railway Station but the Restoring Your Railway programme was stopped by the new Government, thus affecting the target in the Corporate Plan to reopen the station by 2026.

2.26 The Council has commercial and retail properties available for lease in Tiverton and Cullompton, and also leases space at Phoenix House. 1.7% of the available commercial leases were vacant at the end of 2024/25, performing ahead of target (5%).

Theme 5: Service Delivery and Continuous Improvement

2.21 Staff turnover at the Council for 2024/25 was 16.3%, Figure 2. Performance was ahead of target (17%) and is the lowest staff turnover recorded by the Council since 2020/21.

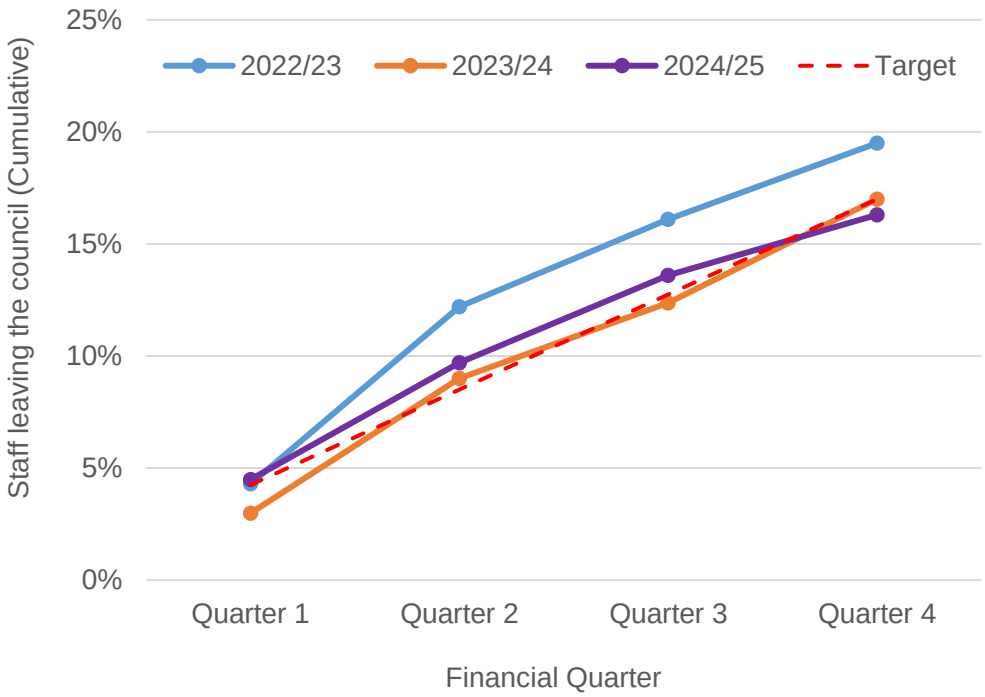


Figure 1: Staff turnover per financial quarter (Cumulative year to date), 2022/23 to 2024/25.

2.22 Levels of residual household waste collected performed very slightly behind target for the financial year, with 300.3 kg collected per household against a target of 300 kg. Performance continues to improve year on year, Figure 2.

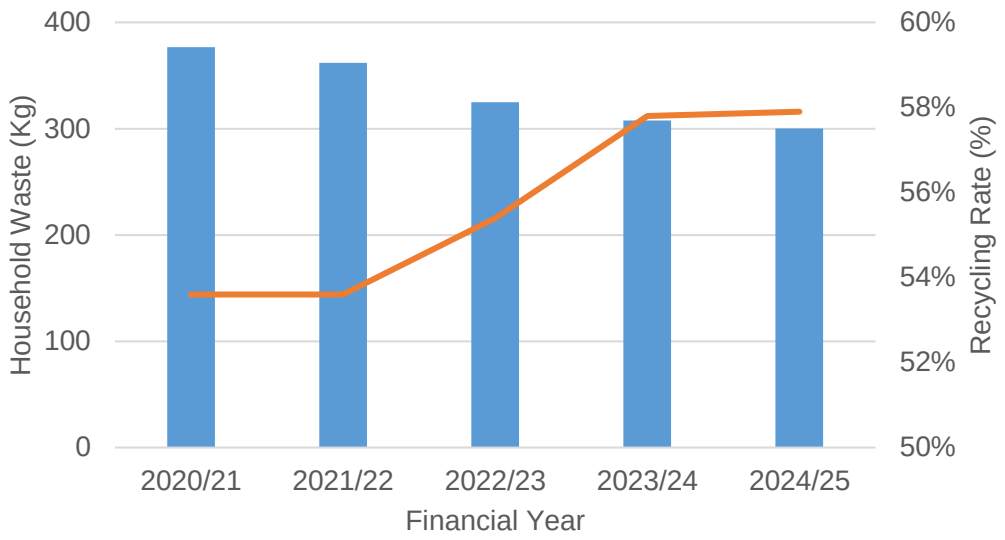


Figure 2: Residual Waste per Household (Kg) and Household recycling rate (%), 2020/21 to 2024/25.

2.23 Household waste recycled in 2024/25 was 57.9% and is behind the annual target (58.5%). This represents a similar recycling rate to 2023/24 (57.8%), however the total waste collected has decreased showing that residents are reusing and reducing their overall waste.

2.24 The total proportion of missed bin collections in the financial year was 0.031%, against a target of 0.03%.

2.25 There were over half a million visits to our Active Mid Devon facilities in 2024/25, representing a cost per visit of 84 pence, ahead of the target of £1.12. This performance represents not only the high number of visits to our centres, but also the associated high levels of income.

2.26 Council Tax collected in 2024/25 was 97.55%, slightly higher than last year (97.51%) and exceeded the annual target (97.5%).

2.27 National Non Domestic Rate (NNDR) collected in 2024/25 was 99.83%, slightly higher than last year (99.4%) and exceeded the annual target (98%).

2.28 “Public survey engagement rate” is a new performance measure. Data was collected from Quarter 2, and shows an engagement rate of 9.4% for 2024/25, behind the target of 15%. This survey is being run against the small number of new processes on the CRM system, and only since August 2024. Once the monitoring has been proven it will be added to each process as it goes live and then cascaded to other services that are not processed through the CRM.

2.29 The overall Council approval rating is measured through the Residents’ Survey. The results of the Residents’ Survey 2024 showed that 51.8% of

residents are very or fairly satisfied with the way the Council runs things. This shows good progress from the 2023 survey (41.1%) and is broadly in line with independent research from LG Inform (56%), although is behind the target set in the Corporate Plan of 70% p.a.

Corporate Indicators

2.30 Staff sickness absence was 7.35 days per FTE for 2024/25 against a performance target of 8.5 days. Sickness absence in the previous financial year was 10.45 days, Figure 3.

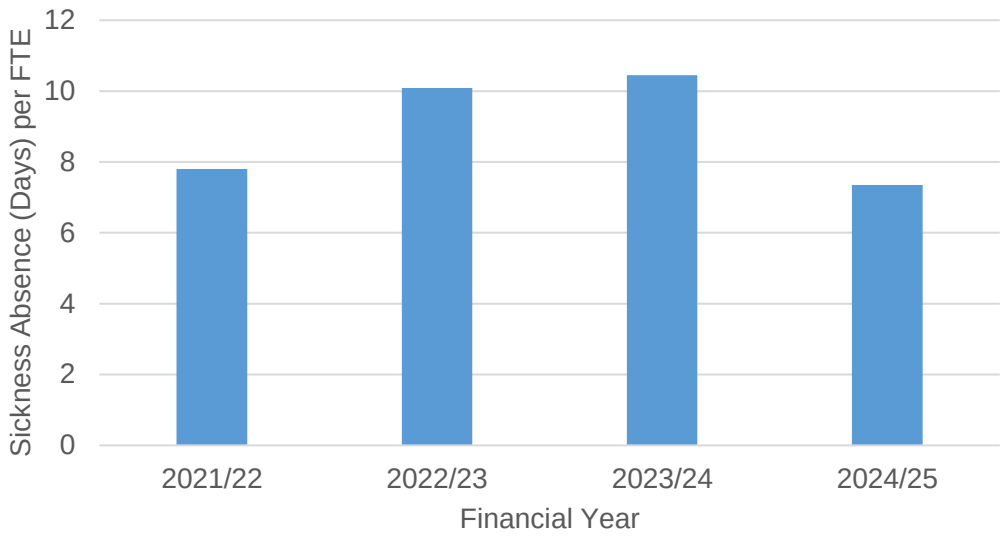


Figure 3: Staff sickness absence (days) per full-time equivalent, 2021/22 to 2024/25.

2.31 Council tax paid by direct debit was 77% at the end of 2024/25 (target of 80%), and Non-domestic rates paid by direct debit was at 49% (target of 50%).

Financial Implications

There are no direct financial implications arising from this report. However, if performance is not at the expected or desired level then resources may need to be reviewed or redirected to improve performance. Policy Development Groups, Planning committee and Cabinet receive Performance Dashboards quarterly. These Dashboards present performance, finance, and risk information together to enable simultaneous consideration of these related aspects.

Legal Implications

There are no direct legal implications arising from this report. However, if the performance of some indicators is not at required levels, there is a risk of legal

challenge. Performance management helps the council meet its duties in relation to Value for Money.

Risk Assessment

If performance is not managed we may not meet our corporate plan targets or take appropriate corrective action. Equally risks may arise which impact the Council's ability to deliver its corporate priorities. Corporate Risks are identified through the Council's Corporate Risk Register and these represent the strategic risks most likely to impact on the Council achieving its corporate priorities.

Impact on Climate Change

The Corporate Plan has numerous aims and objectives that relate to climate change. Given this, several performance indicators reflect our corporate ambition to reduce carbon emissions. Managing the performance of these can help evaluate the impact of Council interventions as well as guide future decisions on spend and investment.

Equalities Impact Assessment

The Council has a duty to understand its residents, user groups and customers. Customer feedback (e.g. complaints) can help the council identify any groups of people who may potentially be experiencing a less satisfactory level of service. When reviewing performance and making recommendations on priorities, the Council should be mindful to consider how services might impact on different sections of the community. The council has reviewed and implemented a revised approach to undertaking Equality Impact Assessments**.**

Relationship to Corporate Plan

Corporate Plan priorities and targets are managed and scrutinised on a regular basis using appropriate performance indicators as detailed in this report.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151 Officer
Date: 25 June 2025

Statutory Officer: Maria de Leiburne
Agreed on behalf of the Monitoring Officer
Date: 25 June 2025

Chief Officer: Stephen Walford
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 25 June 2025

Performance and risk: Steve Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 11/06/2025

Cabinet member notified: Yes

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. 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. No

Section 4 - Contact Details and Background Papers

Contact: Dr Steve Carr, Corporate Performance & Improvement Manager
Email: scarr@middevon.gov.uk
Telephone: 3CX Extension: 4217
Background papers: Corporate Plan 2024-28

Planning, Environment and Sustainability

1.1 Demonstrate climate leadership through achieving ambitious net zero targets

We will take action to reduce our own emissions and attract funding to support our journey towards net zero. This includes further work to lower the carbon footprint from our homes, vehicles, leisure services and land in our management. We will seek support for the adoption and implementation of our Climate Action Plan

- The Council's Climate Change Strategy 2024-2028 aligns with the Corporate Plan 2024-2028. An annual Climate Action Plan (CAP) 'roadmap to 2030' complements the Strategy, aiming to deliver corporate net-zero at the soonest opportunity. Early monitoring shows good progress in line with the CAP target to reduce the annual carbon footprint by 360 tonnes of CO_2 equivalent (tCO_2e) by 2026.

1.2 Support the district's response to the climate emergency

We will continue to work with and support the implementation of the Devon Carbon Plan and look beyond our borders to exchange experience and find innovative ways of lowering emissions, generate renewable energy and increase sustainable travel options. We will provide leadership and support for communities to build resilience and adaptive capacity. We will work with community groups to share best practice, encourage learning and respond to the climate emergency together through partnership working.

- Energy Boost Mid Devon: A partnership project with charity ECOE Advice, launched in April 2025. Mid Devon residents will benefit from healthier homes thanks to independent advice, workshops and retrofit support funded by £45k from the climate and sustainability budget plus a £15k Energy Efficiency Fund to help those who can least afford the home improvements. More energy-efficient homes will have a lower carbon footprint.
- Green Enterprise Grants: Launched in May 2025, offering grants £500 to £5k for small and medium sized enterprises (SMEs), the £30k scheme funded by the Council's climate and sustainability budget will drive local investment and attract match funding to help reduce emissions in Mid Devon.
- The Resilience Officer works with communities on emergency preparedness, which helps to support climate resilience. Many key risks and mitigations identified by Towns and Parishes relate to climate change, as extreme events are predicted to become more frequent or more severe.

1.3 We will work with stakeholders to introduce planning policy which reflects the key issues and challenges facing the district

We will work with communities to bring forward the new local plan – Plan Mid Devon based around our top planning priorities, seeking to encapsulate and reflect the planning ambitions of the Council and its communities. As the Government increases its oversight on planning performance, we will ensure our planning decisions are timely, robust and defendable. We will continue to be a considerate planning authority

- The Council approved a new Local Development Scheme on 4th March 2025. This sets out the timetable for preparing a new Local Plan for Mid Devon. The timetable for the production and adoption of the new Local Plan is based on the introduction of a new plan making system under the Levelling-up and Regeneration Act (2023) and new regulations expected in the summer 2025. The timetable will be subject to a further review once the new plan making regulations have been introduced.
- Decision making on planning applications within Mid Devon continues to significantly exceed national targets, whilst our record of defending appeals against our decision making remains high reflecting robust decision making.

1.4 We will ensure that biodiversity is increased across the district

We will develop and implement our Biodiversity Duty Action Plan across all Council services. Through the planning system, we will encourage developers to exceed the minimum 10% biodiversity net gain, working with local communities where possible, in order to bring real enhancement to nature and landscapes across the district.

- At a national level, a requirement for most new development to deliver a Biodiversity net gain (BNG) of 10% of the original land condition was introduced in 2024. In response, Mid Devon has approved three biodiversity habitat banks within the district (2 of which are currently delivered on site) which provide an opportunity for development both within the district as well as across Devon to acquire BNG "credits". As such BNG improvements within Mid Devon are currently supporting development in excess of our own requirements resulting in greater than 10% BNG delivery required through development management within the district.
- The Biodiversity Duty Action Plan is in place. Goals being implemented include:
  - Early stage reviews of Council land management and opportunities to enhance nature.
  - Consideration of potential to enhance conservation status for key areas, and liaison with managers of special sites such as Local Nature Reserves.
  - Actions to deliver the Local Nature Recovery Strategy (LNRS). Actively involved as the Supporting Authority while the Strategy is in preparation.
  - The Planning team records the number of Consents with BNG secured (and enforcement of action for nature).

1.5 We will value and protect Mid Devon's natural and built environment

We will work with our communities to address environmental damage and will look to prosecute those who cause harm through fly-tipping or littering on public land. We will also challenge those who fail to mitigate environmental impact, liaising with other statutory bodies as required to bring about change. We recognise the importance of the natural and built environment and will work to protect our cultural heritage.

- During 2024/25, The Council increased its planning enforcement resource enabling it to serve enforcement notices/ prosecute landowners and developers that are undertaking unauthorised development in order to protect landscape and heritage interests. Also, Mid Devon has maintained an appropriate level of housing supply allowing it to afford full weight to Local Plan policies intended to protect the countryside from speculative development.

- The work of the Environment and Enforcement service in tackling enviro-crime across the district has resulted in an increase of Fixed Penalty Notice issuance by 75% compared to 2023/24. The service has further built on relationships with external partners to explore tactics to reduce and mitigate environmental crime (partners include the Environment Agency, Devon Authorities and local and rural Policing teams). Social media has been used to encourage community interaction and reporting of key hot spots challenges. In addition, high profile fly tipping prosecutions have been used to highlight impacts and the Council's stance on enviro-crime. A significant level of work has gone into community engagement to resolve local issues, which has seen significant reduction in offences and a greater community stance in supporting the service.

Community, People and Equalities

2.1 We will work closely with town and parish councils

We value and understand the importance and expertise of our town and parish councils. We will seek to develop closer collaborative working relationships through improved communications and engagement, and will measure our performance on this.

- Throughout 2024/25, the Council have been actively working to strengthen relationships with towns, parishes, and local communities to foster greater whole society resilience. These efforts have been implemented through various initiatives, including:
    - State of the District Debate held on 20 March 2024 focused on collaborative working with Towns and Parish Councils
    - Town and Parish Charter adopted by Cabinet (09 July 2024)
    - Annual Meeting of the Parish Clerks held on 20 November 2024, including a presentation on resilience.
    - The Cabinet Member for Parish and Community Engagement has been created, and they have met with those Town and Parish Councils that have requested a meeting to listen to concerns and develop a closer working collaboration
    - Enhancing the communication and dissemination of severe weather alerts to District Councillors and Town/Parishes
    - Participating in Devon Communities Together (DCT) events, such as the Resilience Forum and a local Community Emergency Plan meeting.
    - Engaging with local groups, including attending Tiverton Town Council's Community Engagement Event.
    - Developing a Local Community Risk Register, incorporating risks identified by District Councillors and Town/Parish Councils, scheduled for publication in 2025/26.
    - Supported the development of five community emergency plans by towns and parishes in 2024/25 (Cullompton, Bradninch, Willand, Nymet Rowland and Tiverton)
    - Encouraged Town and Parish Councils to locate and develop an Emergency Hub as a first step towards creating and maintaining an Emergency Plan.

2.2 We value and will work closely with local voluntary, community and social enterprise organisations

We recognise the vital role that voluntary, community and social enterprises play in our district. We will continue to support these organisations development including through the use of grant funding. We will support community events across the district and recognise the importance of youth services.

- The adopted local plan promotes healthy communities through the delivery of social, educational, recreational and cultural facilities and services, access to high quality open space, public rights of way, recreational trails, accessible land and other green infrastructure, and opportunities for sport and recreation and the designation of Local Green Space.

- The Community, People and Equalities PDG are organising a "Meet the Funders" event to be held in Summer 2025 for voluntary, community and social enterprise organisations.

2.3 We will support the health, wellbeing, and safety of our residents

We will ensure that our leisure services continue to help improve peoples' health outcomes. We will keep the public safe through our rigorous public health inspections. And we will continue to enable people to stay in their homes by coordinating housing adaptations. We will work to ensure our places are planned to improve health and wellbeing

- Active Mid Devon have expanded the ways in which we reach our residents through a more active outreach programme including activities such as free wellbeing walks, and helping to set up parkruns in the district.
- Update and ongoing delivery of our Food Safety Plan with focus on interventions at highest risk premises and moving towards full Food Standards Agency requirements across all groups of premises. 94.3% of 747 food business in Good (4) or Very Good (5) under Food Hygiene Rating Scheme.
- Wide range of interventions to protect public health and wellbeing across Public Health functions including ASB Community Protection Warnings and Notices, statutory nuisance actions, Licensing enforcement and interventions alongside enforcement of Private Sector Housing standards
- Successful delivery of Housing Assistance Policy with high number of Disabled Facilities Grant approvals and other support grants plus Home Improvement Loans

2.4 We will support our residents and communities through the cost of living crisis

We recognise the challenges facing people brought about by the cost of living crisis. Through administrating benefit schemes and applying Council Tax Reduction schemes we will support the vulnerable in our communities. We will draw down grant funding to support businesses in our communities through these challenging times.

- In 2024/25, Council Tax rebate applied totalling £4,582,250 to residents on low income. Also, discretionary housing payments totalling £77,202 were awarded and Exceptional Hardship payments totalling £15,186 applied to council tax debts. Housing benefit caseload reduced from 2024 due to Universal Credit migration.
- Our Revenues and Benefits Service help local businesses understand what business rates reliefs they may be entitled to e.g. small business; charitable; retail, hospitality and leisure; public lavatories; community amateur sports clubs. The value of these reliefs in 2024/25 was: £6,057,866 (mandatory reliefs); £87,187 (discretionary reliefs); £2,899,742 (Fully Government funded reliefs).
- The Economic Development team has supported businesses through running a number of grant schemes and facilitating a number of specialist business networks. Economic Development, working with the Council's Climate and Sustainability Specialist, successfully piloted in 2024/2025 a Green Enterprise Grant scheme to support businesses who wish to take action to reduce their carbon and in doing so reduce their costs. This has been launched again for 2025/26. Through Visit Mid Devon, the Council supports a network of

visitor economy businesses, these being predominantly small and micro businesses and include farm business diversification. Utilising UK Shared Prosperity Funding, and working with Food Drink Devon, Mid Devon's food businesses were able to access this specialist business support network.

2.5 We will listen to and respond to feedback

We value all feedback that the Council receives. We will maintain an effective complaints process and ensure that we respond promptly and appropriately. We will ensure that the we consult and engage with stakeholders in an open and transparent manner

- We continue to engage with residents through consultations around Planning, Budget and other areas and provide a digital platform, Let's Talk Mid Devon, to assist with this. The communications team attended the Mid Devon show and supported engagement activities for multiple services. The Customer Services team is also actively embedding a revised code of complaints to meet the requirements of the Local Government & Social Care Ombudsman to evidence effective learning from resident experiences of our services.
- A drive to improve engagement with our residents has seen our engagement platform Let's Talk Mid Devon utilised further. In the past year the platform has gained 162 registrations, been visited 8,886 times and had an engagement rate of 14%.
- The Council also uses social media as a free communication tool and have a total of 25,002 followers across the platforms.
- GovDelivery is the Council's e-bulletin system which is used to send out news stories and service changes directly to our customers who opt in to receive updates. There are 14,420 subscribers who regularly receive bulletins directly from the Council.
- A resident survey was undertaken in 2024 and was open to residents throughout the district. Although the response rate decreased on previous years the survey showed 59.6% of those who responded felt very or fairly well informed about the Council's work, an increase from 52.8% in 2023. We are continuing to explore ways to improve uptake of the survey across the district.
- Many Council services undertake consultations throughout the year, particularly planning, and these consultations can be viewed on our Let's Talk Mid Devon platform. All consultations are shared on this platform as well as through traditional press releases, with town and parishes and online.

Homes

3.1 We will increase the delivery of quality designed, well built homes across the housing market to meet identified needs

Mid Devon does not have enough homes. We will support the delivery of quality new homes built in the district. We will build and expand our own social housing, and encourage the delivery of new affordable homes built in the district.

- The Council is continuing to secure the delivery of new homes in Mid Devon through policies in the adopted Local Plan and through the determination of planning applications. However, it is not directly responsible for building new homes with the exception of new Council homes through the Housing Revenue Account. The number of affordable homes delivered through the planning process will be subject to development viability. The Council has published a Housing Delivery Test Action Plan which details reasons affecting the delivery of new homes across the district and measures that the Council will take to help improve delivery.
- Review and production of our Housing Strategy post 2025 is underway including a focus on new housing delivery. This includes ongoing commitment to a rolling 5-year 500 unit social housing building programme for Mid Devon Housing.

3.2 We will build, promote, and encourage the building of energy efficient and low carbon homes and communities

We recognise that our homes in Mid Devon need to be fit for the future. We will ensure our social housing meets high energy efficiency standards. Through planning and building control we will act so that homes in the district are energy efficient, low carbon, and resilient to climate change.

- Successful implementation of zero-operational carbon, EPC A modular housing schemes to provide new social rent homes within the Council stock. This includes the opening of the St Andrews House scheme in Cullompton, Shapland Place in Tiverton and Crofts in Sandford which provide 19 new units. Number of live modular schemes across Bampton, Tiverton, Hemyock and Willand which will bring forward an additional 45 such units in 2025/26 alongside several traditional build EPC B rated schemes.
- Planning permission in place for a further 22 zero-operational carbon, EPC A modular housing with additional schemes under progress at feasibility, design or planning determination stage.
- Neurodiversity build standards and benefits also built into modular housing schemes.
- Through the preparation of a new local plan we will investigate the introduction of energy and water efficiency standards in new buildings that exceed the national requirements placed through the current Building Regulations.

3.3 We will invest in our homes

We will upgrade our social housing by installing energy efficiency measures and renewable energy. We will maintain our high standards of maintenance across Mid Devon homes. We will monitor tenant satisfaction with maintenance and act on the feedback received.

- Over 50% of our stock have at least one form of renewable technology installed.

- Over £3m a year planned maintenance budget for home improvements.
- 70% overall tenant satisfaction in Mid Devon Housing homes.
- 72% tenant satisfaction with repairs in Mid Devon Housing homes.
- 73% tenants satisfied that their Mid Devon Housing home is well maintained.
- 79% tenants satisfied that their Mid Devon Housing home is safe.
- 99.52% of Mid Devon Housing homes meet Decent Homes standards – just 14 do not, mainly to due to property access issues with actions in place to resolve these.
- 98.13% of Mid Devon Housing repairs completed on target (target is 95% of urgent and routine repairs and 100% of emergency repairs). Those emergency repairs not completed within 24-hours are a small number cases, typically impacting on communal areas rather than individual homes where priority is always given to ensure our tenants are safe.

3.4 We will work closely with our tenants to ensure they feel safe, secure and happy in their homes

We will monitor and continue to improve overall tenant satisfaction. We will work to ensure that cases of antisocial behaviour are kept to a minimum. We will work with our tenants through engagement events, and be guided by them to ensure they feel safe, secure, happy and satisfied in their homes

- 2024/25 marked an exciting year of progress and community engagement across the district. Several new initiatives were launched, including our first-ever Rural Roadshow, where Housing Officers visited five rural locations to connect with tenants, address complaints, discuss repairs, and tackle local neighbourhood concerns.
- Our inaugural Damp and Mould Demonstration Day, featured live equipment testing, demonstrations, and the opportunity for residents to report issues first-hand. We also hosted our first Greener Homes event, where expert speakers shared practical advice on sustainable living, the work the Council are doing and the support available to tenants.
- Our regular coffee mornings in Crediton, Cullompton, and Tiverton continued to offer relaxed, accessible spaces for tenant engagement. We also increased collaboration with the Police and completed two successful neighbourhood walkabouts.
- We completed our second round of Tenant Satisfaction Measures (TSMs), showing improved satisfaction across all areas. To build on this, we introduced Repairs Satisfaction Surveys, now carried out after each job is completed. These complement our ongoing New Tenant, Complaints, ASB, and Planned Maintenance surveys, helping us continuously improve our services.
- Our presence in the community remains strong, with a continued focus on reducing antisocial behaviour (ASB) in partnership with local stakeholders. As part of ASB Awareness Week 2024, we organised a mini walkabout, a Members Briefing, and a special street surgery in collaboration with Cullompton Police.
- We remain committed to amplifying tenant voices and driving positive change. This includes feedback gathered through our downsizing incentive survey, insights from TSM comments and complaints, our ongoing damp and mould survey and learning about our tenants through the 'Getting to Know You' survey. We've also been active in recruiting Co-opted Tenant Representatives to join the Homes

PDG from June 2025 and have consulted on various policies through the Let's Talk Mid Devon platform which we continue to grow as an engagement hub.

3.5 We will support and respond to people presenting as homeless

We will act compassionately to minimise rough sleeping in the district, ensuring people have a safe warm place to sleep. We will maximise homelessness prevention through the use of different types of accommodation, and increase the number of housing options available. We will provide support and guidance for people presenting as homeless.

- 100% of all homelessness presentations into the Council receive full support and guidance
- All homeless presentations are determined against different duties and temporary accommodation is provided as required
- Meet the requirement to ensure no families are in hotel temporary accommodation after 6-weeks
- Using Local Authority Housing Fund funding to successfully acquire and convert existing empty properties in high-quality temporary accommodation for homeless use. Belmont Rd scheme is complete and fully occupied, St Pauls scheme is acquired and pending planning permission for conversion and Cabinet decision obtained to purchase a further property for conversion in Tiverton (current under acquisition)
- Trailing dedicated care leaver learning accommodation with a modern self-contained 1-bed unit with further three 1-bed units planned.

Economy and Assets

4.1 We will work with local businesses, stakeholders and residents to regenerate our town centres

We will act to secure and distribute grant funding to support our town centres. Events and projects will be used to encourage increased footfall and ensure vibrant high streets

- Using Council funding, along with UK Shared Prosperity and Rural England Prosperity Funding, the Council was able to offer an enhanced package of grant schemes under the Love your Town Centre umbrella. This has supported local businesses and organisations to bring forward town centre enhancements and improve vibrancy. These include the Shop Front Enhancement Scheme, Business Growth Fit-out grants and Digital High Streets (to support business to take up the latest Point of Sale technology and to connect digital to physical sales (driving sales through e-commerce e.g. website, social media etc.). The Vibrant Town Centres scheme also supported a portfolio of events to drive footfall and dwell time in the town centres. In addition, grants supported improvements to public realm and refreshed wayfinding infrastructure.

4.2 We will build on successful commercial activity, working with our communities to ensure its success

We will continue with prudent commercial ventures. This includes letting industrial units to local businesses, expanding electric vehicle charging points on council assets, and ensuring Tiverton Pannier Market continues to be a success.

- We continue to have excellent take up of our commercial property, with only one void. This continues to provide a steady yield to the Council, supporting vital service provision.
- At the Tiverton Pannier Market a number of new regular traders have started trading, including on the traditional Tuesday market day which has been less successful in recent years than the Friday and Saturday markets. The market team has continued to run a variety of initiatives to encourage use of the market. Examples of these activities include: The Annual Christmas Craft Fair (run by the Market team for the first time), Market Hamper event – where anyone spending over £5 from any Market Stall had a chance of winning a market hamper donated by traders. The Hamper being worth over £250 there were 400 participants. The Electric Night events have continued with an increase in events planned for 2025. The team continues to run the market successfully following a restructure of the team to delivery greater efficiencies.

4.3 We will support local businesses set-up, develop and grow

We will fully investigate the potential of establishing a co-working space for small businesses through the work hub project. We will drawdown and administer grants for local businesses to set up, develop and grow in the district.

- The Tiverton Work Hub project was successfully delivered through the Shared Prosperity Programme. The Work Hub will be launched in 2025/26. We also supported Petroc with its creation of a state-of-the-art Cotie Business Innovation Centre which provides advanced

technology-based facilities also funded through the Shared Prosperity programme. This includes access to innovation space for businesses to meet and work and access the latest technological equipment. Through the Prosper programme, project managed by Devon County Council on behalf of Mid Devon, a broad package of business advice and support has been provided. This support has included: pre-start up advice, training opportunities, general support to small businesses and dedicated tailored advice to businesses on recruitment and employment issues.

4.4 We will support business and economic development across Mid Devon, enabling job creation, and supporting sustainable tourism growth

We will build on our excellent track record of securing funding to support economic development projects and will support businesses develop into new markets. We will work to develop events and festivals in Mid Devon to encourage footfall into our communities to benefit our businesses, making Mid Devon a destination in its own right.

- Using funding allocation through the UK Shared Prosperity and Rural England Prosperity Funding a number of business support programmes were established as well as business grant schemes. These included the Prosper Business support programme that offered free to access one to one business support as well training events; “Prosperity” business grants; specialist business network events and training for Farm businesses; food and drink business and visitor economy businesses.
- The Economic Development team, working with the Council’s Climate and Sustainability Specialist, has launched a Green Enterprise Grant scheme to support businesses who wish to take action to reduce their carbon footprint and in doing so reduce their costs. Through Visit Mid Devon, the Council supports a network of visitor economy businesses these being predominantly small and micro businesses and include farm business diversification. Utilising UK Shared Prosperity Funding, and working with Food Drink Devon, Mid Devon’s food businesses were able to access this specialist business support network. Similarly Farm businesses were also able to access the Devon Agri-Tech Alliance(DATA) support programme through the SPF programme.
- Importantly the Economic Development Officer is liaising with businesses throughout the District having valuable conversations to assist in enabling businesses to access support and funding opportunities. This also includes facilitated access to networks, a recently launched e-newsletter (to connect businesses with latest opportunities) and continuing to champion the needs of our businesses with other agencies.

4.5 We will work with partners to ensure that Mid Devon has the infrastructure it requires to meet its potential

We will play a key role in realising the major infrastructure the district requires to help it meet its potential. This includes the upgrade to J28 of the M5; the Cullompton Town Centre Relief Road; Cullompton Station; Culm Garden Village; upgrading J27 of the M5; and the Tiverton Eastern Urban Extension.

- Funding has been secured for the provision of the Cullompton Town Centre Relief Road from Homes England. There has been significant progress since the announcement of funding particularly with regard to land assembly. The Outline Business Case for Junction 28 improvements has been submitted to the Department for Transport (DfT) and awaiting a decision from Government. A Final Business Case was submitted to DfT Rail last year for the Cullompton Railway Station but the Restoring Your Railway programme has

now been stopped by the new Government. It is hoped that there will be more positive news announced with regard to funding for Junction 28 improvements and the Railway Station at the June 2025 Comprehensive Spending Review.

4.6 Work with our communities and stakeholders to ensure our car parks meet the parking requirement needs of our communities

We will continue to work in a collaborative manner with key stakeholders to review the use of our car parks. We will ensure that our parking charges are fair whilst maintaining a sustainable business model

- The Council set up a Car Parking Consultation Group in 2023 to gather feedback and views from town and business representatives to help steer future tariff setting and also look at key issues of community value including enforcement and free Christmas Parking. Several papers have been taken on to the Economy and Assets PDG for member debate before formal recommendations have been made to Cabinet. The representatives who make up the Car Parking Consultation Group are very positive about the Group's discussions and positive impact on the local community.

4.7 The Council is able to maintain its property and land and maximise the benefits of these assets to the Council and to the public

It is vital that we maximise income streams from our assets. We will explore opportunities for partners becoming commercial tenants in our existing properties.

- Our asset base continues to benefit from enhancements, with new heat and power sources being implemented, and refurbishments to dance studios, offices and the flooring surrounding the swimming pools and changing rooms within our leisure centres. Our whole property estate have had detailed condition surveys to inform the future maintenance and investment programme. The announcement of Local Government Reform in Devon has put the possibility of letting to commercial tenants on hold.

Service Delivery and Continuous Improvement

5.1 We will ensure that the Council remains the employer of choice in Mid Devon

Against a set of challenging circumstances, we will ensure that our staff remain motivated and satisfied. We will ensure that staff development opportunities are available and that people choose to have long, productive, and happy careers with us.

- We have developed our course catalogue to provide all staff at the Council with broad opportunities for development in addition to development offered within their service and by their manager/ immediate team. This runs in parallel with the development of the Learning Partnerships Group at the Council, which allows for a broad representation of services to contribute to and comment on learning and development plans. There has been a reduction in staff turnover and an increase in staff employed (full time equivalents) at the Council and planning has begun for the next all staff survey. We continue to review the benefits available, with 6 monthly health checks the latest inclusion.

5.2 We will further increase our recycling services, enabling our communities to achieve even higher levels of recycling

Through education and enforcement, we will continue to reduce residual waste collected. Alongside this we will strive to have one of the highest recycling rates in England, and consider additional waste streams we can collect as recycling. Our services will remain excellent, with minimal missed bin collections, and a high opt-in rate to our garden waste service.

- Education and enforcement is a key part of our strategy to reduce waste which is being supported with extra temporary resource. Our national performance for 2023/24 was a 57.9% recycling rate (12th nationally, top 6%) and residual household waste collected per household reduced to 307.8kg (9th nationally, top 5%). For 2024/25 the recycling rate increased slightly to 58% and the residual waste collected decreased to 300.3kg/household. Missed bin collections have remained at 0.03% and around 12,000 households have opted-in to our garden waste collections. A trial of pots and pans collections is currently taking place along with a review of how nappies, coffee pods and blister packs are collected. A review of soft plastic collections will take place with a view of implementation by 2027.

5.3 We will maintain our leisure services and ensure they are fit for the future

We recognise the need to continue to reduce the environmental impact of our leisure services and will work to reduce the carbon emissions of our leisure centres. We will also strive to move the service to having less financial dependence on the Council, whilst ensuring our leisure users are satisfied.

- The service continues to improve and invest in reducing its carbon footprint with technology such as Combined Heat and Power, battery storage and more. The target to reduce subsidy is going in the right direction with significant improvement, while continuing to invest in improving facilities and offering the community more ways to be active.

5.4 Council finances remain sustainable despite difficult financial conditions

Prudent financial management is critical in the testing financial environment. We will build up our financial reserves, maximise income collection, and ensure that debt remains at an appropriate level

- A balanced budget for 2025/26 has been agreed. The future year estimated deficits remain at over £3m with significant uncertainty around Local Government funding following announcements of fundamental changed to grant funding formulae and the Business Rates retention scheme. Medium Term Financial Plan discussions are in progress with a strategy being developed that will mitigate longer term shortfalls.
- 2024/25 Outturn shows a healthy underspend position for the General Fund which will be placed into Earmarked Reserves to help mitigate the implications of future funding uncertainties. The Housing Revenue Account (HRA) outturn position was an overspend, this was due to a number of one-off year-end adjustments. On an ongoing day-to-day basis the HRA remains financially healthy.

5.5 We will continue to improve and transform our services

We will continue to take the opportunities that arise from digital transformation to improve our services. Where appropriate we will consider opportunities for shared services or new ways of working with our partners. We will seek to improve our overall productivity to ensure value for money

- The Digital Services team are busy rewriting online forms to improve self-service options, reviewing website content, and working with Waste to further improve waste collection efficiency through improved real-time response to collection issues.
- The announcement of Local Government Reform in Devon has delayed the possibility of collaborative or partnership working in the short term whilst the future vision is identified. Once agreed, the pace of joint working will increase significantly as we form the new entity.

5.6 Ensure that the public have a good understanding of council services, and that they are satisfied that the services are efficient and effective

We will strengthen our public communications to ensure clarity on the services that we are responsible for. We will measure public satisfaction and act on the results to ensure residents are satisfied with our performance

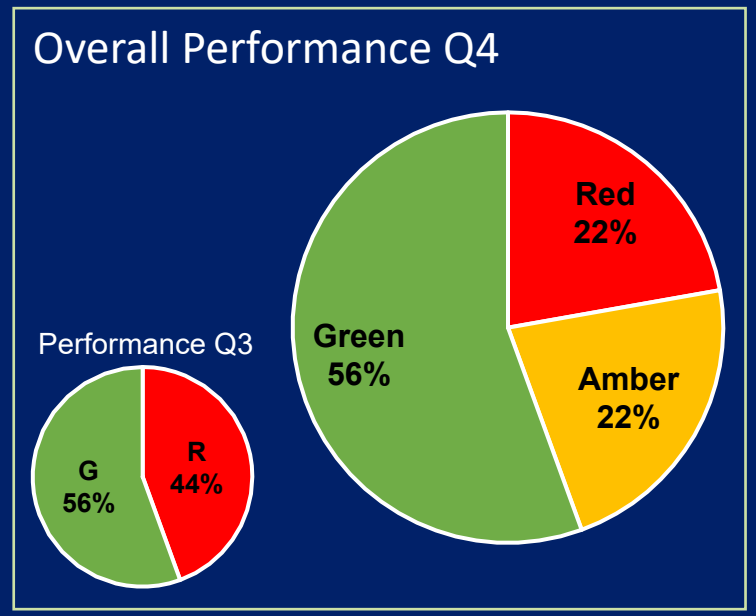
- Our Communications team continues to support services with sharing positive news about the council, and any changes to service delivery, to our residents and businesses. Over the past year there has been a focus on highlighting the continued success of the waste and recycling service, the benefits of the new CRM system and more recently communication support for the launch of Active Mid Devon. The Communications team ran a public satisfaction survey at the end of 2024 and this was open to all residents, both in digital and paper format. While the response rate was down on previous years, the satisfaction rates showed improvement with overall satisfaction with the council increasing from 41% the previous year to 52% in 2024. The Communications team is continuing to look at how we can increase the response rate for future surveys.

Planning, Environment & Sustainability PDG Performance Dashboard – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Own fleet CO2e avoided (YTD)	21.3 t CO_2e	10 t CO_2e	G
Solar panel performance – corporate estate (YTD)	114 t CO_2e	50 t CO_2e	G
Electric car charger points installed across MDDC sites (YTD)	6	4	G
Householder planning applications determined within 8 weeks (Past 12 months)	100 %	70%	G
Minor applications overturned at appeal (Past 12 months)	0.2 %	10%	G

Finance Measures	Performance	Annual Target	RAG
PE&S PDG – Outturn	£1,443k	£1,403k	A
PE&S PDG – Capital Outturn	£0	£80k	R
PE&S PDG – Capital Slippage % of projects (Current)	100%	0%	R
Building Control Income – Projected Outturn	(£211k)	(£221k)	A

Corporate Risk	Risk Rating (Trajectory)
Failure to meet Climate Change Commitments by 2030	15 (No Change)



In Focus

In 2024/25 six electric car rapid charger points were commissioned and installed, two at William Street, Tiverton, two at Forge Way, Cullompton, and two at Market Street, Crediton. The Council has exceeded its target of four new charging points in 2024/25, and now hosts 22 charge points on its sites.

In 2024/25 there were 5,230 uses of EV charging points on Council facilities, with 1,416 uses in Q4.

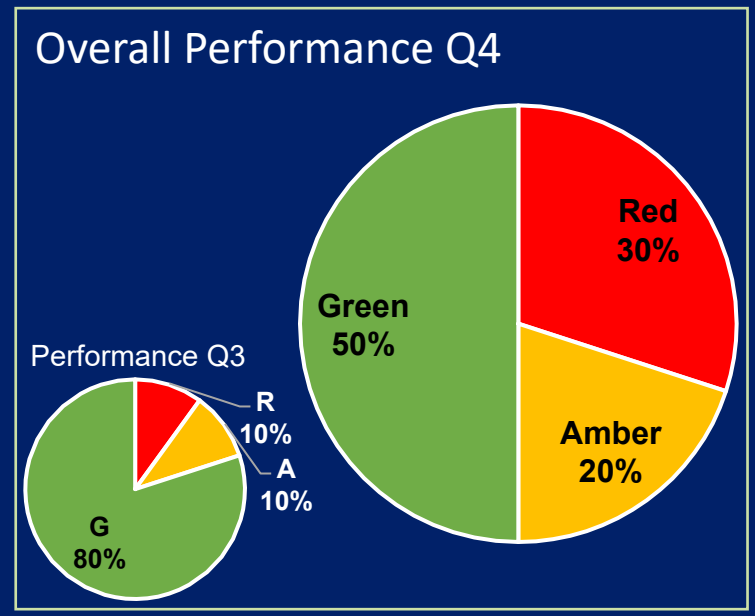
Data on the Council's carbon footprint for 2024/25 will be available in July/ August.

Economy & Assets PDG Performance Dashboard – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	Rating
Pannier market occupancy rate (Average YTD)	84 %	85 %	A
Businesses supported – non financial support (YTD)	342	250	G
Commercial property voids (YTD)	1.7 %	5 %	G
Events supported in our town centres (YTD)	187	6	G
Tourism events supported (YTD)	4	2	G
Business rateable value (Current)	£54,792,704	N/A	
Empty business properties (Current)	232	N/A	
Funding secured to support economic projects (YTD)	£1,318,995	£400,000	G

Finance Measures	Performance	Annual Target	Rating
E&A PDG – Outturn	£27k	£980k	R
Car Parking Income – Outturn	(£1,065k)	(£1,102k)	A
Pannier Market Income – Outturn	(£87k).	(£108k)	R
E&A PDG – Capital Slippage % of projects (Current)	22%	0%	R

Corporate Risk	Risk Rating (Trajectory)
Culm Garden Village – Loss of capacity funding	9 (No Change)
Culm Garden Village – Project delays/ impacts due to infrastructure delays	15 (No Change)
Cullompton Town Centre Relief Road	15 (No Change)



In Focus

The 2025 Green Enterprise Grant is now available to small and medium businesses in the district. It offers capital grants from £500 to £5,000, covering up to 50% of eligible project costs. https://letstalk.middevon.gov.uk/green-enterprise-grants-2025

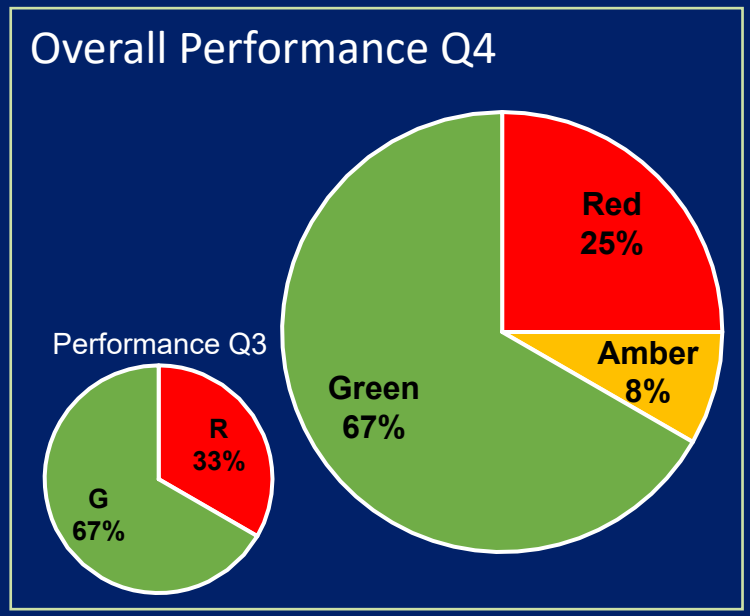
The Outturn underspend is mainly related to maintenance which has gone back into the Earmarked Reserve to fund future maintenance. The underspend reflects that the asset base is in a relatively good condition. Condition surveys are in place and future planned maintenance will increase.

Community, People & Equalities PDG Performance Dashboard – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Homes made safe under the Housing Assistance Policy (YTD)	110	60	G
Complaints resolved within target timescales (YTD)	93 %	85 %	G
New Subscribers to Let's Talk Mid Devon (YTD)	162	400	R
Support towns and parishes to develop their Community Emergency Plans (YTD)	5	4	G
Support VCSE sector by securing external funding (YTD)	£252,973.09	£200,000	G
Licenced vehicle inspections (YTD)	47	40	G
Food Service - Total Inspections completed (Current QTR)	67.8 %	100 %	R
Private water supply sampling (YTD)	80	120	R
Environmental protection service requests (Average YTD)	97.8 %	95 %	G
Engagement rate on Let's Talk Mid Devon (Current)	15.0 %	16.0 %	A

Finance Measures	Performance	Annual Target	RAG
CP&E PDG – Outturn	(£50k)	£1,018k	G
CP&E PDG – Capital Slippage % of projects (Current)	0 %	0 %	G
Council Tax Reduction Scheme (Current)	£4,861,539	N/A	

Corporate Risk	Risk Rating (Trajectory)
Severe Weather Emergency Recovery	12 (No Change)



In Focus

The Council supported the development of five community emergency plans by towns and parishes in 2024/25 (Cullompton, Bradninch, Willand, Nymet Rowland and Tiverton), ahead of the target of four per annum.

There were 495 complaints in 2024/25. Of these 93% were responded to within the target timescales, against a target of 85%.

The Outturn is showing as (£50k) for 2024/25. This is due to the late S106 of £1m received for air quality around the Cullompton Relief Road.

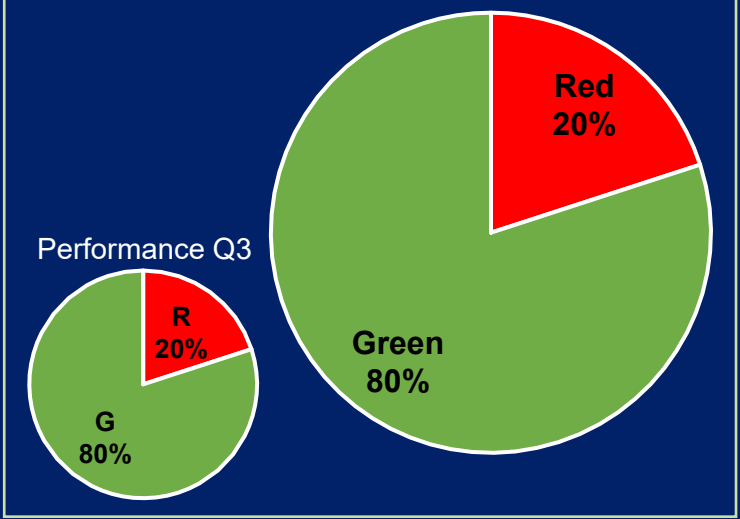
Homes PDG Performance Dashboard (General Fund) – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Providing support to those experiencing homelessness	100 %	100 %	G
Applicants on the Devon Home Choice waiting list (Band A-C)	536	N/A	
Households in Hotels (Current)	15	N/A	
Households placed in interim or temporary accommodation this quarter	77	TBC	
Home Improvement Loans sanctioned (YTD)	13	10	G
Private rented sector improvements (YTD)	12	10	G
Private sector housing service requests response rate (Av. YTD)	95.3 %	95 %	G
Unoccupied and unfurnished empty homes (Current)	479	N/A	

Finance Measures	Performance	Annual Target	RAG
Homes PDG – Outturn	£224k	£393k	R
Spend on external interim and temporary accommodation (Q4)	£463k	N/A	

Corporate Risk	Risk Rating (Trajectory)
Homes for Ukraine Scheme	4 (No Change)

Overall Performance Q4



In Focus

Support was provided to 100% of those experiencing homelessness in 2024/25. There was a slight decrease in the number of homelessness approaches in 2024/25 compared to the previous year (771 in 2024/25; 802 in 2023/24), but the complexity of cases is increasing.

The Homes PDG (General Fund) is showing an underspend due to the late Homelessness Prevention Grant of £241k being received in 2024/25. Without that the service has slightly overspent, hence Red RAG status.

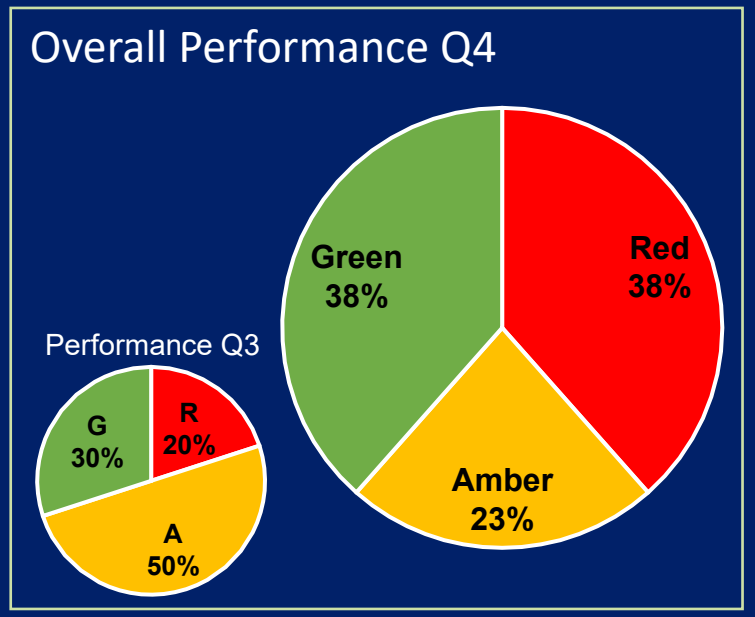
Homes PDG Performance Dashboard (HRA) – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
MDH Satisfaction that the home is safe (TSM – TP05)	79 %	70 %	G
MDH Delivery of new Social Housing (YTD)	29	100	R
New MDH net-zero MMC properties (YTD)	8	50	R
Tenant satisfaction with the overall repairs service (TSM – TP02)	72 %	70 %	G
Market delivery of new affordable homes (YTD)	57	94	R
MDH Overall tenant satisfaction (TSM - TP01)	70 %	TBD	
MDH Complaints responded to within Complaints Handling Code timescales (TSM-CH02; Average YTD)	98.8%	100 %	A
MDH Antisocial behaviour cases relative to the size of the landlord (TSM – NM01; YTD)	9.82	TBD	
MDH Housing stock occupancy rate (YTD)	97.5 %	97 %	G
MDH Routine repairs completed on time (Average YTD)	99 %	95 %	G
MDH specific tenant engagement events (YTD)	109	100	G

Finance Measures	Performance	Annual Target	RAG
HRA – Outturn	£1,698k	£0	R
HRA – Tenant Income (Outturn)	(£14,320k)	(£14,641k)	R
HRA – Capital Outturn	£14,131k	£14,816k	A
HRA – Capital Slippage % of development projects (Current)	24%	0 %	A

Corporate Risk	Risk Rating (Trajectory)
Housing Crisis	12 (No Change)

Corporate Risk	Risk Rating (Trajectory)
Housing Rent Correction Error	8 (No Change)



In Focus

In 2024/25, 72% of tenants were satisfied with the overall repairs service (target: 70%). This measure is set nationally as part of the Tenant Satisfaction Measures (TSMs).

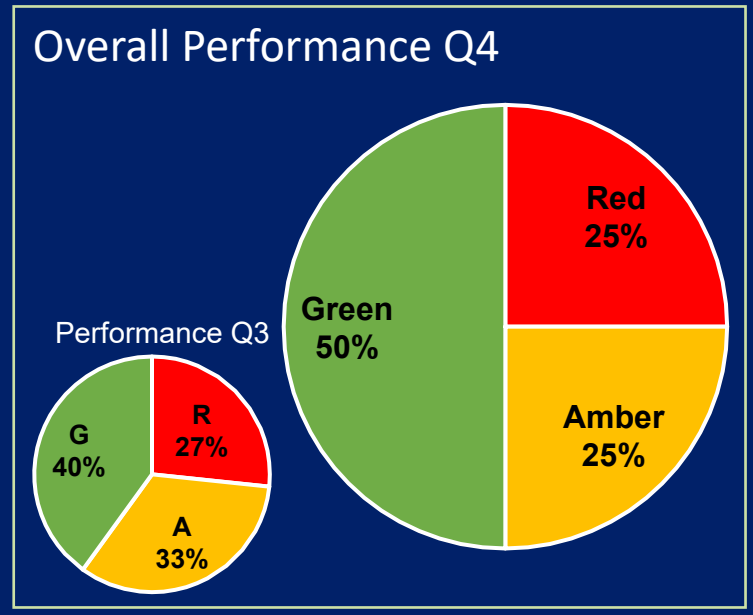
Another TSM which is part of the Corporate Plan is satisfaction that the home is safe. In 2024/25, 79% of Council tenants agreed that they felt their home was safe, against a target of 70%.

Service Delivery and Continuous Improvement PDG Performance Dashboard – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Household waste collected per household (YTD)	300.3 Kg	300 Kg	A
Household recycling rate (Average YTD)	57.9 %	58.5 %	A
All council complaints resolved within timescales (Average YTD)	93 %	85 %	G
Staff turnover (YTD)	16.3 %	17.0 %	G
Missed Bin Collections - All (YTD)	0.031 %	0.03 %	A
Leisure cost per visit (YTD)	£0.84	£1.12	G
National non-domestic rates collection rate (YTD)	99.8 %	98 %	G
Council Tax collection rate (YTD)	97.6 %	97.5 %	G
Public survey engagement rate (YTD)	9.4 %	15.0 %	R
Households on chargeable garden waste (Current)	12,150	12,200	A
Response to FOI/ EIR requests within 20 working days (YTD)	99.6 %	97%	G

Finance Measures	Performance	Annual Target	RAG
SD&CI PDG Outturn	£4,347k	£5,447k	G
Income received from recycled material (YTD)	(£600k)	(£437k)	G
Agency Spend 'v' Budget (SD&CI; YTD)	£278k	£110k	R
SD&CI PDG – Capital Outturn	£2,160k	£3,274k	R
SD&CI PDG – Capital Slippage % of projects (Current)	63%	0%	R

Corporate Risk	Risk Rating (Trajectory)
None related to PDG	



In Focus

Staff turnover for 2024/25 was 16.3%. This is the lowest staff turnover recorded by the Council since 2020/21.

Council Tax collected in 2024/25 was 97.55%, slightly higher than last year (97.51%) and exceeded the annual target (97.5%).

Household waste recycled in 2024/25 was 57.9% and is behind the annual target (58.5%). This represents a similar recycling rate to 2023/24 (57.8%), however the total waste collected has decreased showing that residents are reusing and reducing their overall waste.

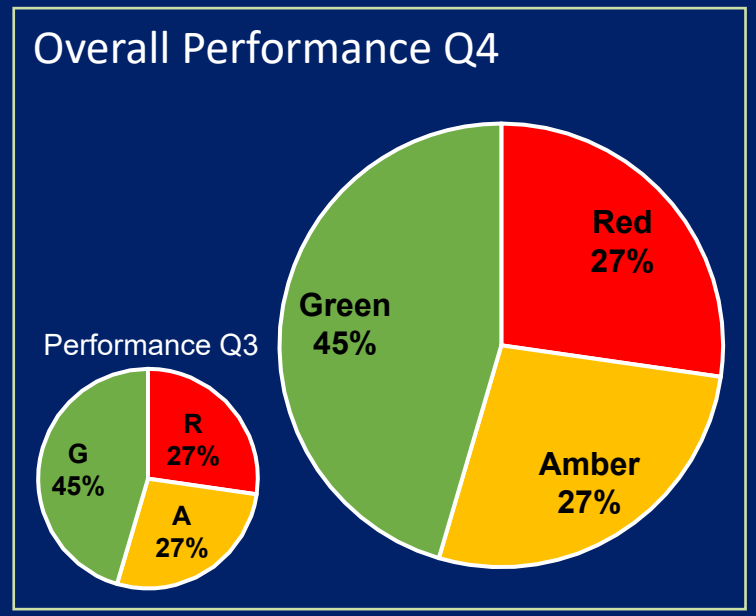
Corporate Performance Dashboard - Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Sickness absence (working days lost YTD)	7.4 days	8.5 days	G
Number of projected FTE filled (Average YTD)	90.3 %	90.0 %	G
Council Tax paid by Direct Debit (Current)	77 %	80 %	A
Non-domestic rates paid by Direct Debit (Current)	49 %	50 %	A
Cyber security awareness training uptake (Current)	91 %	90 %	G

Finance Measures	Performance	Annual Target	RAG
Cabinet Services – Outturn	£6,538k	£6,071k	R
No of Procurement Waivers required (QTR)	3	0	A
Treasury Income – £ return (YTD)	(£927k)	(£1,059k)	R
Invoices Paid on time (YTD)	99.5 %	98.0 %	G
Sundry Debt recovery rate (YTD)	97.9 %	95.0 %	G
Agency Spend 'v' Budget	£200k	£0	R

Corporate Risk	Risk Rating (Trajectory)
Cyber Security	20 (No Change)
Information Security	12 (No Change)
Financial Sustainability	16 (No Change)
Cost of Living Crisis	16 (No Change)

Corporate Risk	Risk Rating (Trajectory)
Corporate Property Fire Safety	9 (No Change)
Devolution and Local Gov. Reorganisation	20 (No Change)



In Focus

Staff sickness absence was 7.35 days per FTE for 2024/25 against a performance target of 8.5 days. Sickness absence in the previous financial year was 10.45 days.

Invoices paid on time by the Council was near to a record high in 2024/25 at 99.5%. This demonstrates that the Council is a good organisation to do business with.

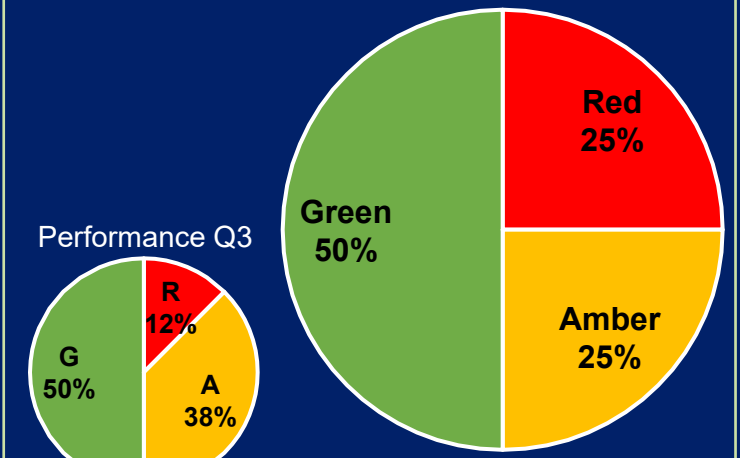
Planning Dashboard – Quarter 4 2024/25

Performance Measures	Performance	Annual Target	RAG
Major applications overturned at appeal (Past 24 months)	0.3 %	10 %	G
Minor applications overturned at appeal (Past 24 months)	0.2 %	10 %	G
Major Planning applications determined within 26 weeks (Past 12 months)	92 %	100 %	A
Minor and other planning applications determined within 16 weeks (Past 12 months)	93 %	100 %	A
Householder planning applications determined within 8 weeks (Past 12 months)	100 %	70 %	G
Planning applications over 13 weeks without a decision (Current)	59	N/A	
Planning Enforcement: Total Open Cases (Current)	383	N/A	
Planning Enforcement: New Cases received in quarter	48	N/A	
Planning Enforcement: Cases Closed in quarter	42	N/A	

Finance Measures	Performance	Annual Target	RAG
Cost of Planning Appeals (YTD)	£68k	£0	G
Planning fees income – Statutory (YTD)	(£802k)	(£908k)	R
Planning fees income – Discretionary (YTD)	(£141k)	(£175k)	R
S106 income (YTD)	(£1,439k)	N/A	
S106 spend (YTD)	£413k	N/A	

Corporate Risk	Risk Rating (Trajectory)
Quality of Planning Committee Decisions	6 (No Change)
Building Control Service Viability	12 (No Change)

Overall Performance Q4



In Focus

In 2024/25 we received 1,136 applications (1,082 determined). Some delay in processing applications resulted from the new requirement to secure Biodiversity Net Gain (BNG) for many applications. This has required extra documentation and closer working with the county ecology team to assess BNG submissions. We approved 3 off site habitat banks within the district that allow developers to acquire credits in the event that they cannot deliver improvements on site.

Over the same period we received appeal decisions on 21 cases with a 57% success rate in having appeals dismissed.

Report for:	**Cabinet**
Date of Meeting:	8 July 2025
Subject:	Corporate Risk Report
Cabinet Member:	Cllr Luke Taylor, Council Leader
Responsible Officer:	Steve Carr, Corporate Performance and Improvement Manager. Matthew Page, Head of People, Performance & Waste.
Exempt:	N/A
Wards Affected:	All
Enclosures:	Appendix 1: Corporate Risk Matrix Appendix 2: Corporate Risk Register

Section 1 – Summary and Recommendation(s)

To provide Members with a quarterly update on the Corporate Risk Register.

Recommendation(s):

That Members review the Corporate Risk Register and feedback any areas of concern.

Section 2 – Report

1.0 Introduction

1.1 The Corporate Risk Register (CRR) contains the strategic risks which are most likely to impact the corporate priorities of the Council. It is reviewed at least quarterly by Heads of Service and the Leadership Team and updated as required. It is then presented to the Audit committee and to Cabinet. Risks are managed on the Council's corporate performance and risk management system, SPAR.

1.2 The corporate risks are presented on a risk matrix (heat map), Appendix 1. Information on each risk is presented in a standard template, Appendix 2.

These risks have been determined by the Council's Leadership Team in consultation with Heads of Service and other Council officers.

2.0 Summary of Corporate Risk

2.1 There are currently 16 risks on the CRR. Risks are presented with both their current and target risk ratings. Also included is a trend symbol indicating any change to the risk rating since the previous review.

Risk Name		Risk Owner	Risk Rating		
			Current	Trend	Target
CR1a	Culm Garden Village – Loss of capacity funding	Group Manager for GED	9	⇔	9
CR1b	Culm Garden Village – Delay/ impact to project arising from infrastructure delays	Group Manager for GED	15	⇔	15
CR2	Cyber Security	ICT Operations Manager	20	⇔	15
CR3	Failure to meet Climate Change Commitments by 2030	Head of Finance, Property & Climate Resilience	15	⇔	9
CR4	Homes for Ukraine Scheme	Head of Housing & Health	4	⇔	9
CR5	Information Security	Head of Digital Transformation & Customer Engagement	12	⇔	8
CR7	Financial Sustainability	Head of Finance, Property & Climate Resilience	16	⇔	12
CR8	Quality of Planning Committee Decisions	Director of Place & Economy	6	⇔	3
CR10	Cullompton Town Centre Relief Road	Group Manager for GED	15	⇔	15
CR11	Cost of Living Crisis	Head of Revenues, Benefits & Leisure	16	⇔	16
CR12	Housing Crisis	Head of Housing & Health	12	⇔	9
CR15	Corporate Property Fire Safety	Chief Executive	9	⇔	6
CR16	Building Control Service viability	Building Control Manager	12	⇔	2
CR17	Severe Weather Emergency Recovery	Head of Housing & Health	12	⇔	9
CR18	Housing Rent Error Correction	Head of Housing & Health	8	⇔	3
CR19	Devolution and Local Government Reorganisation	Chief Executive	20	⇔	15

Risk rating change since previous update:

⇧ Increased ⇔ No change ⇩ Decreased

2.2 For each risk the following information is given in Appendix 2:

- Risk name
- Risk description

- Current risk severity and likelihood
- Current risk rating
- Risk Owner
- Risk Type
- Mitigating actions (including name, description, responsible officer, current effectiveness and when it was reviewed)
- Notes.

2.3 Since this report was last published in March 2025, the following significant changes have been made to the CRR:

- CR9a: Reputational Impact of 3 Rivers was removed in May 2025. The company undertook no operational activities in 2024/25 and was formally dissolved on the 26 November 2024 and all assets/liabilities were transferred to the Council during the 2023/24 financial year. As such it has been decided that this corporate risk can now be removed. Any updates on the assets transferred to the Council will be made in the standard financial performance reports received by the Cabinet.
- CR5.3 Supply Chain Management: Action added in April 2025.
- CR12.13: Funding applications: Action marked as complete in May 2025.
- CR17.6 Waste Collection Backlog: Action marked as complete in May 2025.
- CR19.5 Interim Plan: Action added and then marked as complete in March 2025.

Financial Implications

There are no direct financial implications arising from this report. However, risks which are not mitigated may have financial implications for the council. Equally, the treatment of risk may require resources to be (re)allocated. Having a robust approach to risk management will continue to help the council minimise future financial risks and implications. A number of the corporate risks being managed contain financial risk, such as CR7 Financial Sustainability.

Legal Implications

Risk management is an integral part of the Council's Corporate Governance arrangements and there is a statutory responsibility under the Account and Audit Regulations (2015) to put in place risk management arrangements.

Risk Assessment

Failure to take advantage of opportunities and mitigate risks could impact on the Council's ability to deliver its strategic objectives. Assessment of the effectiveness of the framework for identifying and managing risks and for demonstrating clear accountability is a key element of the Council's governance arrangements.

Impact on Climate Change

Corporate Risk 3 relates directly to the council meeting its climate change targets.

Equalities Impact Assessment

Having a council which is resilient to risk means that it is better positioned to support its communities. A number of corporate risks which relate to equalities are detailed on the Corporate Risk Register. This includes CR4 Homes for Ukraine; CR11 Cost of Living Crisis; and CR12 Housing Crisis. Actions to mitigate these risks will support the council meet its equality duties.

Relationship to Corporate Plan

Effective risk management is crucial to enable the council to mitigate risks to achieving 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: 25 June 2025

Statutory Officer: Maria De Leiburne
Agreed on behalf of the Monitoring Officer
Date: 25 June 2025

Chief Officer: Stephen Walford
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 25 June 2025

Performance and risk: Steve Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 28 May 2025

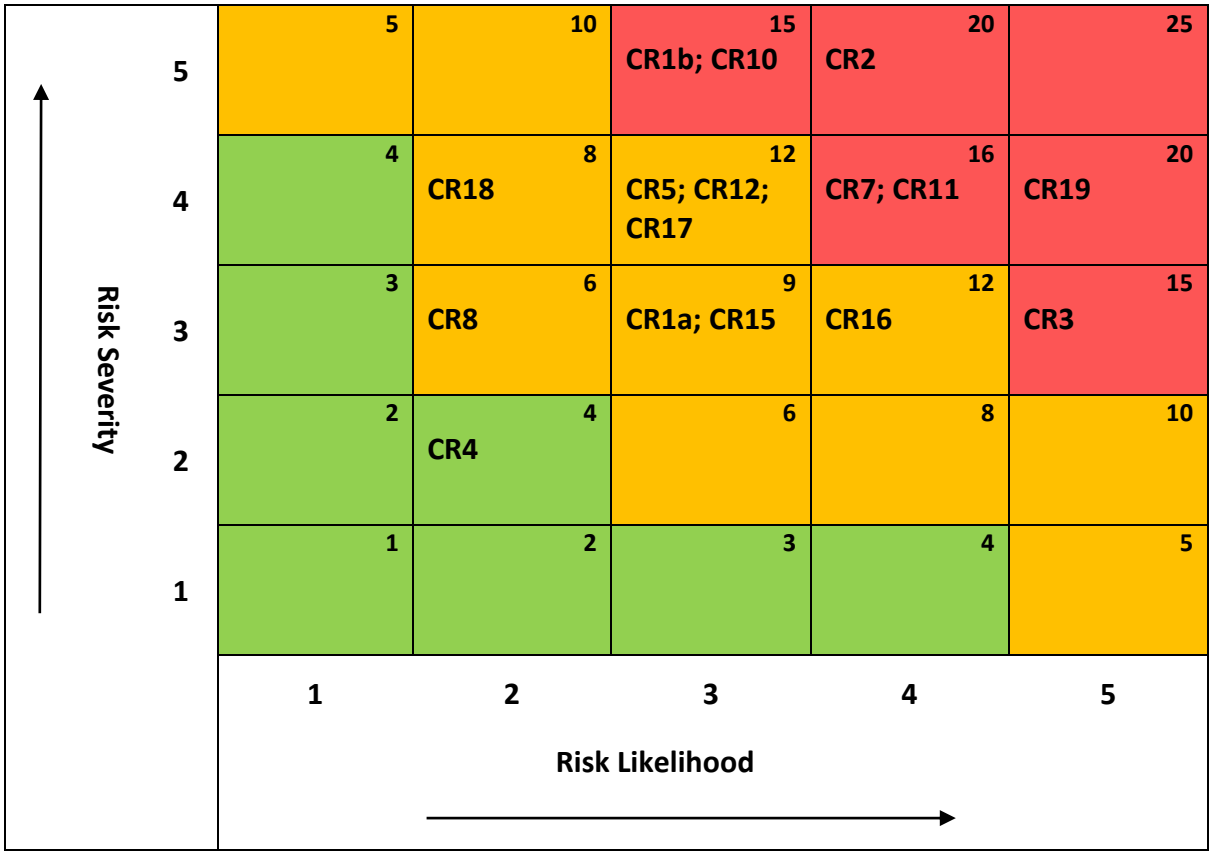
Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Steve Carr, Corporate Performance and Improvement Manager
Email: scarr@middevon.gov.uk
Telephone: 3CX: 4217

Background papers:

Appendix 1: Corporate Risk Matrix



Appendix 2: Corporate Risk Register

CR1a	Culm Garden Village – Loss of capacity funding	Current Severity: 3	Current Likelihood: 3	Current Risk Rating: 9
Risk Description: Possible discontinuance of Government funding support for Culm Garden Village activities, thereby affecting Mid Devon District Council Culm Garden Village team capacity and leadership function, resulting in project/programme slippage.				
Risk Owner: Group Manager for GED	**Latest Review:** 14/05/2025	**Risk Type:** Economic/ Financial		

Mitigating Actions		Responsible Officer	Current Effectiveness
CR1a.1	Funding opportunities: Lobby for further rounds of Homes England garden communities capacity funding	Group Manager for GED	Satisfactory
CR1a.2	Identify alternative opportunities to secure funding to support the project – including from landowners/ developers involved in the Culm Garden Village project.	Group Manager for GED	Satisfactory

Notes:
This risk relates to the funding sources in place for the Culm Garden Village, rather than the overall delivery of the Culm Garden Village project. Capacity funding was secured for this financial year; however we do not currently have any assurances of funding for the next financial year. Although recent developments in relation to funding of the relief road are welcomed along with the capacity funding for this financial year, the risk remains higher than the target risk as longer term capacity funding remains uncertain.

CR1b	Culm Garden Village – Delay/ impact to project arising from infrastructure delays	Current Severity: 5	Current Likelihood: 3	Current Risk Rating: 15
Risk Description: Lack of Government funding for enabling infrastructure – Cullompton Town Centre Relief Road/ Junction 28/ Cullompton station re-opening – resulting in delays to scheme progression and housing delivery.				
Risk Owner: Group Manager for GED	**Latest Review:** 14/05/2025	**Risk Type:** Economic/ Financial		

Mitigating Actions		Responsible Officer	Current Effectiveness
CR1b.2	Junction 28, M5: Continue to work closely with Devon County Council on Strategic Outline Business Case with the aim of securing funding to upgrade Junction 28 – Devon County Council to submit bid to Government in March/ April 2024 following Devon County Council Cabinet approval.	Group Manager for GED	Fully Effective
CR 1b.3	Cullompton station re-opening: Continue to work closely with Network Rail to ensure the timely submission of the Final Business Case to Government.	Group Manager for GED	Action Required

Notes:
Funding now secured for provision of the Relief Road from Homes England. Significant progress with regard to land assembly. The Outline Business Case for J28 improvements has been submitted to Department for Transport (DfT) and awaiting a decision. A final Business Case was submitted to DfT Rail last year for the Cullompton Railway Station but the Restoring Your Railway programme was stopped by the new Government. It is hoped that there may be positive news announced with regard to funding for J28 improvements and the Railway Station at the June 2025 Comprehensive Spending Review.

CR2	**Cyber Security**	**Current Severity: 5**	**Current Likelihood: 4**	**Current Risk Rating:20**
Risk Description: Inadequate Cyber Security could lead to breaches of confidential information, damaged or corrupted data and ultimately Denial of Service. If the Council fails to have an effective ICT security strategy in place. Risk of monetary penalties and fines, and legal action by affected parties.				
Risk Owner: ICT Operations Manager	**Latest Review:** 30/04/2025	**Risk Type:** Data Protection/Information Security		
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**	
CR2.5	Regular Vulnerability scans on network devices: ICT use 'Nessus' vulnerability scanner to access and detect vulnerabilities on all network devices. Mitigation is then completed to remove or reduce the risk due to the vulnerability. Although this has only been added now as an action, it has been running for a number of years.	ICT Operations Manager	Satisfactory	
CR2.6	Active Directory review: The current Active Directory (AD) (the address book for all users in MDDC to use computers) has been around for over 20 years. it has been managed, updated by ICT Staff and has a lot of clutter. A project is underway to review the configuration of AD to simplify the hierarchy and review the policies applied to the users, PCs and server on the MDDC Network. It will also provide a mean to fully incorporate the Microsoft and NCSC security baselines, to ensure full compliance and improve security.	ICT Operations Manager	Satisfactory	
CR2.7	Establish Supply Chain Risk Management: There is no risk on the IT risk register to highlight supplier failure. It would be beneficial to include a risk regarding supplier failure to ensure that all associated supplier risks & potential controls are considered, e.g. a Standard Operating Procedure and/or minimum requirements to obtain assurance e.g. from regular meetings etc.	Head of Digital Transformation & Customer Engagement	Action Required	
Notes:				

Work and review of cyber security is always on-going. The annual IT Health Check was completed in March and the ICT Team are working through the mitigation list to ensure compliance with PSN (Public Services Network) certification. Work has also been completed on Cyber Assessment Framework (CAF) assurance with the Ministry of Housing, Communities and Local Government (MHCLG) and an improvement plan has been developed. As soon as MHCLG has reviewed the improvement plan, work will commence on any mitigation required - submission has been delayed by MHCLG, due to issues with their secure portal to upload documents. The procurement of the Managed Cyber Security Monitoring, Detection and Response (MXDR) service has completed and the contract will commence on 12/05/2025. The service should be fully active before the next review.

CR3	**Failure to meet Climate Change Commitments by 2030**	**Current Severity: 3**	**Current Likelihood: 5**	**Current Risk Rating: 15**
Risk Description: Due to a variety of factors, there is a risk that the Council will not meet its goal of becoming carbon neutral by 2030. There is also a risk that the Council will not achieve district-wide progress to meet obligations under the Climate Act 2008 for climate adaptation (resilience) and mitigation (emission reductions).				
Risk Owner: Head of Finance, Property & Climate Resilience	**Latest Review:** 12/05/2025	**Risk Type:** Environmental		
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**	
CR3.1	Policy and Strategy: Policy and strategy relevant to the climate emergency includes: • Corporate Plan 2020-2024 sets a number of relevant aims; • Climate Strategy and Handbook 2020-2024; • Housing Strategy 2021-2025; • Procurement Strategy (March 2023); • Cabinet adopted a new Climate Emergency planning policy statement (March 2023); • Local Plan 2013-2033 review; Plan Mid Devon sets the Climate Emergency as the top overarching priority for the next Local Plan.	Climate and Sustainability Specialist	Satisfactory	
CR3.2	Oversight and decision-making: To embed a consistent approach to committee reports, project reports and decision-making, considering the potential climate impacts and opportunities and adaptation needs linked to the climate crisis.	Climate and Sustainability Specialist	Satisfactory	
CR3.3	Climate Change Strategy and Climate Action Plan: Cabinet approved the new Cabinet Climate Change Strategy (2025-2028) and a Climate Action Plan (CAP) in December 2024. Themed alignment of strategic, policy and operational activity. CAP to be reviewed annually to reflect the pipeline of planned projects, budgets, etc. The	Climate and Sustainability Specialist	Satisfactory	

	Strategy serves as a starting point for engagement with communities, businesses and other partners, to co-create a vision.		

Notes:
This review recognises the 2024-2028 Climate Change Strategy (CCS) and that the annual Climate Action Plan (CAP) is in place. A review of the forthcoming progress could justify a change of risk level.
The new CCS aligns with the Corporate Plan 2024-28 and with the Devon Carbon Plan, with themes linked to all of the Council's Policy Development Groups. The joined-up approach and commitment to an annual operational CAP shows close connection between strategic, policy and operational activity, intended to foster a shared sense of ownership for delivery, across the organisation. The CCS serves as a starting point for engagement with communities, businesses and other partners, to co-create a vision for a sustainable future.
Summary notes below amended from the previous review.

Corporate: The Council's annual carbon footprint has decreased since the 2018/19 baseline (2024/25 report to be prepared soon). This is published online at https://sustainablemiddevon.org.uk with highlights of the most recent action to respond to the climate emergency. Progress achieved with key aspects, where under direct control. All Council facilities now on a renewable electricity tariff and the Council has invested to improve energy efficiency at its facilities. Capital investment to decarbonise the Culm Valley Sport Centre will take place in 2025 following on from the 2023/24 projects at Crediton and Tiverton leisure centres. A small proportion of the fleet - 10 vans have been replaced by electric vehicles (EVs). The Council has guidance on climate and sustainability statements (for project management and committee reports) to cultivate consistent, meaningful assessments of impacts and related actions to address them. (Action CR3.2.)

Community: Relevant activities in partnership with/ in support of communities include award-winning net zero ready housing with adaptation features, Green Enterprise Grants, tree planting, community orchards, engagement projects, boosting green transport infrastructure (active travel and EVs), planning.

CR4	Homes for Ukraine Scheme	Current Severity: 2	Current Likelihood: 2	Current Risk Rating: 4

Risk Description: There is a risk of the 'Homes for Ukraine scheme' failing should the host relationship breakdown and re-matching is not an option. Where refugees cannot afford to pay for private accommodation the Council has a Homelessness Duty.

Risk Owner: Head of Housing & Health	**Latest Review:** 27/05/2025	**Risk Type:** Social

Mitigating Actions		Responsible Officer	Current Effectiveness
CR4.9	End of hosting arrangements: There is currently uncertainty over whether the thank you payments for hosting arrangements will continue beyond three years. Once the hosting comes to an end the Ukrainian guests will need to find alternative	Operations Manager - Public Health	Satisfactory

	accommodation and this could be within Mid Devon or further afield. Mid Devon housing options will be required to assist with housing this group.		
CR4.10	Funding for guest grants: Mid Devon provides grants to Ukrainian guests so they can access the private rented sector when their hosting ends. Grants may not be available in 2025/26. The current Ukraine funding is being kept under review with a view to any underspend being earmarked for 2025/26 to continue grants. This will help mitigate pressures as a result of hosting arrangements ending. Mid Devon has nine houses available as temporary accommodation if they are unable to find private rented accommodation at the time the hosting ends.	Operations Manager - Public Health	Satisfactory
Notes: Additional arrivals continue to be very low. Local Authority Housing Fund 1 funding spend complete and ten temporary accommodation (TA) properties in use. These substantially support TA where required for Homes for Ukraine guests. Ongoing support for transition into private rental sector continues to be effective (CR4.9)			

CR5	**Information Security**	**Current Severity: 4**	**Current Likelihood: 3**	**Current Risk Rating: 12**
Risk Description: Inadequate data protection could lead to breaches of confidential information and ultimately enforcement action by the ICO.				
Risk Owner: Head of Digital Transformation & Customer Engagement	**Latest Review:** 09/05/2025	**Risk Type:** Data Protection/Information Security		
Mitigating Actions		**Responsible Officer**		**Current Effectiveness**
CR5.2	Compliance Tools: Improvement of monitoring activity and implementation of tools assessing near misses or user education opportunities. May include better alerts on data sharing within/without MS tenant, information tagging.	Head of Digital Transformation & Customer Engagement		Action Required
CR5.3	Supply Chain Management: Inadequate supply chain management decreases organisational resilience and information security. Manual review is slow and unresponsive. Procurement practice has been strengthened. Market testing and business case being pursued for software solution to manage supplier risk overview. This will be done via ITIG board during summer 2025. A risk review is also being initiated by the Head of Service on cyber risk in conjunction with Cyber Assessment Framework assurance findings.	Head of Digital Transformation & Customer Engagement		Satisfactory
Notes: CR5.3: Added in April 2025				

Business case being prepared for supplier management tool to better understand supplier risk and monitoring. Risk review underway as part of Cyber Assessment Framework external assurance improvement implementation plan.

CR7	Financial Sustainability	Current Severity: 4	Current Likelihood: 4	Current Risk Rating: 16
Risk Description: The council faces a range of financial challenges. We are subject to ongoing budget reductions whilst the cost of providing services continues to increase due to a range of inflationary pressures. We are also subject to single year budget settlements which impacts on the ability for medium term financial planning. We need to be able to plan and meet these challenges so that we can continue to deliver effective services and achieve the priorities we wish to.				
Risk Owner: Head of Finance, Property & Climate Resilience	**Latest Review:** 14/05/2025	**Risk Type:** Economic/Financial		
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**	
CR7.2	Identify Efficiencies: Taking proactive steps to increase income and reduce expenditure through efficiencies, vacancies that arise and delivering services in a different way.	Head of Finance, Property & Climate Resilience	Satisfactory	
CR7.5	Medium term planning: Work to close the budget gap is on-going. A range of options are being considered but Covid, business rates and uncertainty over fair funding review make the situation extremely challenging. To close the budget gap and maintain services: We continue to work with managers to reduce costs and explore new income streams.	Head of Finance, Property & Climate Resilience	Satisfactory	
Notes: A balanced budget for 2025/26 has been agreed. The future year estimated deficits remain at over £3m with significant uncertainty around Local Government funding following announcements of fundamental changed to grant funding formulae and the Business Rates retention scheme. Medium Term Financial Planning discussions are in progress with a strategy being developed that will mitigate longer term shortfalls.				

CR8	Quality of Planning Committee Decisions	Current Severity: 3	Current Likelihood: 2	Current Risk Rating: 6
Risk Description: Planning decisions are monitored at Government level nationally – the risk is to stay significantly below 10%. Over 10% could put a Local Planning Authority into special measures. Links to Performance Indicator measures 11a, 11b, 12a and 12b.				
Risk Owner: Director of Place & Economy	**Latest Review:** 15/05/2025	**Risk Type:** Reputation		
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**	

CR8.3	Regular informal planning committee meetings: Keeping planning committee informed of all appeals and upcoming planning policy, and any actions the Council is making.	DM Manager / Director of Place & Economy	Satisfactory
Notes: Appropriate training being given to Members to assist with decision making as well as informal discussions to assist members where required on upcoming legislation and planning changes.			

CR9a	**Risk Name: Reputational Impact of 3 Rivers**			
Risk Description: The soft closure of the company has now been completed. So the remaining reputational risks are that public debate in future inadvertently damages the value of assets by hindering the remaining sales. Public debate has, at times, included unhelpful and inaccurate statements about the company and the consequential impact on the council, with these inaccurate statements being repeated in wider circles. This risk is likely to continue until such time as all remaining assets are sold.				
Risk Owner: Chief Executive		**Latest Review:** May 2025	**Risk Type:** Reputational	
Mitigating Actions			**Responsible Officer**	**Current Effectiveness**
CR9a.1	Committee and council chairs feeling empowered to appropriately challenge poor behaviour during public meetings.		Chief Executive and Director of Legal, People & Governance	Satisfactory
CR9a.2	Elected members being comfortable with steps being taken and managing debate amongst themselves in a respectful way.		Deputy Chief Executive and Director of Legal, People & Governance	Satisfactory
CR9a.3	Updates on Sales Progress: Future updates on sales progress will be included in Cabinet financial monitoring reports		Deputy Chief Executive and Head of Finance, Property & Climate Resilience	Satisfactory
Notes: This risk was removed from the Corporate Risk Register in May 2025. The company undertook no operational activities in 2024/25 and was formally dissolved on the 26 November 2024 and all assets/liabilities were transferred to the Council during the 2023/24 financial year. As such it has been decided that this corporate risk can now be removed. Any updates on the assets transferred to the Council will be made in the standard financial performance reports received by the Cabinet.				

CR10	Cullompton Town Centre Relief Road	Current Severity: 5	Current Likelihood: 3	Current Risk Rating: 15
Risk Description: Inability to deliver the Cullompton Town Centre Relief Road				
Risk Owner: Group Manager for GED	**Latest Review:** 15/05/2025	**Risk Type:** Economic/Financial		

Mitigating Actions		Responsible Officer	Current Effectiveness
CR10.4	Land Assembly: Continue land assembly discussions so as to de-risk the project, assist in unlocking scheme delivery and increase the likelihood of securing funding.	Group Manager for GED	Satisfactory
CR10.5	Complementary projects: Continue to develop and deliver complementary projects such as the Railway Station and the Heritage Action Zone public realm scheme. This will support the case for investment in the town and demonstrate the capacity to deliver.	Group Manager for GED	Satisfactory

Notes:
Works are progressing well with the delivery of the relief road, which is anticipated to start in summer 2026. Land assembly is going well with the acquisition of four land parcels including the Tesco land. A Compulsory Purchase Order process to acquire other land parcels will commence imminently. Works continue to relocate the sports clubs that are effected by the road. Risk is expected to reduce further in the coming weeks as further progress is made with delivery.

CR11	Cost of Living Crisis	Current Severity: 4	Current Likelihood: 4	Current Risk Rating: 16
Risk Description: The high rates of inflation experienced in 2022 and 2023 have the potential to impact on council employees, residents, communities and businesses in Mid Devon. In turn this may affect the council in terms of increased costs, reduced council income, and put additional pressure on council services.				
Risk Owner: Head of Revenues, Benefits & Leisure	**Latest Review:** 30/04/2025	**Risk Type:** Financial, Social		

Mitigating Actions		Responsible Officer	Current Effectiveness
CR11.1	Benefit administration: The council delivers a range of benefits which support the financial position of our residents. This includes the Housing Support Fund, Discretionary Housing Fund, and the Exceptional Hardship Fund.	Operations Manager - Revenues Benefits and Recovery	Fully Effective
CR11.2	Council Tax Reduction Scheme: The council has introduced a new scheme (from 1 April 2023) which provides a more generous level of support.	Operations Manager - Revenues Benefits and Recovery	Fully Effective

CR11.3	Shared Prosperity Fund (SPF): The SPF and Rural England Prosperity Fund Investment Plans have a number of projects designed to support businesses and community organisations over Jan 2023 – March 2025. This includes grant schemes to support innovation and decarbonisation projects including those that reduce energy costs and increase productivity.	Growth and Regeneration Officer	Fully Effective
Notes: The risk remains the same because financial vulnerability is a very real thing still. Household Support Fund 7 is being bought in to help with food and energy costs. Council Tax Reduction scheme is circa £5m, and we also administer exceptional hardship and Discretionary Housing Payments. Council Tax collection whilst improved is hard to achieve.			

CR12	**Housing Crisis**	**Current Severity: 4**	**Current Likelihood: 3**	**Current Risk Rating: 12**
Risk Description: Failure to supply sufficient housing to meet Mid Devon's needs leading to increased homelessness and increased temporary accommodation (TA). There may be insufficient TA to meet demand and financial pressure is placed on the Council through increasing volume of and dispersed provision of TA. Co-linked failure to prevent homelessness occurring through increasing demand on resources, poor existing housing and failure to meet prevention duty/deliver mitigating actions including support to vulnerable residents. It is a statutory duty on the Council to prevent and provide relief/assistance to people threatened with or actually presenting as homeless. There is a local, regional and national shortage of affordable housing including social housing at the most affordable social rent level with a significant, growing waiting list of those registered on Devon Home Choice. Together with the current, ongoing cost of living crisis and other pressures this is leading to a growing housing crisis.				
Risk Owner: Head of Housing & Health	**Latest Review:** 27/05/2025		**Risk Type:** Financial, Social	

Mitigating Actions		**Responsible Officer**	**Current Effectiveness**
CR12.1	MDDC Housing Strategy 2021-2025: Coherent, corporate approach to providing affordable homes and maintaining housing quality	Head of Housing & Health	Fully Effective
CR12.2	MDDC Homeless Prevention & Rough Sleeping Strategy 2020-2025: Focus on rough sleeping, prevention, accommodation options and client support	Head of Housing & Health	Satisfactory
CR12.3	Strategic lobbying on social housing funding, flexibilities and homelessness pressures: Continued membership of DLUHC LA Strategic Housing Advisory Group	Head of Housing & Health	Fully Effective
CR12.4	Devon Housing Forum: Regional engagement and collaboration on affordable housing delivery and supported housing – continued engagement	Head of Housing & Health	Satisfactory

CR12.5	Local Plan housing delivery: Market provision of affordable homes	Forward Planning Team Leader	Satisfactory
CR12.6	Mid Devon HRA Development Programme: 500 new homes 2022/23 – 2026/27	Head of Housing & Health	Satisfactory
CR12.7	Temporary Accommodation: Opportunities to purchase HMO or similar shared market accommodation to meet TA needs/successful business cases made into capital programme. Two HMOs recently purchased, available 2023/24	Head of Housing & Health	Fully Effective
CR12.8	Empty Homes: Bringing empty homes back in to use/local leasing scheme for TA (link to CR12.7) or to alleviate wider	Head of Housing & Health	Action Required
CR12.9	Long-term development voids: Effective use of long-term development voids in Mid Devon Housing stock as TA where safe	Head of Housing & Health	Fully Effective
CR12.10	Ivor Macey House: Ongoing provision of Ivor Macey House supported TA accommodation (MDH HRA lease to G/F)	Head of Housing & Health	Fully Effective
CR12.13	Funding applications: Successful bids into DLUHC Rough Sleeper Initiative (RSI). £300k+ RSI secured over 3-year programme from 2022/23	Head of Housing & Health	Completed
CR12.15	Private Sector Homes for Ukraine: Team Devon Homes for Ukraine scheme Private Sector Housing transition support	Head of Housing & Health	Fully Effective
CR12.16	Residents Financial Support: Cost of living pressure, grants and signposted support, help with/access to benefits (https://www.middevon.gov.uk/residents/residents-financial-support/)	Head of Revenues, Benefits & Leisure	Satisfactory
CR12.17	Housing Assistance Policy (Better Care Funding): living well at home/homeless prevention and Home Start grants/loans	Head of Housing & Health	Fully Effective

Notes:
CR12.13 Marked as complete in May 2025.
New Cabinet Member will be briefed on the Housing Strategy for 2025 onwards. Homes Policy Development Group Value for Money and best practice report on Modern Methods of Construction modular building in Mid Devon Housing for Cabinet decision drafted.
Developing Devon Strategic Housing Pipeline (MDDC sites) further with Director of Place and Homes England. Ongoing successful bids into Homes England Affordable Homes Programme and Ministry of Housing, Communities and Local Government PBP with a number of new Housing Revenue Account development projects live/supported.
Successful draw down of Devon Care Leaver funding to support specific accommodation. Successful bid for additional Local Auhority Housing Fund 3 funding to support further temporary accommodation (TA) acquisition. Belmont Rd TA fully occupied, planning pending for St Pauls TA property for conversion to additional TA. Cabinet decision confirmed for purchase of further additional Tiverton property for TA - surveys and acquisition pending.

CR15	Corporate Property Fire Safety	Current Severity: 3	Current Likelihood: 3	Current Risk Rating: 9

Risk Description:
Upcoming changes in legislation will place more stringent demands on the council in terms of fire safety across its corporate property estate. Failure to meet these standards could lead to penalties being imposed by the Fire Service including fines, which would be an additional cost to any investment required to complete repairs.

The corporate property estate requires investment to ensure that significant fire safety risks, identified through external fire safety health checks, are mitigated. There are a number of sites which require fire safety checks. It is likely that these will identify fire safety risks that will require remediation. These will be addressed on a priority basis. As with any risk associated with fire, there is a potential for damage or loss to property and/or life.

Risk Owner: Chief Executive	**Latest Review:** 14/05/2025	**Risk Type:** Physical, Reputational, Financial

Mitigating Actions		Responsible Officer	Current Effectiveness
CR15.2	Investment Programme: Ensure that funding has been allocated and is drawn down to implement fire safety improvements.	Contracts and Services Manager	Satisfactory

Notes:
Initial works for fire dampers and escape routes is largely complete across Phoenix House and the three leisure centres. Some works will need to be finalised post completion of a separate project at Culm Valley.
Works at Old Road are out to tender.
Next stages of the programme of works are being considered.
Exe Valley is complete but has some delays to complete fire dampers and re-install fire expansion collars to pipe work in the plant room
Culm Valley Leisure Centre is 80% complete, this work is suspended for the moment awaiting some grant climate work to be complete, as it would mean doing the fire safety work twice.
Lords Meadow is underway and should complete within this fiscal year.

CR16	Building Control Service viability	Current Severity: 3	Current Likelihood: 4	Current Risk Rating: 12

Risk Description:
The NMD Building Control Partnership has been struggling with maintaining staffing levels for the past two years owing to a national shortage of skilled Building Control officers and skilled support staff. The service has continued to meet obligations by utilising agency staff. But changes presented through the Building Safety Act 2023 and the creation of the Building Safety Regulator are likely to result in further pressures in terms of attracting and retaining skilled permanent staff and in terms of service viability owing to additional duties placed upon the service in an increasingly challenging economic climate.

Risk Owner: Building Control Manager		**Latest Review:** 15/05/2025	**Risk Type:** Reputational	
Mitigating Actions			**Responsible Officer**	**Current Effectiveness**
CR16.2	Recruitment and retention: Address staffing and skills shortage and reliance on agency surveyors by continuing to seek to recruit new staff to the service, building on recent successes.		Building Control Manager	Satisfactory
CR16.4	Prepare for new reporting obligations: Continue to preparation for the introduction of the new reporting obligations for the BSR, due to commence in April 2024 – including ensuring appropriate systems are in place.		Building Control Manager	Satisfactory
Notes: Continue to trade with three vacant Inspecting positions, with one of these being filled with an agency inspector. Have one Technical Support vacancy and recruitment is well advanced.				

CR17	**Severe Weather Emergency Recovery**	**Current Severity: 4**	**Current Likelihood: 3**	**Current Risk Rating: 12**
Risk Description: When there is an event/incident which has potential to harm people or property a multi-agency response may be required in the form of declaring an “Emergency” through the Local Resilience Forum (LRF). This process is split into two phases; 1: The Response which is chaired predominantly by the police and is often heavily focused on the blue light services during/immediately following the event/incident. 2: Recovery which is chaired by the Local Authorities and is more focused on Local Councils working with communities to achieve a state of new normality. Because of this, MDDC has a large role to play within the Recovery Phase as a Category 1 responder of which there are many risk to the organisation from Financial, Reputational and Legal. This risk assessment is specifically looking at our most common event that escalates to an emergency which is Severe Weather including extremes in heat/cold, floods and wind etc.				
Risk Owner: Head of Housing & Health	**Latest Review:** 09/05/2025	**Risk Type:** Economic/Financial/Capacity/Reputation		
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**	
CR17.1	CMT Capacity: There is a member of CMT on rota. This role covers incident manager (response) or can be specifically assigned to the recovery phase including chairing/ co-chairing the LRF recovery group. This will be in addition to their regular responsibilities. Due to this, the Resilience Officer or another Corporate Manager can be brought in to assist with the multi-agency duties as required. With CMT now being five people, there is increased pressure and meeting this mitigation will be dependent on the CMT having no vacancies and	Head of Housing & Health	Satisfactory	

	being available during the recovery phase of an incident. This action will be kept under review.		
CR17.2	Adequate Continuity Planning: Each service area needs up to date Business Continuity Plans to effectively retain critical services during and after an emergency. Training will be provided and plans reviewed by the Resilience Officer.	Resilience Officer	Satisfactory
CR17.3	Overall Staff Capacity: Each business area will understand their critical functions and ensure they are functioning during recovery. Above this each service area will manage their own capacity to deal with recovery plus their business as usual through agency, overtime and mutual aid as detailed within their Business Continuity Plan.	Resilience Officer	Satisfactory
CR17.4	Out of Hours Capacity: Only CMT, Housing and Waste have Out of Hours within their contracts and so other services would need to rely on goodwill/ civic duty to cover any out of hours work during response and recovery. Paper detailing current out of hours gaps to be produced alongside a clear outline of which critical roles need some level of out of hours cover.	Resilience Officer	Action Required
CR17.6	Waste Collection Backlog: Due to the nature of the incident it is likely that there will be additional waste collection requirements in terms of debris, missed collections due to Health and Safety considerations, and additional waste from properties damaged by the weather (i.e. flooded properties). Additional agency staff/ overtime may be required alongside additional routes to meet the backlog and keep up with increased demand.	Head of People, Performance & Waste	Completed
CR17.9	Reputational damage: During the recovery phase of an emergency there will be a lot of differing priorities and expectations from our communities. This can lead to potential conflicts, disputes and confusion. The Communications Team will work to give clear messaging which is in line with the multi-agency communications plan. Sufficient media training will be given to the Leadership Team and key members of the Council to ensure the correct information is being released to the media and communities.	Head of Digital Transformation & Customer Engagement	Satisfactory
Notes: CR17.6 marked as complete in May 2025. Service level business continuity plans continue to be worked on. New training for Recovery will be rolled out at the end of 2025 and will develop capability to adequately manage an incident response phase.			

CR18	Housing Rent Error Correction	Current Severity: 4	Current Likelihood: 2	Current Risk Rating: 8
Risk Description: That the Council doesn't effectively manage the correction and repayment process associated with the recently identified housing rent error.				
Risk Owner: Head of Housing & Health	**Latest Review:** 27 May 2025	**Risk Type:** Reputational, Financial		
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**	
CR18.1	Officer Review Groups: These have been operating since the error was identified and regular update meetings are held with: the Regulator for Social Housing; the Department for Work & Pensions; and our external auditors Bishop Fleming	Head of Housing & Health and Head of Revenues, Benefits & Leisure	Satisfactory	
CR18.2	Key stakeholders: We also are communicating regularly with key local stakeholders: Churches Housing Action Team (CHAT); Citizens' Advice Bureau; Involve, etc.	Head of Housing & Health and Head of Revenues, Benefits & Leisure	Satisfactory	
CR18.3	Progress Updates: Regularly provided to the two relevant Cabinet Members and formal update reports will be made to Cabinet as and when required.	Deputy Chief Executive	Satisfactory	
Notes: Regulatory decision published by Regulator for Social Housing (RSH) who are satisfied with actions taken to address historic error. Regular monitoring arrangements in place between RSH and Council on plan implementation. Officer resources/team in place. No benefit refunds likely to commence June 2025, those impacted by Housing Benefits July-August 2025. Universal Credit/ Department for Work and Pensions (DWP) refunds await national policy decision by DWP via Treasury. Regular tenant, Homes PDG, Cabinet and Scrutiny updates being provided.				

CR19	Devolution and Local Government Reorganisation	Current Severity: 4	Current Likelihood: 5	Current Risk Rating: 20
Risk Description: The Government published its English Devolution White Paper in December 2024, which set out its intended directions for the future arrangements of local government service provision in England. It introduced the concept of 'Strategic Authorities' (SA), which it is intended will be large entities of circa 1.5m people – to be headed politically by a directly elected Mayor. It is not yet clear what expanded grouping will cover Devon, since our current Combined County Authority (CCA) covering Devon and Torbay is only around 975k (this could be a peninsula geography, expanded to include Plymouth and Cornwall, but this is not yet confirmed). How Mid Devon's influence is brought to bear in any new SA of this scale is not yet clear.				

In addition, the Government has made it clear that beneath these new Strategic Authorities, their desire is to see new councils created of a unitary structure and of a scale suitable to withstand future service pressures. This is described as being of 500,000 population, although exceptions below this are possible. In Devon, this would mean the restructuring of all current councils, with the likelihood that Devon County, the 8 districts, Torbay (unitary) and potentially Plymouth City council will all cease to exist in their current form by 2028, to be replaced by larger restructured council(s) covering the Devon area. Clearly, such a change will impact significantly upon corporate delivery and objectives as work is undertaken to identify what the future looks like and how to best restructure and realign service provision across Devon with a view to seeking to use this as an opportunity to enhance outcomes for our residents and businesses.			
Risk Owner: Chief Executive	**Latest Review:** 28/05/2025	**Risk Type:** Political, Legal, Financial	
Mitigating Actions		**Responsible Officer**	**Current Effectiveness**
CR19.1	Effective collaboration: To continue to work with other system leaders across Devon to maximise collaboration and share effort/resource where possible	Chief Executive (and Council Leader)	Satisfactory
CR19.2	Performing during transition: To use the well-established relationships across Devon to continue to meet strategic aims over the coming years while change is managed.	Chief Executive (and Leadership Team)	Satisfactory
CR19.3	Staff communication: To communicate regularly with staff to provide reassurance, explanation, updates and context, in order to minimise concern and maximise effective operational delivery across this changing organisational context.	Chief Executive	Satisfactory
CR19.4	Engage with all council members ahead of key decision points; 21st March and 28th November 2025 being notable known dates at this time.	Chief Executive (and Council Leader)	Satisfactory
CR19.5	Interim Plan: Submit interim plan to government alongside as many collaborating authorities as possible – completed alongside 7 of 8 districts, with both Torbay and Devon CC noting it as one of their proposed options.	Chief Executive (and Council Leader)	Complete
Notes: CR19.5: Added and marked as completed in March 2025. Awaiting feedback from Government on interim plan submission.			

Report for:	**Cabinet**
Date of Meeting:	8th July 2025
Subject:	**Adoption of the Blackdown Hills National Landscape Management Plan**
Cabinet Member:	Councillor Steve 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 2025-30 (adoption draft) Appendix 2 - Blackdown Hills National Landscape Management Plan 2025-30 Part B: Appendices (adoption draft) Appendix 3 - Blackdown Hills National Landscape Management Plan 2025-30 Part C: Delivery Plan (adoption draft) Appendix 4 - Strategic Environmental Assessment screening report Appendix 5 - Habitats Regulations Assessment screening report Appendix 6 – Equalities Impact Screening Assessment Appendix 7 - Blackdown Hills National Landscape Management Plan 2025-2030 Engagement and Consultation Report

Section 1 – Summary and Recommendation(s)

Mid Devon District Council together with other local authorities has previously authorised the Blackdown Hills National Landscape Partnership to undertake a review of the current Area of Outstanding Natural Beauty (AONB) Management Plan on their behalf, as required under Section IV of the Countryside and Rights of Way Act 2000.

Public consultation on the reviewed management plan took place in January to March 2025, and now adoption of the Blackdown Hills National Landscape Management Plan by Mid Devon District Council and the other relevant local authorities is required before the management plan is published and is submitted to the Department for Environment, Food and Rural Affairs (Defra).

Recommendation(s):

That:

1. **The Blackdown Hills National Landscape Management Plan (Appendices 1, 2 and 3) is adopted.**
2. **That delegated authority be given to the Director of Place and Economy in consultation with the Cabinet Member for Planning and Economic Regeneration to approve any editorial changes made to the Blackdown Hills National Landscape Management Plan.**

Section 2 – Report

1.0 Introduction

1.1 Under Part IV of the Countryside and Rights of Way (CRoW) Act 2000, Mid Devon District Council, together with other local authorities, namely Devon County Council, East Devon District Council and Somerset Council, is required to produce a Management Plan for the designated 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-plus extension to the review of the current Plan). Along with the other relevant local authorities, Mid Devon District Council has authorised the Blackdown Hills National Landscape Partnership to perform this duty on its behalf; the review and preparation of the new Management Plan is co-ordinated by the National Landscape team, who are hosted by Devon County Council, and has been previously reported to the Planning Policy Advisory Group on 22nd July 2024 and the Cabinet on 15th October 2024 (Minute 70).

1.2 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 AONB. The delivery of the Plan will be subject to funding availability 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 review cycle to ensure that the Management Plan remains fit for purpose and forward looking. The Management Plan is expected to contribute to Government's Environmental Improvement Plan (including protected landscapes targets) and key drivers include addressing 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 The review process has been a participatory one, with members of the Partnership Management Group, local authority officers and other stakeholders involved in agreeing the approach and identifying key matters for consideration, in advance of a wider public consultation on the draft management plan (held January to March 2025).

1.5 The Management Plan was also screened under both Strategic Environmental Assessment and Habitats Regulations Assessment regulations to determine whether policies in the Management Plan could have significant environmental effects, concluding that further detailed assessment was not required in either case.

2.0 About the Plan

Purpose

2.1 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.

2.2 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*.

2.3 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.

2.4 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 coordinate and prioritise resources.

Content

2.5 The Management Plan includes:

- A longer-term Vision - in summary; thanks to collaboration and positive change, by 2050 the Blackdown Hills will be a vibrant, thriving landscape where diverse communities flourish with a strong sense of place and wellbeing, deeply connected to the land and local culture. Sustainable living and working practices will underpin a prosperous local economy, while the distinctive patchwork of villages, fields, woodlands, and hedges will be maintained and enhanced. Farming and land use will be in balance with nature, building resilience and ensuring the sustainable provision of essential ecosystem services. Wildlife will thrive in a well-connected landscape, and the area's heritage will be celebrated and preserved. The natural beauty and wellbeing benefits of the area will be accessible to all.

- Four main themes;
  Place: Focuses on sustainable land use, farming, forestry, planning, and infrastructure to conserve the area's natural capital, landscape character, and historic environment.
  People: Aims to nurture thriving communities, support the local economy, improve accessibility, and promote inclusivity and engagement with the landscape.
  Nature: Prioritises habitat restoration, connectivity, and species conservation to create resilient ecological networks and contribute to national biodiversity targets.
  Climate: Addresses climate change mitigation and adaptation through nature-based solutions, carbon sequestration, and sustainable practices.

- Objectives, guiding principles, policies, targets and priority actions for each theme, and;

- A five year strategic delivery plan

Land use planning

2.6 The NPPF makes clear that National Landscapes (and National Parks) have the highest status of protection in the planning process and great weight should be given to conserving and enhancing their landscape and scenic beauty. The Levelling Up and Regeneration Act 2023 has amended 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. The Management Plan is relevant to the land use planning process, in relation to the preparation of local plans, neighbourhood plans and minerals and waste plans and the implementation of their policies, and in the determination of planning applications.

3.0 Public Consultation

3.1 A draft Management Plan was subject to an 8 week public consultation from 21 January to 19 March 2025. The consultation was promoted on the Blackdown Hills website and e-newsletter, and directly to partnership organisations, parish councils, surrounding town councils and all councillors (district and county) covering the Blackdown Hills geographic area. 25 representations were received, with six of those from parish councils and six from local residents. Respondents were generally supportive of the Plan's vision, and made helpful comments or sought the inclusion of additional information rather than raise significant concerns. The Engagement and Consultation report (see **Appendix 7** to this report) describes how the draft plan has subsequently been amended in response.

3.2 Following public consultation the draft Management Plan has been revised, and the final version of the Management Plan is required to undergo formal consultation with the statutory consultee, Natural England, before local authority adoption. The Blackdown Hills National Landscape Partnership has received confirmation from Natural England that the management plan meets the statutory requirement and has broadly followed the guidance for preparing a strategy for the management of the National Landscape and it represents good practice. Natural England has commented on the level of detail in the plan and has recommended that some sections could be shortened or moved to the appendix / annex. The Partnership has taken these comments into consideration and has agreed that a supporting summary document can be prepared to explain the content and purpose of the management plan.

4.0 Groups Consulted

4.1 The Management Plan was reported to the Planning, Environment and Sustainability PDG at its meeting on 10th June 2025, which has endorsed the recommendations in this report.

5.0 Next steps

5.1 The Management Plan has been adopted by East Devon District Council and it is expected it will adopted by Devon County Council in July and also by Somerset Council. Following these decisions, and subject to the recommendation in this report, the Management Plan will be fully designed and will be published on the Blackdown Hills National Landscape website with illustrated webpages and then will be formally submitted to Defra.

5.2 Implementation and delivery of the Management Plan will be monitored by the Blackdown Hills National Landscape Partnership, which in time will help to inform the next 5-year review. The Partnership will also undertake promotional work and engage with local communities and partner organisations to improve awareness and understanding of the National Landscape and the Management Plan's purposes and objectives.

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.

Equality 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 of the Management Plan has been undertaken by Devon County Council and this is included in **Appendix 6** to this report.

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 Officer
Date: 25 June 2025

Statutory Officer: Maria de Leiburne
Agreed on behalf of the Monitoring Officer
Date: 25 June 2025

Chief Officer: Stephen Walford
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 25 June 2025

Performance and risk: Steve Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 19 June 2025

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:

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Tim Youngs, Manager - Blackdown Hills National Landscape 01392 383608 tim.youngs@devon.gov.uk

Background Papers :

Appendix 1 - Blackdown Hills National Landscape Management Plan 2025-30 (adoption draft)

Appendix 2 - Blackdown Hills National Landscape Management Plan 2025-30 Part B: Appendices (adoption draft)

Appendix 3 - Blackdown Hills National Landscape Management Plan 2025-30 Part C: Delivery Plan (adoption draft)

Appendix 4 - Strategic Environmental Assessment screening report

Appendix 5 - Habitats Regulations Assessment screening report

Appendix 6 – Equalities Impact Screening Assessment

Appendix 7 - Blackdown Hills National Landscape Management Plan 2025-2030 Engagement and Consultation Report

Links:

Cabinet meeting 15th October 2024

Agenda for Cabinet on Tuesday, 15th October, 2024, 5.15 pm - MIDDEVON.GOV.UK

Planning, Environment and Sustainability PDG meeting on 10th June 2025

Agenda for Planning, Environment & Sustainability Policy Development Group on Tuesday, 10th June, 2025, 5.30 pm - MIDDEVON.GOV.UK

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Blackdown Hills National Landscape: Area of Outstanding Natural Beauty Management Plan 2025-2030

Adoption Draft

April 2025

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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 adoption. Ultimately the *Management Plan* will be published as pages 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 and forces for change.

Special qualities: Describes why the Blackdown Hills is special and the reasons for designation, and what we need to conserve and enhance it.

Vision to 2050: Sets out where we need to get to and the direction of travel.

There are then four sections which cover the themes of **Place, People, Nature, Climate**. The contents of each of these sections is organised in the same way under the following headings:

- **Objective(s)**: What we want to achieve.
- **Guiding principles**: High-level statements of intent and ambition needed to realise our vision, meet or exceed national targets and deliver what's needed for the Blackdown Hills.
- **Targets**: These targets relate to the Protected Landscapes Targets and Outcomes Framework which sets out national milestones for Protected Landscapes. The targets in this section set out what this management plan aims to achieve towards these national milestones (our apportionment), by 2030.
- **At a glance**: Headline findings from the State of the Blackdown Hills 2023 report (a compendium of data for the Blackdown Hills National Landscape, from Natural England, Defra, 2021 Census and other sources. It presents data collated in the autumn of 2023 to provide a snapshot of the area to help with the management plan review. Other nationally provided data is included where it adds to the picture)
- **Priorities for action:** Setting out what we intend to prioritise and how our actions will contribute to our targets. Together, these will form our five-year *Strategic Delivery Plan (2025-2030)*.
- **Policies**: These help to guide management, by setting out what needs to be done and how to achieve our objectives. Each one has a unique reference: Place have the

format **PL1**,2,3, etc, People policies are **PE1**, 2, 3, etc, Nature are referenced **N1**, 2, 3, etc, and Climate are **C1**, 2, 3, etc.

- **Context**: Describes the significance of each theme to the Blackdown Hills, with key issues, opportunities and challenges.

Delivery and monitoring: This includes information on how the plan will be implemented and progress measured and the role of the Blackdown Hills National Landscape Partnership in that.

Appendices: Presented in a separate document (*Part B*) for now but an essential part of the management plan, these set out more detailed information and data relating to:

- **Special qualities**, including an overview of associated natural capital and ecosystem services
- **Planning,** including general principles for development proposals, and major development
- **Climate**, including climate change adaptation plans, greenhouse gas emissions and soil carbon storage
- Protected Landscapes Targets and Outcomes Framework indicators and data
- **Strategic Delivery Plan,** which outlines the strategic priorities and high-level actions over the five-year period required to deliver the *Management Plan*'s ambitions, based on our priorities for action, included as a separate appendix (*Part C*) to enable it to be updated more readily through the plan period.

Chairman's Foreword

To be added

Bob Nelson – Chairman, Blackdown Hills National Landscape Partnership

National Landscape Partnership Commendation:

To be added

Chapter 1: Introduction

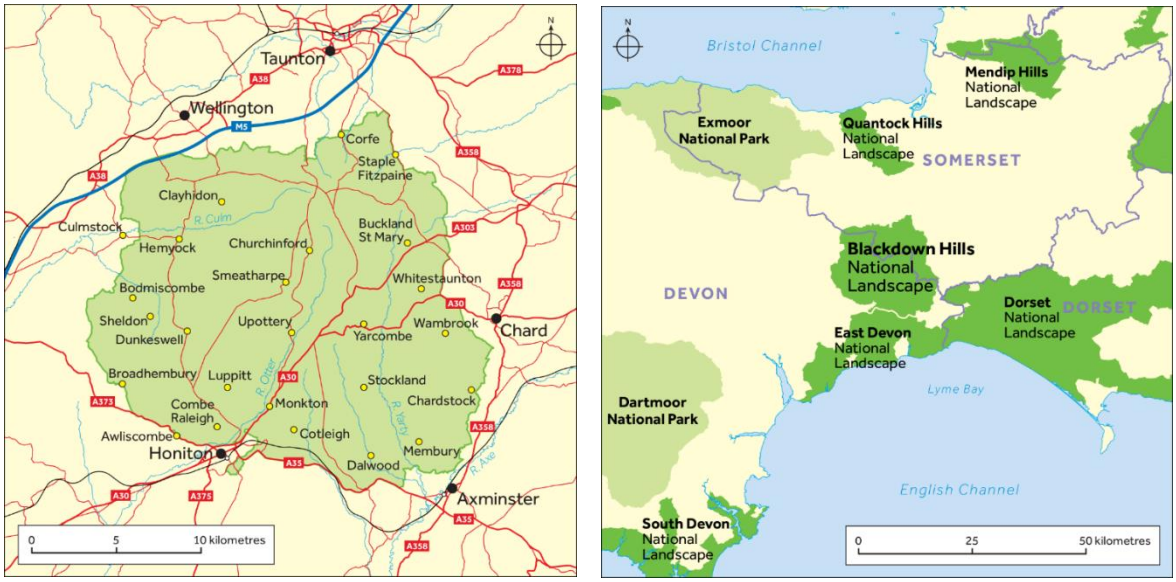
1.1 Purpose and role of the Management Plan

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 National Landscape is 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 Area of Outstanding Natural Beauty in 1991.



Source GIS data obtained from OS Open data and www.data.gov.uk October 2023

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 northward, 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 coordinate and prioritise resources.

Who is the Management Plan for?

This *Management Plan* has been prepared by the Blackdown Hills National Landscape Partnership on behalf of the relevant local authorities. However, it is a plan for the geographic

area of the National Landscape (and beyond), not a plan for the organisation. It provides a framework to help guide all activities affecting the conservation and enhancement of the National Landscape.

Everyone who has an active interest and role in the management of the Blackdown Hills National Landscape and in supporting the communities that live and work within it, has 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.
- **Blackdown Hills National Landscape Partnership organisations:** These organisations will have a key role in delivering and championing the *Management Plan* and it provides a focus for their partnership and collaboration.
- **Relevant authorities:** All public bodies and statutory undertakers (including local authorities, government and governmental organisations, parish councils, utility providers, and the National Landscape Partnership) have a *duty to seek 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, businesses and visitors:** Everyone who lives, works or visits 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** 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 and identifying actions to encourage greater understanding, appreciation and enjoyment of the Blackdown Hills National Landscape. This will lead to sustained investment, prosperity for our rural communities, protection and enhancement of biodiversity and climate resilience.

1.2 Guiding principles for partnership and management

- **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.**
- **Collaboration, coordination 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.**
- **The Blackdown Hills 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.**
- **The Blackdown Hills National Landscape Partnership 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.**

1.3 Policy context

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

Legislation

Areas of Outstanding Natural Beauty (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 **Levelling up and Regeneration Act 2023 (LURA)** strengthens the duty on partners such as local authorities and public bodies (known as relevant authorities) in relation to conserving and enhancing 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 duty to "*seek to further*" replaces the existing duty to *"have regard to"* the specified purposes. The duty does not prevent relevant authorities from undertaking their statutory

functions and discharging their legal duties and other responsibilities, but is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas, and is considered to be an 'active' duty rather than a passive one.

Defra have produced guidance for relevant authorities on seeking to further the purposes of Protected Landscapes.

Amendments brought about by LURA also grant 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).
- 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 to 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, the Protected Landscapes Targets and Outcomes Framework sets the ambition for how Protected Landscapes are expected to achieve three outcomes from the Environmental Improvement Plan (EIP23) which relate to these goals:

- 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). These targets should be seen as a minimum contribution rather than a limit on a Protected Landscape's ambition. Each individual Protected Landscape body, working with relevant local partners, will set their own individual contribution, which will be embedded in their management plan. Action will be coordinated by Protected Landscape bodies, 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 Areas of Outstanding Natural Beauty) 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 Landscapes Review produced 27 proposals across five themes of Landscapes Alive for Nature and Beauty, Landscapes for Everyone, Living in Landscapes, More Special Places and New Ways of Working. Some of the more strategic ones pertinent to management planning, include:

- *Areas of Outstanding Natural Beauty (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.*
- *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.*

- *A renewed mission to recover and enhance nature and a stronger mission to connect all people with our national landscapes.*

Other key policy influences

International context

This management plan is both underpinned by and contributes towards delivery of the United Nations *Sustainable Development Goals* set out in the 2030 Agenda for Sustainable Development and which address social progress, economic well-being and environmental protection.

Local Nature Recovery Strategies

The *Management Plan* needs to account for Devon Local Nature Recovery Strategy and Somerset Local Nature Recovery Strategy, which are both currently under development.

As responsible authorities, Devon County Council and Somerset Council are preparing these Local Nature Recovery Strategies as part of a statutory duty, enshrined in the Environment Act 2021, to work with stakeholders across the public, private and voluntary sectors to agree priorities for natures recovery, map the most valuable existing areas for nature, and established shared proposals for action to be taken to recover nature.

Climate action planning

The *Management Plan* will be informed and influenced by Somerset's Climate Emergency Strategy and the equivalent Devon Carbon Plan, plus the Climate Adaptation Strategy for Devon, Cornwall and the Isles of Scilly. In addition, partner local authorities have developed and updated climate strategies and action plans, including Mid Devon and East Devon

Local Plans

Planning policy and decisions that affect the conservation and enhancement of 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 Common Agricultural Policy (CAP). Broadly falling under the heading of Environmental Land Management, the key payment schemes of relevance for the Blackdown Hills National Landscape are the Sustainable Farming Incentive, Countryside Stewardship, Farming in Protected Landscapes (operated by the National Landscape locally) and Landscape Recovery.

Integrating the management of the natural and historic environment

Other major players in supporting actions around conserving and enhancing natural beauty include Natural England, Historic England, and the National Lottery Heritage Fund. A recent Joint Statement between the three organisations mirrors the aims of this management plan and highlights;

'We recognise that nature comprises habitats, species, geology, landscape, historic features, cultural connections, and the opportunities we have to connect with the environment. We acknowledge the complex interplay of these factors and the crucial role that heritage management practices can play in nature's recovery.'

1.4 Summary of forces for change: key issues, challenges and opportunities

The revised Management Plan needs to anticipate, understand and respond positively to a wide range of pressures and forces for change that may affect the area's natural beauty and special qualities and their management over the coming years. Some of the key ones are brought together and summarised here;

Climate emergency: The impacts of climate change are evident now and will impact all aspects of the Blackdown Hills and beyond so there needs to be greater focus on adapting to a changing climate and increasing resilience. The area can also play its part in reducing carbon emissions and other contributions to climate change mitigation.

Nature recovery: Urgent action is required to restore nature across the Blackdown Hills at scale, making nature more ecologically connected and resilient to climate change and other impacts through more, bigger, better and joined up places for wildlife. Statutory Local Nature Recovery Strategies are being prepared alongside this Plan, so we need to capitalise on this opportunity.

Environmental quality: Clean air, clean and plentiful water, and healthy soils are fundamental to nature recovery, as well as being the foundation for the ecosystem services that benefit those living in and around the National Landscape, and those visiting or working in it. The quality of these environmental resources is under pressure from a range of factors including development, road traffic, and land management practices. There is now more widespread understanding and acceptance of catchment-scale approaches to water management including natural flood risk management schemes which offer potential to restore natural ecosystems, improve water quality and reduce risk of flooding downstream.

Farming and land management: Agricultural transition and the move to environmental land management schemes is ongoing but still holds much uncertainty over the details of how this will be implemented and the funding that will be available.

Natural and cultural capital: The next few years are likely to see a growing trade in natural capital assets such as biodiversity, clean water, reduced flood risk, and stored carbon. These potentially provide new sources of income for landowners and managers in the Blackdown Hills who can provide a supply of these assets but there is uncertainty over the long-term value and credibility of some of these schemes.

Growth and development: The National Landscape designation means that the Blackdown Hills has not seen the same level of development as in other areas, but the area is not immune from development pressure. The demand for small-scale new build, conversion, renovation of existing structures and other minor development within the designated area

can incrementally and cumulatively change the character of the landscape and negatively impact on landscape quality, biodiversity, heritage and tranquillity. Significant new areas of housing and employment continue to be built close to the National Landscape, and further areas are being allocated in Local Plans.

Health and wellbeing: The health and well-being benefits of connecting with nature and the outdoors are now widely recognised and provide an opportunity for increased engagement with the National Landscape for both local communities and those in the surrounding areas. Yet the people that may benefit the most from better connection to the natural environment of the Blackdown Hills are often those that find in hardest to do so for a range of reasons.

Equality, diversity and inclusion: National Landscapes and National Parks are protected for the nation and should be available for everyone to enjoy. However, there are many people who face barriers that prevent them from visiting or engaging with the National Landscape and a proactive approach is needed to reach out to them and work with people within those communities to provide greater opportunities and awareness.

Policy, finance and delivery: Action to address these strategic challenges will require resources and partnership working, at a time of severe budgetary challenges, further local government transformation and continued political and policy uncertainty. It is likely that new sources of investment and funding will need to be found, including from the private sector.

Legacy and evolution: This Management Plan and the issues it seeks to address are not new. Management planning and collaboration have been at the heart of the Blackdown Hills National Landscape Partnership, in all its guises, for more than 25 years. Significant projects and initiatives from the recent past underpin much of today's work. For instance, the European Leader-funded *Local Products Strategy* and *Making it Local* programmes greatly affected the direction of land-based businesses, community groups, local food, the arts and other aspects of community life which this plan is seeking to influence going forward. Projects like the *Neroche Landscape Partnership* and *Blackdown Hills Natural Futures* paved the way for much which has followed.

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Chapter 2: Special qualities

PICTURES TO BE ADDED

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 Area of Outstanding Natural Beauty (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 important, charismatic 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, as described in *The Blackdown Hills landscape: A landscape assessment*. Countryside Commission, 1989 and set out below:

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 the connections 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.

This summary is supplemented by more detail and further information about the special qualities of the Blackdown Hills included in the appendices, which should be referred to for a thorough understanding of the distinctive characteristics and valued qualities that make up the Blackdown Hills special sense of place.

Chapter 3: 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, resilient to the effects of climate change, where:

- Thriving, diverse communities, with a strong sense of place and wellbeing, are sustained by a connection to the land, natural environment and a rich local cultural heritage. 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, energy, timber, clean water and other wider benefits needed by society, nurturing the area's rich resources for future generations.
- Wildlife is thriving and habitats are in good condition, restored and expanded, diverse and abundant, with species moving freely through a connected and healthy landscape.
- Our historic environment and rich historical legacy are better understood, conserved and celebrated. Our cultural heritage is widely recognised and valued and is continually evolving and growing.
- 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 make the most of the Blackdown Hills' ability to restore nature, grow healthy food and reduce carbon emissions while supporting vibrant and diverse rural communities: and fundamentally, making sure that conserving and enhancing the evolving landscape and special character of the Blackdown Hills is at the heart of all we do and the decisions we make.

Chapter 4: 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, regenerative 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.

4.1 Objectives – Place

- 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, archaeology, and buildings of architectural appeal, through sound custodianship.

4.2 Guiding principles – Place

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

- When contributing to meeting national targets, we will be mindful of primarily seeking to maximise outcomes relevant to the opportunities and needs of the Blackdown Hills.

4.3 Targets – Place

These are the Protected Landscapes 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

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

Applying the 3% target to the Blackdown Hills National Landscape would be an increase of 1,108 hectares (2738 acres). Therefore, 39.6 hectares (97.8acres) per year between 2022 and 2050, bringing the total amount of woodland to 9,302.93 hectares (22,988 acres).

Target 10

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

4.4 At a glance – Place

Headlines from State of the National Landscape report 2023:

- Satellite images suggest that there is very little light pollution in the Blackdown Hills National Landscape. There has been a noticeable increase of light spillage from Chard and Taunton areas, and increasing spillage from some communities within the area, noticeably Dunkeswell, Hemyock and around Yarcombe.
- National noise mapping suggests that the extent of traffic noise from major roads is limited in the Blackdown Hills National Landscape. The most recent data is for 2017.
- Particulate matter (PM2-5) levels low in the area but with a hotspot around Hemyock.
- Sulphur dioxide (SO2) levels are low in the area but with hotspots at Hemyock, Dunkeswell and near to Axminster.
- Surface water flood risk is low for most of the area.
- There are 770 Listed Buildings and 26 Scheduled Monuments. Of these, seven assets are at risk (2022); this is a minor improvement since 2019.
- There are ten Conservation Areas within the National Landscape. None are deemed as at risk.
- 78% of the National Landscape is under agriculture (2021).
- During the ten years to 2021 the number of farm holdings has remained at around 625.
- 42% of farms are less than 20 hectares in size and 44% are between 20-100 hectares in size.
- 48% of farms are recorded as lowland livestock grazing.
- Livestock numbers include; Poultry (1,006,928 animals), a 7% increase since 2016; Sheep (22,573 breeding ewes), a 6% decline since 2016; and Cattle (17,965 animals), with a 5% decline since 2016.
- Land in agri-environment schemes 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).
- The total annual value of agri-environment agreements was £2,113,434 in 2021; up from £1,017,856 in 2017.
- There are eight made (adopted) neighbourhood plans - all in East Devon.
- Approval given for one affordable housing scheme since 2017.

Additional data from Defra:

- The total length of river waterbodies within each status under the Water Framework Directive (WFD) is; 122 km moderate status (19 waterbody catchments); 24km poor status (9 waterbody catchments); 0.8km bad status (2 waterbody catchments)
- There are 4 groundwater bodies with high status under the Water Framework Directive and 3 in poor status.

4.5 Priorities for action – Place

This section sets out what we intend to prioritise and how these actions will contribute to each of our targets (see above).

Priorities for Target 5

- Increase the uptake of appropriate agri-environment scheme (AES) options, aiming for 75%+ uptake of Sustainable Farming Incentive (SFI), to underpin Countryside Stewardship and Landscape Recovery additional take-up (the three components of Environmental Land Management- ELM).

  PLTOF stat 12 indicates that the current uptake of agri-environment schemes is relatively low in the Blackdown Hills National Landscape at 18% (6,800 hectares). However, information from the local Natural England team (April 2025) indicates that the area under Countryside Stewardship and Environmental Stewardship (excluding capital grants) is approximately 11,821 hectares, 32% of the National Landscape. The total area under the Sustainable Farming Incentive (SFI) component of ELM is slightly higher at 13,884 hectares, 37.5 % across 291 agreements. The total number of agri-environment agreements (all schemes) is therefore 691 (excluding capital grants), covering 27,025 hectares. Total area under an agri-environment scheme can therefore be stated as up to 70% of the National Landscape (excludes capital grants). Although this level of take-up is encouraging, to maintain, add value to and increase this will require significant promotion and close working with the land management community, via trusted local advisers.

- Support and add value to schemes such as the Luppitt Landscape Recovery project (Landscape Recovery round 2) and the potential expansion of the Upper Axe Landscape Recovery project (round 1), as well as rolling out successful Landscape Recovery type management (large scale, long term environmental land management) to other areas in the Blackdown Hills.

Priorities for Target 8

- Undertake significant new tree planting, including orchards, restore undermanaged woodlands (to promote regeneration), and restore/reestablish 'trees outside woods' habitats, including hedgerows and hedgerow trees, seeking an additional 1108.76 hectares of tree canopy and woodland cover by 2050.

- Make significant Environmental Land Management (ELM) investment and provide woodland advisory support for willing landowners (including relevant authorities), while applying the 'right place right tree' principles. The Somerset and Devon Tree Strategies will help guide and support this.

Priorities for Target 10

- Review the reasons why the assets are still at risk. 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. This is a very small percentage of the designated heritage assets, however moving towards removing all of them from being at risk should be the goal.

Other priorities

- Step up the action needed to tackle Water Framework Directive (WFD) failures (now referred to as the Water Environment Regulations (WER), linked to drinking water quality and supply (including drought), surface quality and downstream coastal waters. This will involve working with land managers, water industry and other delivery partners. Working with the Regulators and Catchment Sensitive Farming officers, to focus attention on crops grown in 'high risk' locations and ensuring compliance with the Farming Rules for Water is important, to tackle the systemic failures of many of the waterbodies in the Blackdown Hills (as elsewhere in the south west).

- Continue to promote, deliver and advocate for 'mainstreaming' natural-based solutions as a mechanism to provide resilience to property and infrastructure, both within the Blackdown Hills National Landscape but also, importantly, downstream where major critical infrastructure is at risk from flooding and where building resilience is only possible through upstream interventions. Nature-based solution interventions rely on land managers to collaborate at scale. The Blackdown Hills National Landscape Partnership will play a key role here, to help support, incentivise and deliver. More detail on climate mitigation and adaptation can be found in the Climate section.

- Continue to support the farming and land management community through agricultural transition, via farm facilitation support programmes and by responding to ever-changing agricultural policy and the need/incentives to provide ecosystem services for society, including green finance opportunities such as nutrient credits and Biodiversity Net Gain. The National Landscape Partnership play a key convening, supporting and delivery role here.
- Undertake a desk-based appraisal of the historic environment in the protected landscape area, characterising and quantifying the resource and examining the extent of detailed investigation that has taken place to date. Use the results to identify where the most significant gaps in understanding are and how they can be addressed. The potential opportunities for community heritage and citizen science projects to help fill those gaps will also be identified. The last comprehensive desk top survey of the historic environment of the Blackdown Hills National Landscape area was in 1996, since when there have been very significant changes and new information which have helped to identify the significant extent of historic environment features in the area. An up-to-date study is an essential tool for strategic decision making concerning the historic environment.
- Continue to inform and influence planning policy, decisions and implementation through development of additional planning guidance and other tools and mechanisms, working with local planning authorities. Develop a shared understanding of the potential opportunities and effects of measures such as carbon offsetting, nutrient credits and biodiversity net gain in relation to conserving and enhancing natural beauty.

4.6 Policies – Place

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, forestry 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, timber and other agricultural and wood products where these are compatible with the National Landscape and purpose of designation.

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

PL9 Encourage well managed 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.
- Ensure that conserving and enhancing landscape and scenic beauty is given great weight.

PL16 All development affecting the Blackdown Hills National Landscape should 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.
- 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.

4.7 Context – Place

4.7.1 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). 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 project. 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.

Water resources

The Blackdown Hills forms part of the headwaters of the rivers Culm, Yarty (running to the River Axe), Otter and Tone/Parrett. 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, 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.

Water quality

Water quality is an essential driver of a thriving and resilient natural landscape full of nature, but it is widely accepted that some wastewater 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 and point pollution and nutrient enrichment are factors affecting water quality in the National Landscape and beyond. Indeed, pollution from rural areas is a significant factor in causing poor water quality in every catchment in the Southwest river basin district: phosphorus in rivers and sediment from agriculture are particular issues in the East Devon Catchment. The *Water Framework Directive (WFD) Regulations* are an important mechanism for assessing and managing the water environment in the UK, and has the core aim of protecting the water environments by preventing their deterioration and improving their quality. It does this by setting ecological targets ('good' status for all water bodies) and environmental objectives.

Addressing these issues and improving the water quality in the rivers and waterbodies of the Blackdown Hills is key. There are continuing and new initiatives that offer practical solutions and targeted support such as the Catchment Sensitive Farming programme operate across all the catchments. There is significant community interest in local water quality and initiatives to address the health of our rivers, see Making Rivers Better for example, and the Rivers Run Through Us project.

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, 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.

Air quality

The State of the National Landscape report indicates some relative hotspots for different forms of air pollutants, the reasons for which need further appraisal. However, it is the case that agriculture is a significant source of ammonia, mainly arising from diary, pig and poultry units, which are found throughout the Blackdown Hills. Ammonia can drift onto protected sites (SSSIs, etc) and sensitive habitats and add to nitrogen-based nutrient loads. Some Lichen species present in woodlands of the Blackdown Hills are especially sensitive to air pollution. Catchment Sensitive Farming is the main action to deliver reduction in ammonia emissions in agriculture.

4.7.2 Landscape

It is the diverse landscape, the distinctive villages, the historic environment and the tranquil rural setting that combine to give the Blackdown Hills its special sense of place.

Landscape character

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 – without losing the inherent valued character. 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).

LANDSCAPE CHARACTER MAPS

These assessments should be 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 annex.

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 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.

Setting

The setting of a National Landscape is the surroundings in which the influence of the area is experienced. Put another way, it is the area within which development and land management proposals (by virtue of their nature, size, scale, siting, materials or design) may have an impact, either positive or negative, on the natural beauty and special qualities of the protected landscape. 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 adversely 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.

4.7.3 Heritage and geology

In the Blackdown Hills National Landscape there is a very strong link between geology, archaeology and the modern landscape. The area 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. More information can be found in the Special Qualities appendix.

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 Protected Landscapes Targets and Outcomes Framework.

The designated heritage resource is only a tiny fraction of the overall heritage assets that combine to form the essential character of the landscape. Over 8,000 sites and buildings of archaeological and historic interest are recorded within the National Landscape on the Devon and Somerset Historic Environment Records (HERs). No information is currently available about the condition of this vast majority of the heritage resource and there has been no thorough assessment of the character of this resource and the level of understanding of it. There is therefore no firm basis upon which to formulate a historic environment research agenda for the area.

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. Water percolating through the Upper Greensand meets the impervious underlying clay then bleeds out to form springline mires, so characteristic of the Blackdown Hills, that in turn give rise to the headwaters of several river catchments. 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 iron production is thought to have started in the Iron Age, through the Roman period and continuing to Medieval time. There is evidence for a Roman clay industry 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 Blackdown Hills 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.

GEOLOGY MAP

4.7.4 Farming and land management

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, including carbon storage and nature recovery.

Farmers are under increasing pressure to respond to many factors that are influencing the way they use and manage land. 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, including green finance opportunities. 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

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:

- fix carbon from the air and store it in the soil matrix
- retain and clean water, and reduce flood risk
- Promote soil biology and support wildlife more widely
- recycle nutrients

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.

4.7.5 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, following the UK Forestry Standard (UKFS), and utilising landscape character assessment and Devon's Right Place Right Tree Guidance (both cover all the National Landscape). The UKFS, and its supplementary guides, are the basis for sustainable woodland creation and management in the UK.

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 woodlands were once managed but recent times have seen the reduction in coppice cutting, the cessation of timber harvesting resulting in a permanently closed canopy, or the planting of ancient woodland with conifer. All of these result in a decline in biodiversity which can be rectified by the application of sensitive management.

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 and other wood products such as wood fuel, 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.

In the Blackdown Hills, commercial sustainable timber production, 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, unifying landscape feature of 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.

4.7.6 Planning and development

Villages, hamlets, farmsteads, individual buildings and their settings form a vital element of the character of the Blackdown Hills. The planning and design of any development, large and small, both within the National Landscape and around it, is of key importance in maintaining the landscape and scenic beauty of the area.

Planning policy

Planning decision-making in the National Landscape 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 and parish councils also have a duty to seek 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. The latest version was published in December 2024 and confirms that:

- National Landscapes [and National Parks] have the highest status of protection in the planning process.
- great weight should be given to conserving and enhancing their landscape and scenic beauty.
- the scale and extent of development should be limited.
- development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- when considering applications for development permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest (see below and in the appendices).

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 Blackdown Hills National Landscape, where possible, new developments should incorporate sustainable technology, renewable energy sources, and energy and water efficiency as standard; and the use of locally sourced materials, including sustainably grown timber and wood products, should be encouraged.

(Also see the Climate section, including policies). However, these need to be balanced with retaining a locally distinctive built environment with a strong local vernacular - special qualities of the area. There may also be implications related to sourcing local materials to be managed, 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 Blackdown Hills. 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, great weight should be given to conserving and enhancing landscape and scenic 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 190. However, a footnote confirms that 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. 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 appendices.

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. Government planning policy guidance explains that management plans help to set out the strategic context for development and provide evidence of the value and special qualities of the area. It goes on to highlight that they may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.

The *Management Plan* provides supporting evidence and complementary policy guidance for local plans and can be referenced to inform development proposals and decisions. The plan is

supplemented by topic-specific guidance, such as the *Blackdown Hills Design guide for houses* and *Good lighting guide*. It is expected that these will be reviewed and updated, and further design/planning guidance will be prepared during the life of this plan to reflect new agendas and priorities.

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 considerations and development should:

- Respect the importance of the setting of the National Landscape,
- Respect the importance of the setting of individual settlements, hamlets and historic farmsteads,
- Maintain the existing pattern of fields and lanes,
- Maintain the integrity of the hedgerows and irreplaceable habitats, including ancient woodland, and ancient and veteran trees, 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. This may apply to development some distance from the National Landscape as well as within.

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 requirements, 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.

4.7.7 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 Blackdown Hills. 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 and farm 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 Blackdown Hills 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 seek 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.

Chapter 5: 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.

5.1 Objectives – People

- 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 appropriate opportunities to explore and enjoy the Blackdown Hills countryside and its special qualities that are compatible with conserving and enhancing natural beauty are available to all and that everyone feels welcome.
- To commit to eliminate discrimination, provide equal opportunities, and challenge prejudice and foster good relationships between diverse groups in and around the Blackdown Hills.

5.2 Guiding principles – People

- 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.
- 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.
- We must respond to the needs of people living and working within the Blackdown Hills, in nearby towns, and nationally, and everyone should feel supported and

welcome to access, cherish and enjoy the natural environment and the heritage of the Blackdown Hills.

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

5.3 Target – People

This is the Protected Landscape Targets and Outcomes Framework target 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".

5.4 At a glance – People

Headlines from State of the Blackdown Hills National Landscape report 2023:

- 2% of the area is defined by Natural England as publicly accessible.
- 436.5 kilometres of public rights of way: 340 km footpaths, 86 km bridleways, 9 km restricted byways and 1 km byway open to all traffic.
- 2021 Population: 14,130
- 68% of population is of working age (20-74 years old) – down from 71% in 2011.
- 56% are employed – down 11% from 2011, 2% are seeking work and 42% are not seeking works – up 12% from 2011.
- There has been a 7% decline in land-based employment since 2011 and a 1% decline in distribution, hotel and restaurants.

- Between 2011 and 2021 employment in manufacturing and construction has increased by 6% and professional and public sector employment has increased by 3%. Employment in transport and communication has remained the same.
- Between 2011 and 2021, there has been a 5% growth in managerial and professional jobs, and a 5% decline in the skilled trades, administrative and caring/leisure occupations. All other sectors remain the same.
- 83% have good or very good health while 4% have bad or very bad health (no changes since 2011).
- 75% with no long-term physical or mental health conditions, 17% considered themselves as disabled under the Equality Act and a further 8% with long-term physical or mental health conditions.

5.5 Priorities for action – People

This section sets out what we intend to prioritise and how these actions will contribute to each of our targets (see above).

Priorities for Target 9

- 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.
- The Blackdown Hills National Landscape Partnership to take positive action to increase diversity within the management group and the voices reflected in decision making.
- Promote activities, including organised activities, which support the physical, mental and social health of residents and visitors.

Other priorities

- Collect data so that we have a clear definition and better understanding of equity, diversity and inclusion issues relevant to the Blackdown Hills. This includes undertaking further work to deepen our knowledge of the population within the Blackdown Hills and the surrounding area and responding accordingly.
- Build relationships among local community organisations and agencies to collaborate on inclusion.

- Undertake an audit of the current ways in which the qualities of the landscape and historic environment are presented to the local population and the visiting public. Use the results to identify the opportunities for methods and locations for improvement in the presentation of information and explore ways that the local community could be actively involved.
- Collaboration among partners to champion and find solutions to practical issues widely affecting communities, such as high-speed broadband connectivity and highway maintenance.

5.6 Policies – People

A landscape for all

PE1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of sensitive and sustainable opportunities for volunteering and 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 and historic environment resource of the Blackdown Hills to benefit the health and well-being of residents and visitors which are compatible with conserving and enhancing natural beauty 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.

5.7 Context – People

5.7.1 A landscape for all

The Landscapes (Glover) Review published in 2019 included proposals to increase the inclusivity and diversity of all the work of Areas of Outstanding Natural Beauty (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 both 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.

We are fortunate to have several organisations, groups and social enterprises throughout the Blackdown Hills who are passionate about making those connections and supporting people to engage with nature to benefit their health and wellbeing, such as the well-established Neroche Woodlanders. The Blackdown Hills National Landscape Partnership has experience of partnership projects with other Somerset protected landscapes and Somerset Wildlife Trust over many years supporting individuals and groups to understand and enjoy the benefits nature connection can have for their physical and mental health.

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.

Some research for the Blackdown Hills National Landscape Partnership in 2021 relating to earlier socio-economic data (based on 2011 Census data) offered a 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 ranged 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.
- 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 extend 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 across the wider 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 district also has high food insecurity levels.

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.

5.7.2 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 skydiving, gliding, motorsports and bushcraft. There is scope to better 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 Blackdown Hills 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 (including Culm Garden Village) 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 (part of the National Cycle Network).

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, such as through the Parish Paths Partnership (P3) groups in Devon. 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 to provide independent advice on 'the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area'.

5.7.3 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 are 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.

5.7.4 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 connected 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 connections 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 identify 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 having 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 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 and 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.

Chapter 6: 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 species. However, this very mosaic means that some habitats are fragmented, and condition of some are fragile. Measures to restore and connect habitats will benefit wildlife and deliver other ecosystem services.

6.1 Objective – Nature

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.

6.2 Guiding principles – Nature

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.

- People need nature, wherever they are and whatever their ability or knowledge.
- Soil, air and water are the foundations of a healthy natural environment.
- 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.)
- The natural landscape of the Blackdown Hills should be seen as a functioning whole.
- The Lawton *Making Space for Nature* principles of 'better, bigger more and joined' ensure that habitat networks are fit for purpose for nature to thrive in and adapt to climate change.
- 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.
- More wildlife habitat in the Blackdown Hills will deliver many wider benefits.
- 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.

- 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.
- We will contribute to delivering the Devon Local Nature Recovery Strategy and Somerset Local Nature Recovery Strategy.
- We will embrace and promote the latest conservation practice where appropriate.

6.3 Targets – Nature

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 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 against Target 1 outside of these nature conservation designated sites.

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".

30 by 30

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.

6.4 At a glance - Nature

Headlines from the State of the Blackdown Hills National Landscape report 2023:

- There are 16 designated Sites of Special Scientific Interest (SSSI) in the Blackdown Hills National Landscape, occupying 640 ha (1.73%) of its area.
- 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).
- There are 4,724.43 ha of priority habitats covering 12.8% of the Blackdown Hills National Landscape (note that priority habitat data is incomplete in places and more work is needed on verification).
- There are 5,380 ha of woodland covering 14.5% of the Blackdown Hills National Landscape.
- There are 867 ha of ancient woodland covering 2.3% of the Blackdown Hills National Landscape.
- 45% of woodland is in active management.
- The overall ecological quality of the majority of rivers in the National Landscape is moderate, none are in good or high status.
- Non-statutory designated sites for nature cover around 8.5% of the Blackdown Hills National Landscape.

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

A focus on nature recovery

We know that delivering nature recovery in England with the current resources is failing.

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 and 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 (a map showing the Nature Recovery Areas can be found in the plan).

The 14 'Nature Recovery Areas' (NRAs) identified in the delivery plan 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 2021

Blackdown Hills Nature Recovery Plan visualisations

6.5 Priorities for action – Nature

This section sets out what we intend to prioritise and how these actions will contribute to each of our targets (see above).

As guided by the Lawton hierarchy, Target 4 is considered the top priority for Nature followed by Targets 2 and 3, then Target 1. This is because it is 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.

Priorities for Target 4

- Restore all priority habitat to a favourable condition.
- Enhance the data baseline, particularly for areas outside designated sites, including refresh / ground-truthing priority habitat maps to improve their accuracy and coverage. Note that the priority habitat inventory (PHI) is not considered definitive and underestimates the true extent of priority habitat. Other habitat inventories also underestimate the extent of habitat within mosaics.
- Conserve the characteristic 'patchwork' landscapes and habitat features for the Blackdown Hills National Landscape, particularly springline mires. 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.

Priorities for Targets 2 and 3

- Undertake significant work to move sites from 'unfavourable recovering' to 'favourable'. This will require more condition surveying by Natural England and more incentives through Environmental Land Management (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).
- 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),
- Ensure that activities for nature are consistent with actions arising from the Local Nature Recovery Strategies in Devon and Somerset.

Priorities for Target 1

- Focus on habitat creation in the highest priority areas, as per the Lawton hierarchy. [See habitat network opportunity/targeting map]

Actions to restore or create wildlife-rich habitat outside SSSIs and undertaken through established or future schemes, such as agri-environment schemes or government grants, will count towards Target 1.

This is because they are 'reasonably expected to lead' to the creation/restoration of wildlife-rich habitat that is of sufficient quality for the purpose of measuring progress towards Target 1.

Note that in the Protected Landscapes Targets and Outcomes Framework datasets, the new categories of 'Grass moorland', 'Fragmented Heath' and 'Good quality semi-improved grassland' are not actually considered to be priority habitats (by Defra and Natural England) and would therefore count towards Target 1 (not target 4).

The Blackdown Hills National Landscape will have an important role to play in the additional element of Target 1 that relates to hedges: "create and restore 30,000 miles of hedgerows each year by 2037". The Blackdown Hills has a well-connected and dense lattice of hedgerows (one of its special qualities), with 4,440 km of hedges across the landscape.

30 by 30

The Blackdown Hills National Landscape is one of six national pilots developed by the Protected Landscapes Partnership, in conjunction with the National Landscapes Association. The outputs from this work are summarised as:

The current 'potential' of the Blackdown Hills National Landscape to achieve 30 by 30 is 20% of the total area (i.e. restore **all** extant priority habitat)

Of this, the current 'actual' (meeting 30 by 30) is 10% of the total Blackdown Hills National Landscape area (3,700ha), with the majority of this in Somerset.

Therefore, to reach 30 by 30, 10% more priority habitat would need to be re-created in the Blackdown Hills National Landscape i.e. c3,600ha. Although this figure is higher than the PLTOF target 1 figure, it should be the ambition via this Management Plan to achieve it.

Champion species

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 Blackdown Hills National Landscape's special qualities (such as springline mires) or that indicate the health of a well-connected landscape.

The champion species for the Blackdown Hills National Landscape are:

- 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.

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 align with the Local Nature Recovery Strategies, but this needs to be an iterative process and so a review maybe needed part way through the Management Plan cycle, to ensure alignment.

6.6 Policies - Nature

N1 Use the Lawton *making space for nature* principles of 'better, bigger, 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 Species of conservation concern will be conserved. Targeted action will be taken to support the recovery of champion/priority/indicator species.

N4 All public bodies within the Blackdown Hills National Landscape 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.

N5 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.

N6 Increased recreational pressure will be resisted at locations where unacceptable damage or disturbance to vulnerable habitats or species is likely to arise.

6.7 Context – Nature

6.7.1 Designated sites

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

In the Blackdown Hills, 2020 figures show that only 19% (122ha) are deemed to be in 'favourable' condition, with 75% 'unfavourable recovering' (477ha).There are some specific technical reasons for so few sites being favourable (often because parts of sites do not fully meet the 'standard' site/habitat expectations), but the large percentage of sites in a recovering condition is positive. This category has seen a significant increase since 2008 when 40% (254ha) were classed as unfavourable recovering, and over the same period the area considered unfavourable declining has moved from 118ha to none.

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. This is located at Quants in the north of the Blackdown Hills, selected for its population of marsh fritillary butterflies, which occur on springline mire habitat mosaics. However, this species is now locally extinct at this site. 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 southeast 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 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.

The Somerset Levels and Moors Special Protection Area (SPA)/ Ramsar is located several kilometres to the north, fed in part by the tributaries of the Tone and Parrett that flow down from the north scarp of the Blackdown Hills.

6.7.2 The ecosystem approach

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 (purple moor grass and rush pasture community) and other wet grasslands, with mire and bog communities in more restricted sites such as Hense Moor.

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.

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.

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.

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.

6.7.3 Right habitat, right place

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 are 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.

Habitat network enhancement

In the map below, the shaded areas show the optimal locations for making the habitat network 'better, bigger, more and joined'. The higher the density of coloured shading the greater the opportunity. The red lines show the borders of four National Landscapes: Blackdown Hills, Quantock Hills, East Devon and Dorset.

[note that the image below is an illustrative placeholder for now]

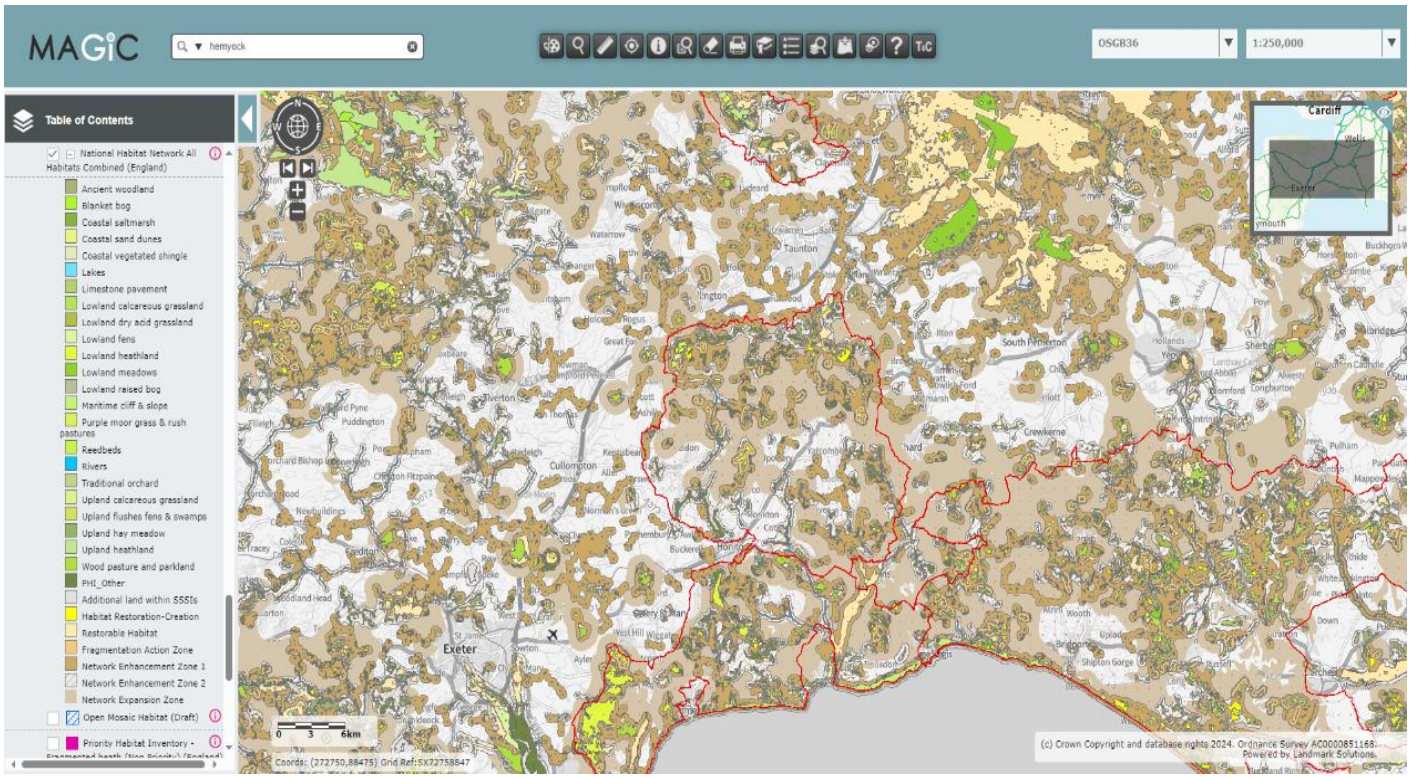
MAGIC
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Table of Contents
National Habitat Network All Habitats Combined (England)
Ancient woodland
Blanket bog
Coastal saltmarsh
Coastal sand dunes
Coastal vegetated shingle
Lakes
Limestone pavement
Lowland calcareous grassland
Lowland dry acid grassland
Lowland fens
Lowland heathland
Lowland meadows
Lowland raised bog
Maritime cliff & slope
Purple moor grass & rush pastures
Reedbeds
Rivers
Traditional orchard
Upland calcareous grassland
Upland flushes fens & swamps
Upland hay meadow
Upland heathland
Wood pasture and parkland
PHI_Other
Additional land within SSSIs
Habitat Restoration-Creation
Restorable Habitat
Fragmentation Action Zone
Network Enhancement Zone 1
Network Enhancement Zone 2
Network Expansion Zone
Open Mosaic Habitat (Draft)
Priority Habitat Inventory -
Taunton
Exeter
Cullompton
Crewkerne
South Petherton
Cardiff
Wells
0 3 6km
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Chapter 7: Climate

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 such as 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. As such, climate is very much a cross-cutting theme throughout this plan, however this part provides a focus for key objectives and principles.

7.1 Objectives – Climate

- 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.
- To 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.

7.2 Guiding principles – Climate

- The climate and nature crises are intrinsically linked.
- We need to work urgently to mitigate climate change, including storing a much more carbon in our landscape, especially in soils and trees.
- 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.
- Fossil fuels must be phased out as an energy source, and energy consumption must be minimised wherever possible.
- We need to take measures to help our communities adapt to climate change.

- The climate change transition process must be democratic, fair and involve all communities, ensuring that no communities are unduly impacted.
- We need to move beyond growth being the only measure of economic progress.

7.3 Targets – Climate

We will contribute to the following targets set out in the Protected Landscapes Targets and Outcomes Framework (PLTOF):

Target 6

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

Target 7

"Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050".

The national target is to restore 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) and therefore we will not be directly contributing to the national target. However, we can still play an important part in peat restoration and carbon capture given that "*soils with peaty pockets (scattered pockets)"* cover an area of 10,017 hectares (24,752.5 acres) which is 27% of the Blackdown Hills National Landscape.

Note that Target 8 - *"Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline)"* is included as a target for mitigating and adapting to climate change in PLTOF. However, we have included it in the Place theme as trees, woodland and hedgerows are an essential element of the character of the Blackdown Hills landscape, providing many ecosystem services.

7.4 At a glance – Climate

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

- A 10% reduction in total greenhouse gas emissions across the local authority areas between 2017 and 2021.
- Three operating renewable energy generation sites in the Blackdown Hills National Landscape.

- A 5% increase in carbon accumulating in the soils and vegetation between 2017 and 2021.
- 9-millimetre increase in annual rainfall and a rise of 0.3°C in annual temperature over the last 30 years (this masks the increasing occurrence of extreme events).

Additional data from Department for Energy Security and Net Zero 2024: Greenhouse gas emissions data

See appendices for full data. The greenhouse gases covered by these statistics are carbon dioxide, methane and nitrous oxide.

Between 2005 and 2022, the estimated total greenhouse gas emissions in the Blackdown Hills National Landscape saw a decrease from 276.4 to 204.8 ktCO2e. The figures are shown in 'kilo tonnes of carbon dioxide equivalent' – ktCO2e. Levels dropped for the following sectors:

- **Industry**: 5.2 to 3.0 $ktCO_2e$.
- **Commercial**: 7.3 to 2.7 $ktCO_2e$
- **Public sector**: 0.9 to 0.3 $ktCO_2e$.
- **Domestic**: 41 to 19.7 $ktCO_2e$.
- **Agricultur**e: 199.8 to 166.6 $ktCO_2e$.
- **Waste**: 11.2 to 3.9 $ktCO_2e$.
- The estimated total greenhouse gas emissions for **Transport** *increased* over the same time period from 57.3 to 58.3 $ktCO_2e$.
- **Land Use, Land-Use Change and Forestry (LULUCF)** activities are both a source and sink for carbon dioxide and a source of methane and nitrous oxide. Generally, emissions are produced from conversion of land to cropland and settlements and are removed through forest growth and conversion of cropland to grassland. Emissions to the atmosphere are given as positive values; the removals from the atmosphere are given as negative values. LULUCF activities in the Blackdown Hills have consistently been a sink between 2005 and 2022, with a figure between -46.3 and -50.6 $ktCO_2e$ per annum.

  During the same period:

- **Per capita emissions** dropped from 21.70 to 14.40 tCO_2e (tonnes of carbon dioxide equivalent).
- **Emissions per km²** dropped from 0.7 to 0.6 tCO_2e.

7.5 Priorities for action – Climate

Actions to address the climate emergency are cross cutting, and it is imperative that they should be an integral aspect of all plans, projects and programmes operating across the Blackdown Hills.

Actions for climate change mitigation

Produce a comprehensive **pathway to net zero** for the Blackdown Hills National Landscape following these steps agreed among the National Landscapes family:

- 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 Land Use, Land-Use Change, and Forestry (LULUCF).
- Assess which areas the Blackdown Hills National Landscape and key partners can impact directly, and address emissions that are outside the jurisdiction of the National Landscape by engaging with local authorities, businesses, or other relevant stakeholders.
- Quantify the depth and date range of the remaining peat deposits and the total carbon they contain.
- 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.
- 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.

Carrying out a carbon assessment of emissions will create a carbon footprint for the Blackdown Hills National Landscape. This alone will not produce a pathway to net zero, but it will allow us to understand the key areas of emissions and begin targeting areas for emissions reduction, whilst quantifying the amount of carbon sequestration required to meet net zero.

Actions for Climate Change Adaptation

Produce a **climate change adaptation management plan** for the Blackdown Hills National Landscape, linked with this management plan by 2028, and all future plans. See appendices for further information.

Refine the **climate adaptation risk assessment matrix** already drafted, which identifies the climate risks in the Blackdown Hills National Landscape and use the information to develop the required climate adaptation plan for the area, for example:

- In the natural environment, risks identified include reduced and changed biodiversity – loss of trees, loss of pollinators, loss of water, flooding, loss of soil.
- Actions to address this include mainstreaming soil health and regenerative farming and forestry techniques, in order to build resilience of soils, that will in turn help with infiltration of water and storage of carbon, and well-connected habitats which allow species to move to new climate spaces (e.g. different aspects, slopes, feeding and breeding opportunities, shade/ sun) and avoid local extinctions.
- For Built Environment, Community and Economy, risk includes increased flooding and pressure on infrastructure, especially medical. Pressure on sewerage and loss of drinking water.
- Actions to address this include 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. Also, tree and shrub canopies which 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.
- Actively consider areas where renewable energy installations maybe considered appropriate, where impacts can be minimised and more easily mitigated. Take care in relation to anaerobic digestor (AD) plants, which may distort cropping patterns in an area dominated by permanent grassland, which could lead to ploughing up of grassland and the planting of crops such as maize.

Work collaboratively to address the risks and actions identified in the Blackdown Hills National Landscape climate change adaptation plan, seeking to highlight where actions from Devon, Cornwall and Isles of Scilly Adaptation Plan and Somerset Climate Emergency Strategy to build resilience and allow communities and the natural world to adapt, can be most effective.

7.6 Policies – Climate

For completeness, this set of policies should also be cross-referenced to the other thematic sections of this plan.

Education and behaviour change

C1 To transition to net zero, support communities, businesses and individuals to collectively make changes to their behaviour, such as energy use, eating habits, travel choices, waste disposal and climate adaptation planning more, in addition to using technological solutions.

Energy supply

C2 Use less energy to reduce the amount of new energy infrastructure required to meet net zero.

C3 Transition to renewables; energy used within the area needs to rise to near 100% renewable by 2050. The transition to low carbon and renewable energy should be undertaken in a way that seeks to further the conservation and enhancement of the natural beauty of the Blackdown Hills National Landscape, and is compatible with its special qualities, landscape character and heritage value.

Land and food: Nature based solutions

C4 Reduce Greenhouse Gas (GHG) emissions through encouraging sustainable farming practices and maximise carbon storage in the environment by encouraging interventions such as tree planting and peaty soil restoration.

C5 Develop demand for sustainably produced food.

Develop a resilient local economy and use of resources

C6 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.

C7 Reduce emissions from unavoidable biodegradable waste and wastewater treatment.

Built environment: buildings retrofit and energy efficiency

C8 Develop and encourage measures which reduce energy usage in existing buildings and improve energy efficiency for all buildings using low carbon technology in all refurbishment,

regeneration and improvement schemes. As part of the transition, new buildings need to be net zero as soon as possible.

Sustainable transport

C9 Reduce the need to travel and support the development of sustainable low carbon transport and active travel options, while working to avoid leaving any community isolated.

7.7 Context – Climate

7.7.1 Responding to climate change

Our planet's climate is changing and warming at an accelerating rate. Recent years have seen the UK's hottest ever recorded temperatures 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.

Climate change is, in part, driven by human land use. 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 in the Blackdown Hills, for example by reducing flood risk in the river catchments 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-offs 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 Hills farmed landscape, modest changes in land management practices could have a large cumulative effect on carbon storage.

There is a role for everyone working in the Blackdown Hills to promote and implement lower carbon lifestyles, through organisations' own activities to minimise their carbon footprint, for example by promoting local food, choosing venues accessible by public transport, and holding online meetings.

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 in the Blackdown Hills to reduce their dependency on fossil fuels, for example through renewable energy, reduced energy use, and more opportunities to share transport. 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 us all, 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.

Some climate change mitigation and adaptation measures have the potential to adversely affect the natural beauty of the National Landscape, but with careful design and implementation, many of these measures can not only conserve but also enhance natural beauty. The challenge is to develop a pathway to net zero which also conserves and enhances natural beauty. Notably, large-scale renewable energy developments can have a negative impact on landscape and scenic beauty, presenting potential conflicts between the need to tackle climate change and the statutory purposes of the National Landscape. Small-scale individual or community-based renewable energy schemes may be suitable provided there is no significant detrimental effect on the environment. A useful resource to inform consideration of the impact of renewable energy developments is Devon Landscape Policy Group Advice Note 2. *Accommodating wind and solar pv developments in Devon's landscape* (2025), which covers all of the Blackdown Hills National Landscape.

7.7.2 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.

If we can slow down the rise in greenhouse gases, we can slow down the pace of climate change and avoid its worst consequences.

Globally, nationally, and locally, 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 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.

7.7.3 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 landscape.

Climate change adaptation refers to actions taken to adjust to a warming world and reduce the risks associated with it. 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 Protected Landscapes to produce climate change adaptation

management plans, embedded in or linked with their management plans by 2028, and in all future plans.

National Landscapes climate adaptation risk assessments

A template has been created with the National Landscapes family, to provide a common approach for conducting climate adaptation risk assessments. While this approach will not directly produce a climate adaptation plan, it will identify the climate risks in each National 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 each National Landscape, identify policy responses and relevant local stakeholders, and set out planned actions for the short, medium and long term. The template provides the flexibility for the risk assessment process to be carried out according to the needs of each individual National Landscape.

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

- Identify the key assets and features of the landscape.
- Assess 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.

7.7.4 Carbon stores and stocks

Protected Landscapes contain some of the UK's most important carbon stores, including significant tracts of peatland, woodland and hedgerows providing important carbon sinks for achieving net zero.

In 2022, the National Association of Areas of Outstanding Natural Beauty (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 and 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 (that is the overall capacity of a habitat to remove

80

or release carbon from or to the atmosphere) present within all 34 National Landscapes in England, with an emphasis on priority habitats. The carbon audit focussed on carbon stocks and stores in the soils and biomass of priority and non-priority habitats within the National Landscapes. Along with a few additional sources, the audit was based on two main data sources:

- The NATMAP (the National Soil Map of England and Wales) carbon dataset which maps soil carbon stocks (at 1:250,000 scale).
- Available literature summarised within the 2021 Natural England Research Report 094) titled Carbon Storage and Sequestration by Habitat: A Review of the Evidence (NERR094).

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 geographic 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 (especially associated with woodland).

Therefore, the main recommendation from this research is to preserve current high levels of carbon storage where they exist as well as to 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, other ecosystem services, livelihoods, and net emissions of greenhouse gases.

Fieldwork was also undertaken as part of the carbon audit, comparing soil organic carbon contents represented by the NATMAP carbon dataset to soil samples dug within three different National Landscapes: Blackdown Hills, Shropshire Hills and High Weald. This showed that when local samples of soil carbon taken from fields were compared against the national NATMAP data there was a strong correlation, which therefore gives us confidence in the NATMAP data and using it for decision making, such as where to focus land management advisory effort. Further detail is included in the appendices.

Outputs for the Blackdown Hills:

Total soil carbon stored (0-150cm depth of soil, medium value): **7,740,695 tonnes/ carbon**-based on NATMAP data

Of this, the amount stored in *non-priority* habitats is 6,257,900 tonnes/ carbon and the amount stored in *priority* habitats is 1,482,795 tonnes/ carbon

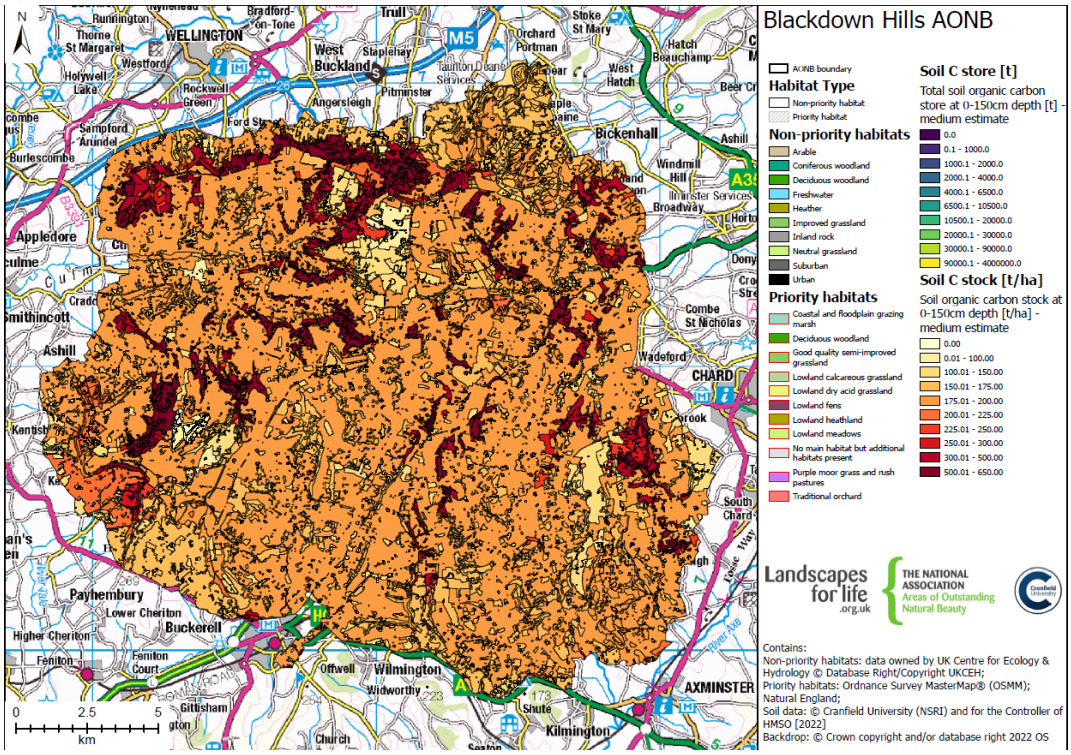
Based on literature, biomass carbon (stored above ground in vegetation) = 851,731 tonnes/ carbon (medium estimate for t/ C)

Based on literature, carbon flux = 571.10 **loss** of CO2e [CO2e gains (-)/losses (+) per habitat area]

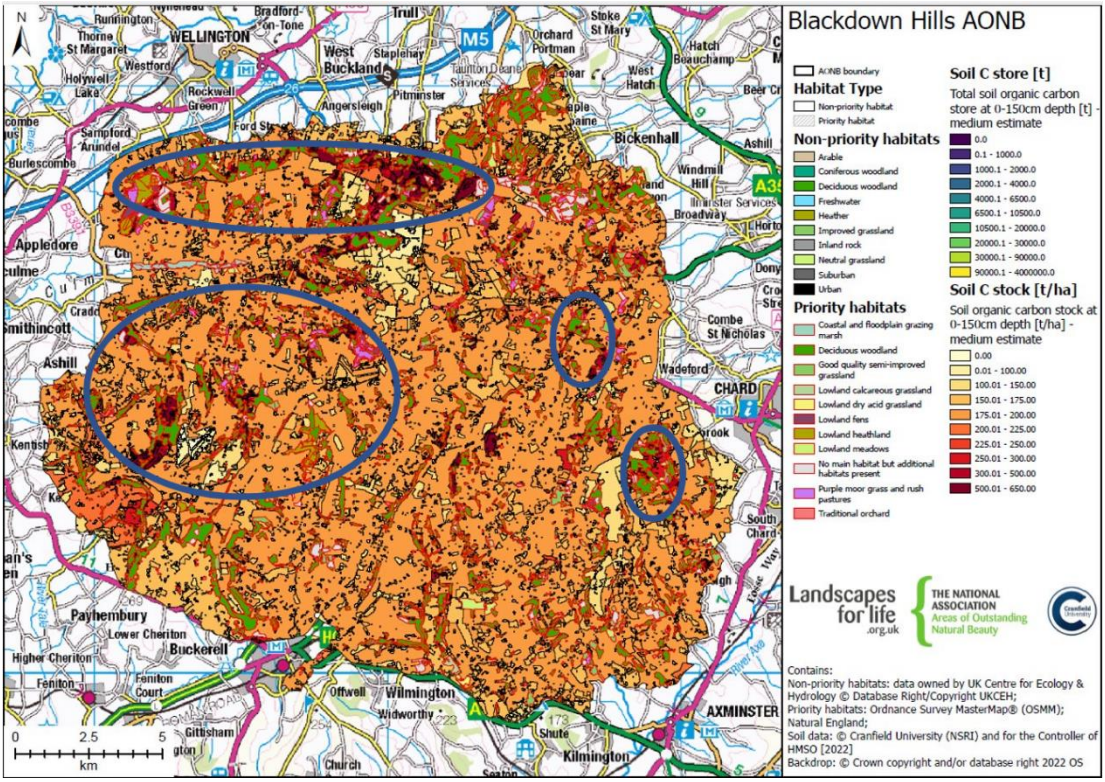
Based on literature, an alternative carbon flux metric= 164.90 **loss** of carbon [C gains (-)/losses (+) per habitat area]

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 on map 2). In other words, areas of high-density soil carbon in the Blackdown Hills strongly coincide with the areas of high biodiversity importance and therefore we need to prioritise these areas for restoration of habitats.

[note that the following images are an illustrative placeholder for now]



Map 1: Density of soil carbon stocks



Map 2: Priority habitats shown over soil carbon stocks

A further follow-on piece of work, building on the Cranfield carbon audit and metric study was undertaken in the Blackdown Hills to explore how this may be used to inform land management decisions, [*Soil Organic Carbon in the Blackdown Hills National Landscape: 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 Beauty.* Fred Constantine Smith with support from Gavin Saunders, Richard Smith and Tim Harrod, May 2023]. Further information can be found in the appendices.

Report 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.
- 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 'Whimple' 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

Offering much potential to help mitigate climate change, these existing carbon stores need to be protected and restored to maximise carbon sequestration. Restoring characteristic habitats like springline mire and wetland, managing woodland 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 Hills farmed landscape, modest changes in land management practices could have a large cumulative effect on carbon storage.

Chapter 8: Delivery and monitoring

8.1 Implementation

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 continues to be imperative to enable new and innovative working relationships 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 seek 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.

Collaboration and working together with others to achieve success underscores all National Landscape Partnership work. A key function of this plan is to encourage coordinated action in the Blackdown Hills and ensure an integrated policy context. Sitting across two counties, activities in the Blackdown Hills are very often delivered by several different organisations – or different parts of the same organisation – based on administrative boundaries. This can lead to local issues being marginalised, different approaches being taken in neighbouring areas, and divergence of policy, for instance.

The National Landscape Partnership is made up of organisations and interest groups that work together towards achieving the vision through delivering the aims, objectives and policies of this Management Plan. Policy direction and implementation of the Management Plan is guided by the Partnership Management Group. This is comprised of appointed representatives from the local authorities and several representatives elected from the statutory and non-statutory organisations, local groups and parish councils within the Blackdown Hills. The Partnership is supported by a small staff team, and it is enormously valuable that the Partnership can call on topic-specific working groups and forums drawn from the local community, interest groups, businesses, and the statutory and non-statutory agencies to coordinate action and help to deliver projects that conserve and enhance the Blackdown Hills.

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

A recurring message arising from consultation is the need for the Blackdown Hills National Landscape Partnership to do more to communicate and promote the purpose of designation and to promote understanding and appreciation of the National Landscape and its special qualities. The continued protection and enhancement of the Blackdown Hills' landscape, biodiversity and historic assets can only be achieved by successful communication of their significance and value to a variety of audiences, from landowners, local communities and businesses to local authority officers and infrastructure providers.

8.2 Monitoring and evaluation

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

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

A role of the Blackdown Hills National Landscape Partnership is to collate, monitor and evaluate the actions that happen from 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

As set out throughout this plan the framework 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 overall progress towards the targets and outcomes in the Framework. The Blackdown Hills National Landscape Partnership can question and challenge the national position when necessary, where data anomalies and gaps are apparent from the picture on the ground locally.

Management reporting

Qualitative monitoring of action is relatively straightforward; 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, often with its own monitoring requirements. In addition, 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. 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.

8.3 Strategic Delivery Plan

The Strategic Delivery Plan is a key part of the *Management Plan* and can be found in the appendices. It outlines the strategic high-level actions over the five-year period required to deliver the *Management Plan*'s ambitions across Place, People, Nature and Climate, based on the priorities for action set out in earlier sections of this plan.

It has been included separately in the appendices to enable it to be updated more readily through the plan period.

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Blackdown Hills National Landscape

Blackdown Hills National Landscape: Area of Outstanding Natural Beauty Management Plan 2025-2030

Adoption draft

April 2025

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Appendix 1

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 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 bathhouse at Whitestaunton and several ‘Romanised’ farms. Extensive evidence is emerging for Romano-British farms and field systems, that are particularly visible on LiDAR in marginal areas such as on and around the edges of commons/moors - some of these though may be Medieval.

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. There was extensive iron mining on the plateau, influencing the creation of plateau commons and improved/enclosed former heath, and now wooded upper slopes. The cratered landscape of opencast iron workings can still be seen in places on the plateau tops, such as Culm Davy, and iron slag finds are widespread.

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. Deliberate planting of former extraction pits with trees and orchards started in the medieval period and has contributed to the extensive pattern of small, dispersed woodland.

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.

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. The lanes themselves host traditional roadside feature such as fingerposts and milestones. 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 Upottery 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, rich history of human settlement 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 northern parts of the Blackdown Hills. In the past rough boggy parcels of land across the Blackdown Hills too agriculturally-poor for farming became used as a source of fuel and materials. Known as turbaries, local people had common rights to cut turf and dig peat for fuel and they are now important habitats valuable for wildlife, often designated as SSSIs and nature reserves.

This immense variety, with patches of valuable habitat scattered throughout the landscape, is notable; these include flower-rich meadows, spring-line mire, wet woodland, heathland, calcareous grassland, ancient woodland, fen, and bog, connected by ancient hedgerows. 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.

Spring-line mires are a key feature of the Blackdown Hills National Landscape and comprise a matrix of plant communities and wetland features that support a range of specialist plants and animals, including insectivorous plants such as oblong-leaved sundew and pale butterwort. They are formed where the Greensand meets the clays, supporting priority habitats of wet grassland, heathland, mire (i.e. purple moor-grass and rush pastures) and woodland habitats. Linear features such as hedgerows are of value as wildlife in their own right and comprise important habitat for a range of notable and protected species including brown hairstreak butterfly and hazel dormouse. They have a role in landscape connectivity linking habitat patches, forming a network that allows species to move through the landscape, particularly in the provision of foraging habitat for mobile species such as bats. In places, rivers and streams host mammals including otters, beavers, and water vole, invertebrate including white clawed crayfish, and fish, including lampreys.

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 list 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 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 for further understanding of the contrast and diversity of the designated landscape and its management requirements.

Natural Beauty component: Landscape quality

- A managed landscape sculpted and maintained by the stewardship of generations of those who work the land
- Undeveloped skyline of the northern scarp slope is a prominent feature in views from the Vale of Taunton and beyond
- Rich mosaic of diverse and interconnected semi-natural habitats; a patchwork of woodland, heathland, meadow and mire linked by hedgerows
- Clear, unpolluted streams that meander down the valleys to feed the Yarty, Otter, Culm rivers
- Ancient and veteran trees in hedgerows, fields, and woodland
- A settled landscape with a strong sense of time-depth containing farmsteads and small scattered villages well related to the landscape

Natural Beauty component: Scenic quality

- The elevation and long, panoramic views out from the Blackdown Hills create a sense of detachment from surrounding towns and transport corridors
- Unspoilt, panoramic views across flat-topped plateau and straight undisturbed ridge tops and over hidden valleys
- A well-wooded pastoral landscape with a strong pattern of hedgebanks and hedgerow trees
- Pattern of regular, larger-scale enclosure fields on the plateau contrasts with the smaller, curving medieval fields on the valley slopes
- Majestic avenues of beech trees along northern ridges
- 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

- Wellington Monument is a key landscape feature identifying the Blackdown Hills over a very wide area in all directions

Natural Beauty component: Relative wildness

- A sense of remoteness enhanced by the exposure of the plateau and more intimate extensive woodland of the upper slopes and hidden valleys
- Wide open spaces provide exposure to the elements; big sky, windswept places, contrasts of sunlight and shadow

Natural Beauty component: Relative tranquillity

- 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
- Places to enjoy natural sounds; the melody of the song thrush and skylark, the call of buzzards
- Dark night-time star-filled skies contrasting with the light pollution of the surrounding towns

Natural Beauty component: Natural heritage features

- One of the finest, most extensive plateaus in Britain; a distinctive landform that contrasts with the surrounding lowlands to the east, north and west
- The underlying Upper Greensand geology is unique in Britain
- The presence of straight, uninterrupted ridges are evident as a visual backdrop over a wide area
- Distinctive spring-line mires located at uniform height around the upper slopes of the valleys
- 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
- Ancient, species-rich hedges with many hedgerow trees and flower-rich banks; colourful displays of primrose and bluebells in spring
- A network of ancient semi-natural woodland linked by hedgerows support a thriving dormouse population
- Streams and rivers are home to otters, beavers, lamprey and the vulnerable white-clawed crayfish

Natural Beauty component: Cultural heritage

- 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
- Ancient hillforts are prominent features on the ends of the plateau ridges
- Mining remains from the once internationally significant whetstone industry and extensive evidence of ironworking
- Three World War Two airfields and remains of their associated buildings are found on the high, flat land of the plateau
- A community with a strong sense of place closely linked to the land and its management, with a particularly strong tradition of hedge laying
- A landscape that has inspired artists from the early 20th century Camden Town Group to the Blackdown Hills Artists and Makers of today

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

Natural capital and the elements of natural beauty have a natural overlap: 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 Blackdown Hills 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 2

PLANNING

Part A: 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).

Part B: Major Development

Note that all paragraph and footnote references relate to the December 2024 version of the National Planning Policy Framework (NPPF)

Footnote 67 of the NPPF clarifies that:

'For the purposes of paragraph 190 [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 190 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 that 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 Blackdown Hills 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 purpose 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.

Appendix 3

CLIMATE

Part A: Climate Change Adaptation Management Plans

The government's 2023 Climate Adaptation Strategy under the Third National Adaptation Programme (NAP3) requires all 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.

Background

The UK government's third National Adaptation Programme (NAP3) introduces the requirement for all Protected Landscapes to produce Climate Change Adaptation plans by 2028. Whilst the plan can be independent of management plans, it may be easier and beneficial to an authority to complete their Adaptation plan alongside or as part of their management plan. The plans will have regard to relevant guidance and UK government policy.

Protected Landscapes are some of England's most important areas for delivering on national climate goals, including the government's target to reach net zero emissions by 2050. Adopting Climate Adaptation Plans will be essential in protecting England's Protected Landscapes from the impacts of climate change. Alongside the publication of NAP3, climate change adaptation should be considered in each phase of delivering on the ambitions set out in Management Plans. Climate Adaptation should be considered in all aspects of the Authority's remit, not just the impacts on Nature, but on the People and the Place itself.

Timing

Climate Adaptation plans are to be completed on a 5-year cycle, preferably in line with Protected Landscape management plans. Further to this each Protected Landscape Authority will have a climate adaptation plan in place and published by 2028.

Content

A Protected Landscapes Climate Adaptation Plan should contain action focused policies looking to adapt areas of the designation where climate change is projected to have an impact. Each plan will take the form of the following:

- Identification of areas within the designation that are vulnerable to the impacts of climate change.
- Identification of any new risks since the last Climate Adaptation plan.
- Understanding of the predicted impact and identifying measures for adaptation.
- Evidence on adaptation actions and outcomes and how these interact with socioeconomic drivers and Net-Zero
- Production of an action plan to implement the adaptation measures, ensuring these are SMART.
- Climate Change risk management – governance on how each risk identified is managed.

Those preparing the plans may wish to consider the government's latest climate change risk assessment (CCRA3). This was informed by the Climate Change Committee's independent assessment of climate risk.

When identifying actions, ensure there is a responsible owner, even if that is not the Protected Landscape management body – e.g. if infrastructure such as roads may be at risk of damage from extreme weather, work with the responsible authority to identify adaptations.

Those preparing the plan should think broadly on areas at risk across the Protected Landscape designation and be ambitious in the adaptations they can identify.

Publication / Follow up: Climate Adaptation Plans must be submitted to Defra and Natural England once completed and published. Each subsequent climate adaptation plan produced should note in detail the progress that has been made in implementing these adaptations.

An initial **climate adaptation risk assessment matrix** has been prepared for the Blackdown Hills National Landscape, and the tables are included on the following pages:

Blackdown Hills National Landscape climate adaptation risk assessment matrix

Natural Environment						
Area of Impact	**Headline Projection and impact**	**Risks and Opportunities**	**Mitigation**	**Likelihood**	**Impact**	**Risk**
Variety of grasslands	Drier summers, increased likelihood of drought	Unpredictable forage yields and grazing.		5	-4	-20
	Drier summers, increased likelihood of drought	Deeper rooted plants, including grasses favoured.		5	2	10
	Drier summers, increased likelihood of drought	Flora reducing or ceasing nectar production	Element of scrub to provide partial shade & wildflower grasslands on a variety of aspects[12]	5	-4	-20
	Hotter summers, increased likelihood of extreme heat	Unpredictable forage yields and grazing.		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Stock kept inside longer, resulting in increased demand for forage		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Loss of soil		5	-4	-20
	Jetstream driven longer winters and milder wetter summers.	Longer growing season		4	3	12

	Jetstream driven longer winters and milder wetter summers.	Difficulty harvesting		4	-4	-16
	Less snowfall, frost and ice	Longer growing season (grass grows when temperature is above 4°c		5	3	15
	Increase in the risk of wildfires	Loss of grazing, natural habitat, loss of wildlife		4	-3	-12
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Soil erosion, flooding, grazing unavailable		5	-3	-15
	Shift in the growing seasons	Longer growing season (grass grows when temperature is above 4°c		5	3	15
	Milder winters and changes to pest and disease pressures	Loss of pollinators		5	-4	-20
	economic pressures leading to intensification of agriculture	Reduction in grassland leading to diversification		5	-2	-10
Dark skies	Drier summers, increased likelihood of drought	n/a		5	0	0
	Hotter summers, increased likelihood of extreme heat	n/a		5	0	0
	Milder wetter winters, increase in	n/a		5	0	0

	rainfall intensity and frequency					
	Jetstream driven longer winters and milder wetter summers.	n/a		4	0	0
	Less snowfall, frost and ice	n/a		5	0	0
	Increase in the risk of wildfires	n/a		4	0	0
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	n/a		5	0	0
	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and disease pressures	n/a		5	0	0
	economic pressure leading to intensification of agriculture	Increase in population density, loss of character. Thoughtless developments. Many impacts of climate change will have indirect effect on dark skies.		5	-4	-20
Biodiverse small rivers	Drier summers, increased likelihood of drought	Loss of water, reduced river levels or rivers dry up. Potential total loss of aquatic life		5	-4	-20
	Hotter summers, increased	Reduction of water.		5	-4	-20

	likelihood of extreme heat					
	Milder wetter winters, increase in rainfall intensity and frequency	Higher flow, erosion, loss of biodiversity. Increase in invasive species		5	-3	-15
	Jetstream driven longer winters and milder wetter summers.	Flooding, erosion, rivers changing course, silting		4	-4	-16
	Less snowfall, frost and ice	n/a		5	0	0
	Increase in the risk of wildfires	n/a		4	0	0
	Rising sea levels	Salinity levels and flood plains may be affected		5	-1	-5
	Increase in the intensity and frequency of storms	Flooding, erosion, rivers changing course, silting		5	-4	-20
	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and disease pressures	Loss of biodiversity, new pests and diseases		5	-3	-15
	economic pressure leading to intensification of agriculture	More abstraction, more pollution.		5	-4	-20
Bat population	Drier summers, increased likelihood of drought	Reduction in number and ranges of invertebrate species and loss of habitat		5	-3	-15
	Hotter summers, increased	Reduction in number and ranges of		5	-3	-15

	likelihood of extreme heat	invertebrate species				
	Milder wetter winters, increase in rainfall intensity and frequency	Reduction in number and ranges of invertebrate species		5	-3	-15
	Jetstream driven longer winters and milder wetter summers.	Reduction in feeding opportunities		4	-4	-16
	Less snowfall, frost and ice	n/a		5	0	0
	Increase in the risk of wildfires	Risk to roosts		4	-4	-12
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Risk to roosts. Risk to feeding opportunities		5	-3	-15
	Shift in the growing seasons	Reduction in number and ranges of invertebrate species at the right time.		5	-3	-15
	Milder winters and changes to pest and disease pressures	Hibernation impacted		5	-2	-10
	economic pressure leading to intensification of agriculture	Reduction in habitat		5	-3	-15
Veteran trees	Drier summers, increased likelihood of drought	Death and dieback of veteran trees		5	-4	-20
	Hotter summers, increased	Change in supported biodiversity.		5	-4	-20

	likelihood of extreme heat					
	Milder wetter winters, increase in rainfall intensity and frequency	More fungal diseases		5	-3	-15
	Jetstream driven longer winters and milder wetter summers.	Change in supported biodiversity.		4	-3	-12
	Less snowfall, frost and ice	Not predictable		5	0	0
	Increase in the risk of wildfires	Loss of ancient trees		4	-3	-12
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Soil erosion, trees falling		5	-4	-20
	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and disease pressures	Risk to key species, e.g. ash dieback, processionary moth etc.		5	-3	-15
	economic pressure leading to intensification of agriculture	n/a		5	0	0
Ash dominated woodlands	Drier summers, increased likelihood of drought	Death and dieback of trees. Particular risk to young trees		5	-4	-20
	Hotter summers, increased likelihood of extreme heat	Change in supported biodiversity.		5	-4	-20

	Milder wetter winters, increase in rainfall intensity and frequency	More fungal diseases		5	-3	-15
	Jetstream driven longer winters and milder wetter summers.	Change in supported biodiversity.		4	-3	-12
	Less snowfall, frost and ice	Reduction in viability of some species that require chilling period		5	-4	-20
	Increase in the risk of wildfires	Loss of woods		4	-3	-12
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Soil erosion, trees falling		5	-3	-15
	Shift in the growing seasons	Not predictable		5	0	0
	Milder winters and changes to pest and disease pressures	Risk to key species, of ash dieback.		5	-3	-15
	economic pressure leading to intensification of agriculture	n/a		5	0	0
Wildlife diversity	Drier summers, increased likelihood of drought	Reduction / change in biodiversity		5	-4	-20
	Hotter summers, increased likelihood of extreme heat	Reduction / change in biodiversity		5	-4	-20

	Milder wetter winters, increase in rainfall intensity and frequency	Change in migration patterns. Reduction in pollinators.		5	-4	-20
	Jetstream driven longer winters and milder wetter summers.	Change in migration patterns. Reduction in pollinators.		4	-4	-16
	Less snowfall, frost and ice	Change in migration patterns		5	-2	-10
	Increase in the risk of wildfires	Loss of habitat.		4	-3	-12
	Increase in the risk of wildfires	Rejuvenation of woodlands.		4	3	12
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Loss of habitat		5	3	15
	Shift in the growing seasons	Changes to food chains. Reduction in pollinators		5	-4	-20
	Milder winters and changes to pest and disease pressures	Reduction / change in biodiversity		5	-3	-15
	economic pressure leading to intensification of agriculture	Reduction / change in biodiversity. Loss of habitat. Reduction in pollinators especially bees		5	-3	-15
Soils	Hotter summers, increased	Drier, sandy soils – the top		5	-4	-20

	likelihood of extreme heat	surface will blow away				
	Hotter summers, increased likelihood of extreme heat	Less absorption of rainfall will be likely on clay leading to flooding		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Waterlogging.		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Inability to get farm equipment into fields		5	-3	-15
	Milder wetter winters, increase in rainfall intensity and frequency	Potential rotting of seeds before germination		5	-4	-20
	Jetstream driven longer winters and milder wetter summers.	Inability to get farm equipment into fields		4	-3	-12
	Jetstream driven longer winters and milder wetter summers.	Potential rotting of seeds before germination		4	-4	-16
	Less snowfall, frost and ice	Freeze-thaw process compromised		5	-3	-15
	Increase in the risk of wildfires	n/a		4	0	0
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Topsoil washing away, depending on crop		5	-4	-20

	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and disease pressures	Pests and diseases more likely to persist		5	-3	-15
	economic pressure leading to intensification of agriculture	Reduction in soil quality, loss of crop, loss of income		5	-5	-25

Headlines

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

Mitigation actions for Natural Environment

- Resilient and diverse 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

Farming and Forestry						
Area of Impact	**Headline Projection and impact**	**Risks and Opportunities**	**Mitigation**	**Likelihood**	**Impact**	**Risk**
Small Scale agriculture	Drier summers, increased likelihood of drought	Change of viable crops and grass favouring deep rooted species.		5	0	0

	Drier summers, increased likelihood of drought	Pressure on water resources.		5	-3	-15
	Hotter summers, increased likelihood of extreme heat	Decreased yields and crop failure		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Increased growing season for grass and other plants.		5	3	15
	Milder wetter winters, increase in rainfall intensity and frequency	Restricted access to the land for cattle. Change in necessary farming practices		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Loss of soil		5	-4	-20
	Jetstream driven longer winters and milder wetter summers.	Restricted access to the land for cattle. Change in necessary farming practices		4	-4	-16
	Jetstream driven longer winters and milder wetter summers.	Loss of soil		4	-4	-16
	Less snowfall, frost and ice	Reduced opportunity to spread slurry		5	-2	-10
	Increase in the risk of wildfires	Risk to all aspects of farming		4	-4	-16
	Rising sea levels	n/a		5	0	0

	Increase in the intensity and frequency of storms	Flooding and soil erosion		5	-4	-20
	Shift in the growing seasons	Change in the viable crop range.		5	0	0
	Milder winters and changes to pest and disease pressures	Arrival of new pests from the continent. Increased use of pesticides and medicines at greater cost. Veterinary and plant inspection costs increased.		5	-4	-20
	economic pressures leading to intensification of agriculture	Diversification and intensification. Loss of farms		5	-3	-15
	economic pressures leading to intensification of agriculture	Increase of solar panels and energy crops		5	3	15
Traditional orchards	Drier summers, increased likelihood of drought	Fruit drop.		5	-4	-20
	Hotter summers, increased likelihood of extreme heat	Better quality fruit;		5	4	20
	Hotter summers, increased likelihood of extreme heat	Reduction of “uniqueness” of English apples		5	-3	-15
	Milder wetter winters, increase in rainfall intensity and frequency	Loss of chilling period. Increase of root diseases.		5	-3	-15

	Jetstream driven longer winters and milder wetter summers.	Loss of chilling period. Increase of root diseases. Difficulty harvesting.		4	-3	-12
	Less snowfall, frost and ice	Better fruit set.		5	4	20
	Increase in the risk of wildfires	Loss of ancient orchards		4	-4	-12
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	More fungal diseases, increased risk from hail damage		5	-4	-20
	Shift in the growing seasons	New varieties, e.g. peaches and nectarines become viable. Interruption of dormant season.		5	3	15
	Milder winters and changes to pest and disease pressures	Arrival of new pests from the continent. Increased use of pesticides, plant inspection costs increased.		5	-4	-20
Devon banks	Drier summers, increased likelihood of drought	Change in vegetation profile		5	-2	-10
	Hotter summers, increased likelihood of extreme heat	Change in vegetation profile		5	-2	-10
	Milder wetter winters, increase in rainfall intensity and frequency	Risk of collapse		5	-3	-15

	Jetstream driven longer winters and milder wetter summers.	Risk of collapse		4	-3	-12
	Less snowfall, frost and ice	n/a		5	0	0
	Increase in the risk of wildfires	Destruction of banks		4	-1	-4
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Risk of collapse		5	-3	-15
	Shift in the growing seasons	Not predictable		5	0	0
	Milder winters and changes to pest and disease pressures	n/a		5	0	0
	economic pressures leading to intensification of agriculture	Damage due to larger farm equipment		5	-3	-15
Ancient Hedges	Drier summers, increased likelihood of drought	Change in species profile, gapping		5	-3	-15
	Hotter summers, increased likelihood of extreme heat	Change or reduction in supported biodiversity.		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Change in growing season. More fungal diseases		5	-2	-10

	Jetstream driven longer winters and milder wetter summers.	Change in growing season. More fungal diseases		4	-4	-16
	Less snowfall, frost and ice	Not predictable		5	0	0
	Increase in the risk of wildfires	Loss of ancient hedges		4	-4	-16
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Soil erosion, trees falling		5	-3	-15
	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and disease pressures	Risk to key species, e.g. ash dieback, processionary moth etc		5	-4	-20
	economic pressures leading to intensification of agriculture	Removal of some hedges		5	-3	-15

Headlines

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 actions Farming & Forestry

- Halo thinning and management of browsing around veteran trees will help make them more resilient.

The Built Environment, Community and Economy						
Area of Impact	**Headline Projection and impact**	**Risks and Opportunities**	**Mitigation**	**Likelihood**	**Impact**	**Risk**
Listed buildings	Drier summers, increased likelihood of drought	subsidence		5	-2	-10
	Hotter summers, increased likelihood of extreme heat	Stability of cob construction		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Reduction in heating required.		5	3	15
	Milder wetter winters, increase in rainfall intensity and frequency	Flooding		5	-4	-20
	Jetstream driven longer winters and milder wetter summers.	Flooding		4	-4	-16
	Jetstream driven longer winters and milder wetter summers.	Increase in heating required		4	-3	-12
	Less snowfall, frost and ice	Reduction in heating required.		3	3	9
	Increase in the risk of wildfires	Risk to thatch		5	-3	-15
	Rising sea levels	Increased risk of flooding		5	-3	-15
	Increase in the intensity and frequency of storms	Flooding, risk of lightning to thatch		5	0	0

	Shift in the growing seasons	n/a		5	-3	-15
	Milder winters and changes to pest and disease pressures	Increased risk from mould. Damaging species e.g. termites		5	0	0
	economic pressure leading to intensification of agriculture	n/a		5	-3	-15
Disused farm buildings	Drier summers, increased likelihood of drought	Subsidence		5	-2	-10
	Hotter summers, increased likelihood of extreme heat	Stability of cob construction		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Flooding		5	0	0
	Jetstream driven longer winters and milder wetter summers.	Flooding		4	-4	-20
	Less snowfall, frost and ice	n/a		3	-3	-9
	Increase in the risk of wildfires	Risk to thatch and wooden construction		5	0	0
	Rising sea levels	n/a		5	-3	-15
	Increase in the intensity and frequency of storms	Flooding, risk of lightning to thatch		5	0	0
	Shift in the growing seasons	n/a		5	-3	-15

	Milder winters and changes to pest and disease pressures	Increased risk from mould and damaging species to timber structures.		5	-3	-15
	economic pressure leading to intensification of agriculture	Replacement of traditional farm buildings with modern replacements. Conversion of disused building to dwellings. (class Q)		5	-2	-10
Small villages and hamlets	Drier summers, increased likelihood of drought	Subsidence;		5	-4	-20
	Drier summers, increased likelihood of drought	Reduced water table; pressure on aquifers		5	-2	-10
	Hotter summers, increased likelihood of extreme heat	Hosepipe bans, reduced garden diversity		5	-3	-15
	Hotter summers, increased likelihood of extreme heat	Increased tourism				
	Hotter summers, increased likelihood of extreme heat	Increased housebuilding and infrastructure as a result of migration		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Flooding		5	-4	-20
	Jetstream driven longer	Flooding		4	-4	-16

	winters and milder wetter summers.					
	Less snowfall, frost and ice	Reduced risk of parishes being cut off by snow and ice. Reduced risk of injury to people		3	-4	-12
	Increase in the risk of wildfires	Risk of injury and loss of dwellings		5	0	0
	Rising sea levels	n/a		5	-4	-20
	Increase in the intensity and frequency of storms	flooding		5	0	0
	Shift in the growing seasons	n/a		5	-3	-15
	Milder winters and changes to pest and disease pressures	Risk to gardens and garden biodiversity		5	-2	-10
	economic pressure leading to intensification of agriculture	Reduced water table; pressure on aquifers; increased insurance premiums; higher house prices,		5	-4	-20
Critical Infrastructure	Drier summers, increased likelihood of drought	Loss of drinking water		5	-5	-25
	Hotter summers, increased likelihood of extreme heat	Insufficient shading / cooling in urban environments		5	-4	-20
	Hotter summers, increased	Increased drain on medical resources		5	-4	-20

	likelihood of extreme heat					
	Milder wetter winters, increase in rainfall intensity and frequency	Increased drain on medical resources		5	-4	-20
	Milder wetter winters, increase in rainfall intensity and frequency	Increased pressure on sewerage		5	-4	-20
	Jetstream driven longer winters and milder wetter summers.	Increased drain on medical resources		4	-4	-16
	Jetstream driven longer winters and milder wetter summers.	Increased pressure on sewerage		4	-4	-16
	Less snowfall, frost and ice	Less risk of broken bones due to falls		5	3	15
	Increase in the risk of wildfires	Loss of critical buildings e.g. hospitals, surgeries		5	-3	-15
	Rising sea levels	n/a		5	0	-
	Increase in the intensity and frequency of storms	Strain on blue light responders		5	-3	-15
	Increase in the intensity and frequency of storms	Increased insurance premiums		5	-3	-15
	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and disease pressures	Increased drain on medical resources		5	-4	-20

	economic pressure leading to intensification of agriculture	n/a		5	0	0
Low population density	Drier summers, increased likelihood of drought	As people move to the countryside population density may increase. Pressure on infrastructure		5	-2	-10
	Hotter summers, increased likelihood of extreme heat	As people move to the countryside population density may increase. Pressure on infrastructure		5	-2	-10
	Milder wetter winters, increase in rainfall intensity and frequency	n/a		5	0	0
	Jetstream driven longer winters and milder wetter summers.	n/a		4	0	0
	Less snowfall, frost and ice	n/a		5	0	0
	Increase in the risk of wildfires	n/a		3	0	0
	Rising sea levels	n/a		5	0	0
	Increase in the intensity and frequency of storms	Some villages prone to flooding may become unsustainable		5	-3	-15
	Shift in the growing seasons	n/a		5	0	0
	Milder winters and changes to pest and	n/a		5	0	0

	disease pressures					
	economic pressure leading to intensification of agriculture	Increase in density, loss of character.		5	-2	-10

Headlines

Increased flooding and pressure on infrastructure, especially medical. Pressure on sewerage and loss of drinking water

Mitigation actions for Built environment, community & economy

- 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 more tree planting to field boundaries as well as single trees in fields gives protection to livestock and wildlife alike.

Part B: Greenhouse gas emissions

UK Protected Landscapes greenhouse gas emissions statistics: 2005-2022

Greenhouse gas emissions data for the Blackdown Hills National Landscape

Data supplied by Department for Energy Security and Net Zero, 2024. Data reported in kilotonnes of carbon dioxide equivalent (kt CO2e)

Calendar Year	Industry Total	Commercial Total	Public Sector Total	Domestic Total	Transport Total	LULUCF Net Emissions	Agriculture Total	Waste Total	Grand Total	Population ('000s, mid-yr	Per Capita Emissions	Emissions per km² (kt CO_2e)
2005	**5.2**	**7.3**	**0.9**	**41.0**	**57.3**	**-46.3**	**199.8**	**11.2**	**276.4**	12.7	**21.7**	**0.7**
2006	**5.0**	**7.8**	**0.9**	**42.7**	**55.9**	**-47.2**	**195.3**	**10.5**	**271.0**	12.8	**21.1**	**0.7**
2007	**5.0**	**7.5**	**0.9**	**40.3**	**54.8**	**-47.9**	**194.5**	**9.7**	**264.8**	12.9	**20.5**	**0.7**
2008	**4.6**	**7.4**	**0.9**	**40.5**	**56.0**	**-49.1**	**192.2**	**9.3**	**261.8**	13.0	**20.1**	**0.7**
2009	**4.1**	**6.5**	**0.8**	**38.1**	**53.8**	**-49.3**	**192.8**	**9.2**	**256.0**	13.1	**19.5**	**0.7**
2010	**4.3**	**6.8**	**0.8**	**41.4**	**53.3**	**-49.5**	**194.3**	**7.3**	**258.6**	13.2	**19.5**	**0.7**
2011	**3.9**	**6.1**	**0.7**	**35.7**	**51.7**	**-49.9**	**187.8**	**7.0**	**243.0**	13.4	**18.2**	**0.7**
2012	**4.1**	**6.6**	**0.8**	**37.1**	**51.0**	**-48.6**	**193.3**	**6.7**	**250.9**	13.4	**18.7**	**0.7**
2013	**3.8**	**6.2**	**0.7**	**35.8**	**51.8**	**-50.2**	**186.4**	**5.7**	**240.1**	13.5	**17.8**	**0.6**
2014	**3.6**	**5.3**	**0.6**	**30.5**	**53.3**	**-49.8**	**192.0**	**5.0**	**240.5**	13.6	**17.7**	**0.7**
2015	**3.3**	**4.6**	**0.5**	**28.1**	**57.7**	**-50.4**	**195.6**	**5.1**	**244.5**	13.7	**17.9**	**0.7**
2016	**3.0**	**3.7**	**0.5**	**25.6**	**61.2**	**-48.7**	**190.1**	**5.3**	**240.7**	13.9	**17.4**	**0.7**
2017	**3.0**	**2.5**	**0.4**	**23.7**	**61.1**	**-50.1**	**192.0**	**6.1**	**238.8**	13.9	**17.1**	**0.6**
2018	**3.0**	**2.6**	**0.3**	**23.4**	**61.1**	**-49.7**	**185.3**	**5.8**	**231.7**	14.0	**16.5**	**0.6**
2019	**3.4**	**2.7**	**0.4**	**22.0**	**61.9**	**-49.9**	**185.6**	**6.7**	**232.8**	14.1	**16.5**	**0.6**
2020	**3.3**	**2.5**	**0.3**	**21.5**	**50.3**	**-50.6**	**181.9**	**5.7**	**214.9**	14.1	**15.2**	**0.6**
2021	**3.7**	**2.8**	**0.3**	**21.9**	**57.9**	**-49.6**	**185.8**	**3.0**	**225.9**	14.1	**16.0**	**0.6**
2022	**3.0**	**2.7**	**0.3**	**19.7**	**58.3**	**-49.5**	**166.6**	**3.9**	**204.8**	14.2	**14.4**	**0.6**

Part C: Carbon audit soil organic carbon

In 2022, the National Association of AONBs 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.]*

Before the AONB-specific datasets could be used for comparison with NATMAP Carbon, it was necessary to ensure that the data referred to the soil organic carbon contents for a soil depth of 0-30cm, which is one of the depths data in NATMAP Carbon are reported at. Brief descriptions of the sampled data are available in Table 4.2.1. Samples obtained from the Blackdown Hills AONB covered the soil depths of 0 – 15 and 15 – 30 cm and an average value of organic carbon reported at these depths was calculated for comparison to the 0 – 30 cm depth in the NATMAP Carbon dataset. This was only possible for 59 out of 74 samples which had data for both depths. Observations that reported organic carbon for the 0 – 15 cm depth only were discarded.

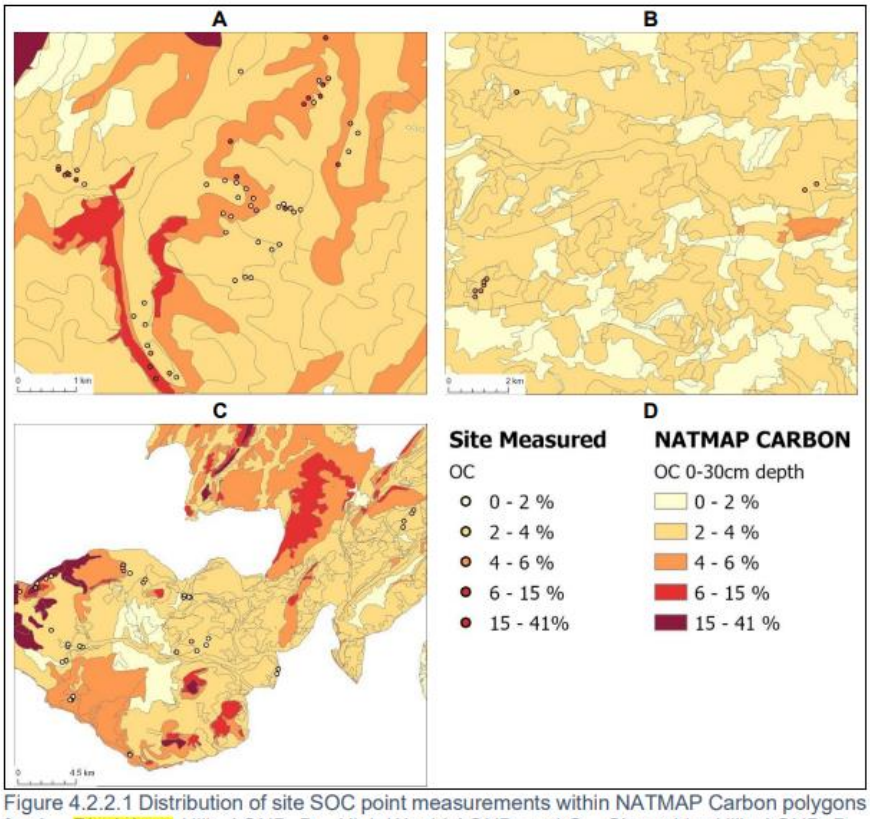


Figure 4.2.2.1 Distribution of site SOC point measurements within NATMAP Carbon polygons for A – Blackdown Hills AONB, B – High Weald AONB, and C – Shropshire Hills AONB, D – legend to the maps.

In the Blackdown Hills AONB (Figure 4.3.1.1) the direct comparisons were the strongest (R2 = 0.23) for the maximum SOC values in NATMAP, which was likely determined by the fact that samples within that AONB were taken from various semi-natural habitats, which likely store more carbon is soils. After aggregation of the site measurements to NATMAP polygons, this relationship increased to 0.98, **indicating near-perfect agreement**. The indirect comparison resulted in fairly good fit of the site measurements to the average value of SOC assigned to the NATMAP polygons, with R2 of 0.89. In the case of this AONB the relationships with the minimum SOC values reported by NATMAP was the weakest, which could be explained by the overall high SOC contents of the sampled soils

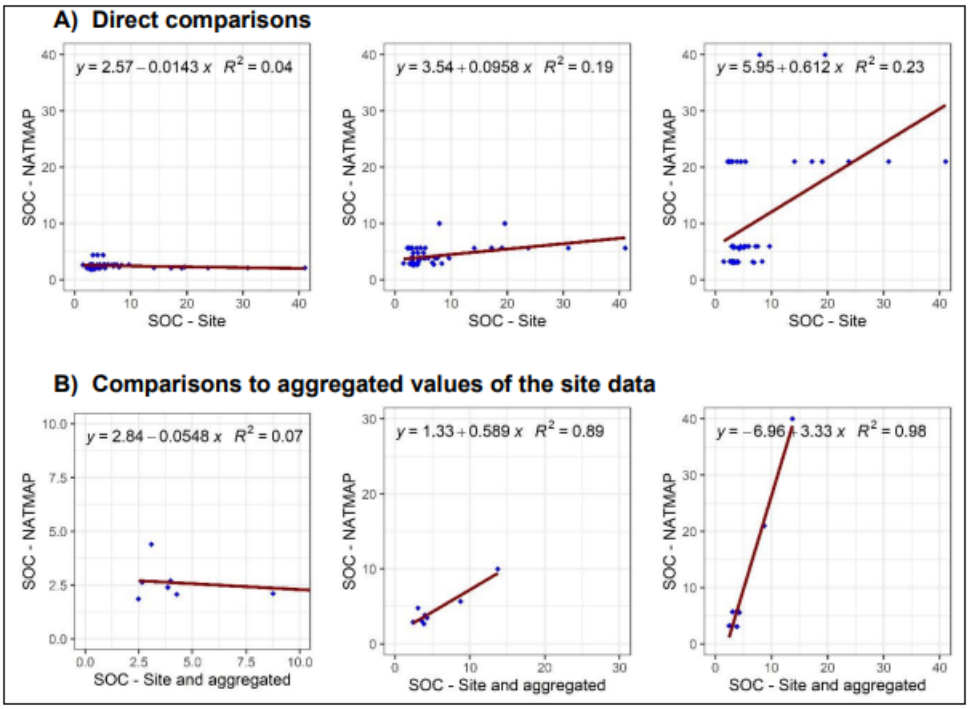


Figure 4.3.1.1 Results of the regression analysis for the Blackdown Hills AONB. The x-axis shows the SOC values measured on site and the y-axis, SOC values derived from NATMAP Carbon: left – minimum SOC, middle – average SOC, right – maximum SOC in each polygon.

The aim of the comparisons carried out between minimum, mean and maximum SOC values reported by the NATMAP Carbon database at national scales to SOC data sampled on sites within selected AONBs was to evaluate whether soil carbon stock assessments based on the NATMAP dataset could reliably represent soil carbon within the AONBs. The results of these comparisons indicate that NATMAP does not represent local, i.e., within-field, variations in SOC very well, however, it can reliably represent soil carbon at wider scales such as related neighbourhoods or landscapes. Results obtained here confirmed findings of a previous study indicating that NATMAP Carbon can represent soil carbon well for areas with relatively low SOC stocks at field rather than sub-field scales (Beka et al., 2022). The results of the comparisons presented here should be treated as indicative, given that the site samples were collected for other purposes than the evaluation of the capacity of NATMAP to accurately represent soil carbon at local scales. Some other sensitivities affecting the strength of the relationship include different laboratory methods to extract soil carbon from samples or different sampling dates – NATMAP is based on legacy soil observations collected by the Soil Survey for England in Wales, spanning across 1939 to 1987, with possible changes in soil carbon contents over time due to past changes in land use and management (Kirk and Bellamy, 2010).

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 Beauty

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

Project objectives:

- To identify which soil types are most valuable for their *existing* carbon stores
- To identify which soil types have the greatest potential to sequester *more* carbon via land management change
- To develop this information into the basis for practical guidance for land managers in the AONB

Soil Carbon:

UK soils store over 10 billion tonnes of carbon, roughly equal to 80 years of annual UK greenhouse gas emissions

Soil carbon sequestration = CO2 being removed from the atmosphere and stored in the soil in the form of soil organic carbon

Soil organic carbon drives the mechanisms of infiltration and retention of air, water and nutrients in the soil which provide multiple benefits to farmers and society

Net Zero:

The UK Government has committed to reaching net zero greenhouse gas emissions by 2050.

Sectors such as industry, agriculture and aviation will be difficult to decarbonise completely by 2050.

Greenhouse gas removal (GGR), such as through soil carbon sequestration, is therefore essential to compensate for the residual emissions

Agriculture, Net Zero and Soils:

Estimates suggest that UK agricultural land could sequester 1-2 tonnes of CO2e per hectare per year

The move towards ‘blended’ finance for agric support – mixing Government support with private finance –means land managers will soon be encouraged to store more carbon on their land, and realise a market value for that carbon by selling carbon credits

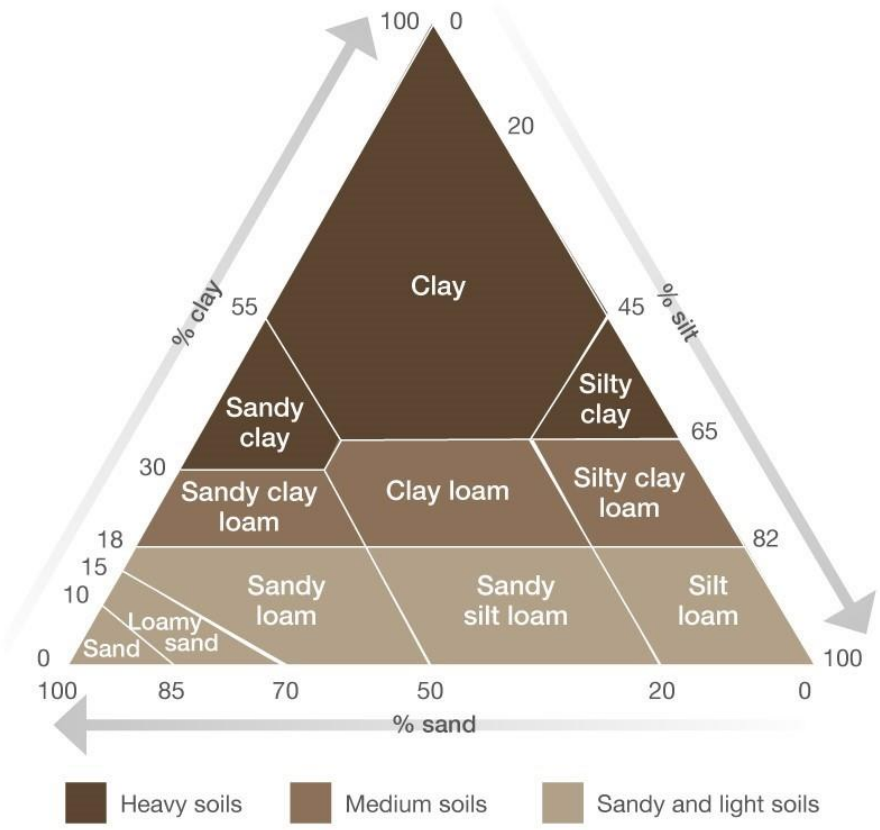
A ‘carbon market’ is rapidly evolving, but we lack an understanding of current soil carbon stores and metrics for measuring it, both at a landscape and single farm scale.

Soil type and carbon storage:

This project focuses on the carbon in the soil, rather than in the vegetation

Soils vary across the landscape, and each soil type has a different inherent capacity to store carbon. That capacity remains the same, though land use and vegetation may vary

If a soil type has a high inherent carbon-storing potential, then carbon sequestration efforts directed towards that soil type will yield the best results



Headlines:

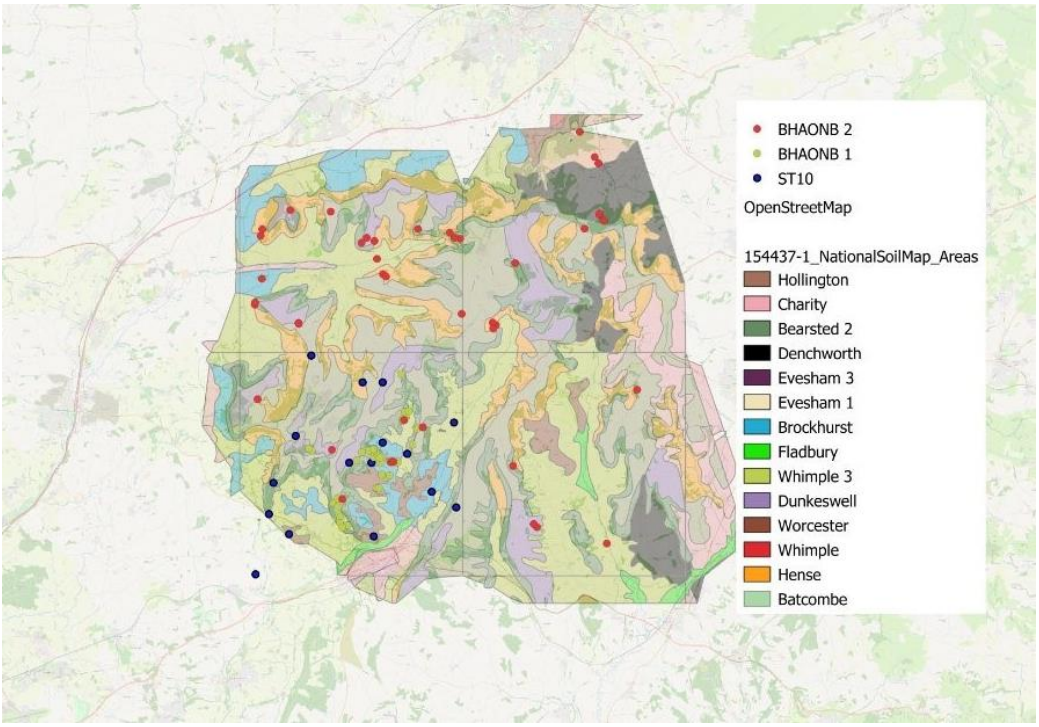
Different soil types vary greatly in their carbon stores, and their potential to hold more carbon.

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.

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 'Whimple' 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

Soil map unit	Area (ha) in BHAONB	Tonnes Soil Organic Carbon per ha	Total S.O.C. (tonnes) in BHAONB
Batcombe	**8,690**	**11.60**	**100,838**
Bearstead	4,786	11.25	53,847
Blackdown	2,000	32.36	64,720
Brockhurst	5,561	16.33	90,801
Charity	3,035	9.70	29,450
Denchworth	4,729	17.16	81,130
Dunkeswell	3,318	14.79	49,069
Evesham	2,553	18.68	47,701
Fladbury	915	32.29	29,548
Hallsworth	302	18.03	5,455
Hense	5,607	44.87	251,608
Hollington	1,236	17.66	21,844

Soil Map Unit	Profile image	Horizon	SOC%	Fine earth	Bulk Density	Thickness (dm)	gC / dm^3	Total Carbon in Profile (gC / dm3)
Batcombe Series		A	4.2	0.95	0.99	2	7.9002	
		E	2.1	0.9	1.18	2.5	5.5755	**13.92**
(Arable/Short term ley)		Bt(g)	0.8	0.9	1.24	0.5	0.4464	
Batcombe Series		A	2.5	0.8	1.17	2	4.68	
		E	1.9	0.75	1.21	2	3.4485	**9.01**
(Unimproved Permanent Grass)		Bt(g)	1.4	0.5	1.26	1	0.882	
Batcombe Series		O	24.2	1		0.2	0	
		A	10.2	0.95	0.81	2.2	17.2676	**26.48**
(Woodland)		Bt(g)	1.5	0.92	1.36	3.8	7.13184	

Appendix 4

INDICATORS AND DATA - PROTECTED LANDSCAPES TARGETS AND OUTCOMES FRAMEWORK (PLTOF)

The Protected Landscapes Targets and Outcomes Framework (PLTOF) defines the contribution that all Protected Landscapes (as areas) should make to national targets and Environmental Improvement Plan (EIP) outcomes/goals.

The PLTOF contains 10 targets. Each target is accompanied by an indicator.

The indicator will measure progress towards each target and its related outcome, which are set out in ***Part 1*** of this document.

The indicator is supported by statistics generated from nationally available data. Natural England has collated national statistics from a range of data providers (where available) to establish the baseline for the Framework's indicators. Data owners include Natural England, Defra, the Forestry Commission and Historic England.

Natural England has also identified and collated a wider set of additional statistics relevant to the statutory purposes of Protected Landscapes, listed in ***Part 2*** of this document.

Statistics for the Blackdown Hills National Landscape are listed in ***Part 3*** of this document, organised under the four management plan themes of place, people, nature and climate.

This new 2024 data release should largely be considered as a new baseline, utilising a consistent national methodology. Defra have indicated that they will review the Framework at least every five years, linked to refreshes of the EIP. Defra will adjust the targets, indicators and supporting statistics in the interim (as needed) to ensure they remain relevant and functional. Natural England will support this process and will collate and provide annual updates of statistics (where available) each April to the Protected Landscapes Partnership, Defra and Protected Landscape bodies. A full set of statistics are due to be reissued in April 2025, which will address and update any anomalies or interim status of the 2024 data used in this management plan.

Part 1: Outcomes, Targets and Target Indicators

Environmental Improvement Plan 2023 outcome – Goal 1: Thriving plants and wildlife

PLTOF 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 Indicator 1 (TI_1):

Extent of wildlife rich habitat created or restored within Protected Landscapes, outside of protected sites

Provider: Natural England
Release date: April 2025 (tbc)
Licensing: tbc
Reporting cycle: Annual
Notes: Indicator is in development.

PLTOF Target 2

Bring 80% of SSSIs within Protected Landscapes into favourable condition by 2042.

Target Indicator 2 (TI_2):

Percentage of SSSIs within Protected Landscapes in favourable condition.

Provider: Natural England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

PLTOF Target 3

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

Target Indicator 3 (TI_3):

Percentage of SSSIs within Protected Landscapes assessed as having ‘actions on track’ to achieve favourable condition.

Provider: Natural England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

PLTOF 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.

Target Indicator 4 (TI_4):

Extent of priority habitat within Protected Landscapes, outside of protected sites, in favourable management through agri-environment schemes.

Provider: Defra
Release date: April 2025
Licensing: tbc
Reporting cycle: Annual
Notes: Indicator is in development.

PLTOF 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 Indicator 5 (TI_5):

Percentage of land managers adopting nature-friendly farming on a percentage of their land.

Provider: Defra
Release date: April 2025
Licensing: tbc
Reporting cycle:
Notes: Annual Indicator is in development.

Environmental Improvement Plan 2023 outcome – Goal 7: Mitigating and adapting to climate change

PLTOF Target 6

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

Target Indicator 6 (TI_6):

Level of greenhouse gas emissions within Protected Landscapes.

Provider: Department for Energy Security and Net Zero (DESNZ)
Release date: June 2024
Licensing: tbc
Reporting cycle: Annual

Notes: See: 2005-22-uk-protected-landscapes-ghg-emissions.xlsx

PLTOF Target 7

Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050.

Target Indicator 7 (TI_7):

Extent of peat under restoration in Protected Landscapes. *(This dataset describes the Nature for Climate Peatland Grant Scheme (NCPGS) funded peatland restoration sites in England that occur in Protected Landscapes.)*

Provider: Natural England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

PLTOF Target 8

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

Target Indicator 8 (TI_8):

Extent of tree canopy and woodland cover in Protected Landscapes.

Provider: Forestry Commission
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Notes:
Indicator is in development. Interim statistics provided for woodland cover. Statistics on extent of tree canopy to be released when available

Environmental Improvement Plan 2023 outcome – Goal 10: Enhancing beauty, heritage and engagement with the natural environment

PLTOF Target 9

Improve and promote accessibility to and engagement with Protected Landscapes for all using existing metrics in our Access for All programme.

Target Indicator 9 (TI_9):

Improve and promote accessibility to and engagement with Protected Landscapes for all using existing metrics in our Access for All programme:

TI_9a: Metres of accessible path as a % of total path.

TI_9b: Number of accessible toilets and rest stops.

TI_9c: Number of disability accessible parking spaces.

TI_9d: Number of accessible gates and gaps.

TI_9e: Number of visits and volunteer days facilitated by new equipment.

TI_9f: Number of schools engaged (primary and secondary) both inside and outside the Protected Landscape boundary.

TI_9g: Number of volunteer days.

TI_9h: Number of accessible or easy access routes for which wayfinding has been created or improved.

TI_9i: Policies in place to ensure Protected Landscapes are taking positive action to widen the diversity of their staff, boards and volunteers.

Provider: Protected Landscape bodies
Release date: tbc

Licensing: tbc
Reporting cycle: Annual

Notes:
Defra has requested this information from Protected Landscapes bodies, as part of the annual Farming in Protected Landscapes and ‘Access for All’ monitoring survey/ commission.

PLTOF Target 10

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

Target Indicator 10 (TI_10):

Number and percentage of nationally designated heritage assets in Protected Landscapes to be deemed at risk.

Provider: Historic England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Notes:
Covers the categories of scheduled monuments, registered parks and gardens, registered battlefields, listed buildings (grade I or II*) and protected wreck sites.

Part 2: Additional baseline statistics made available to Protected Landscapes in 2024

Statistic 1

Extent of priority habitat and other habitats within Protected Landscapes.

Provider: Natural England
Release date: April 2024 (interim measure)
Licensing: Open Government Licence
Reporting cycle: Annual

Notes:

Statistics on ‘other habitats’ available in April 2025, based on updated Living England data.

Statistic 2

Area of land within Protected Landscapes designated at international, national and local level for nature conservation.

Provider: Natural England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Statistic 3

Area of woodland within Protected Landscapes under sustainable management.

Provider: Forestry Commission
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Statistic 4

Extent of ancient woodland within Protected Landscapes.

Provider: Natural England
Release date: April 2024
Licensing: Open Government Licence

Reporting cycle: Annual

Statistic 5

Ecological status of watercourses and water bodies within Protected Landscapes.

Provider: Environment Agency
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Every three years

Statistic 6

Area, depth and percentage cover of peatland within Protected Landscapes.

Provider: Natural England
Release date: April 2024 (interim measure), updated July 2024
Licensing: Non-Commercial Government Licence
Reporting cycle: See notes

Notes: Links to spatial data added plus note on 'grand total % values'. Updated evidence on peat extent/depth/ condition due April '25 (based on the England Peat Map which is due to be published at the end of March '25).

Statistic 7

Estimate of the amount of carbon stored and sequestered by habitats within Protected Landscapes.

Provider: Natural England
Release date: due June 2024
Licensing: Aiming to release under Open Government Licence
Reporting cycle: Every five years

Notes: Statistics due 2024.

Statistic 8

Length of National Trails within Protected Landscapes.

Provider: Natural England
Release date: April 2024

Licensing: Open Government Licence
Reporting cycle: Annual

Statistic 9

Number of nationally designated heritage assets in Protected Landscapes.

Provider: Historic England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Statistic 10

National Character Areas which contain Protected Landscape(s), where changes to landscape and waterscape character is assessed as improving/no change/declining.

Provider: Natural England
Release date: April 2025
Licensing: tbc
Reporting cycle: Every five years

Statistic 11

Length of hedgerows and other traditional field boundaries (drystone walls) within Protected Landscapes.

Provider: Defra
Release date: April 2024 (interim measure). Reissued May '24.
Licensing: Open Government Licence
Reporting cycle: Annual

Notes: Initial figures are for hedgerow length. Reissued to correct formatting error.

Statistic 12

Total area of land managed under agri-environment schemes and total value of schemes within Protected Landscapes.

Provider: Defra
Release date: April 2024, reissued July '24

Licensing: Open Government Licence
Reporting cycle: Annual

Notes: Reissue only includes area of schemes currently.

Statistic 13

Area of land under different agricultural land uses within Protected Landscapes and number of livestock.

Provider: Defra
Release date: Already released
Licensing: Published on-line
Reporting cycle: Publication of next updates: Spring 2025, spring 2028 (tbc) and 2031.

Notes:

See Structure of the agricultural industry in England and the UK at June - GOV.UK

Statistic 14

Area and distribution of main landcover types within Protected landscapes.

Provider: Natural England
Release date: April 2025
Licensing: Open Government Licence
Reporting cycle: tbc

Notes: Derived from Living England data.

Statistic 15

Number of geological and geomorphological SSSI unit features and percentage in favourable or recovering condition.

Provider: Natural England
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Statistic 16

Extent of agricultural businesses within Protected Landscapes (number and size of holdings, number of agricultural workers).

Provider: Defra
Release date: Already released
Licensing: Published on-line
Reporting cycle: Publication of next updates: Spring 2025, spring 2028 (tbc) and 2031.

Notes: See Structure of the agricultural industry in England and the UK at June - GOV.UK.

Statistic 17

Population estimates for Protected Landscapes.

Provider: Defra
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Every 10 years

Notes: These are refined population estimates, following the draft estimates provided by the Office for National Statistics in 2023.

Statistic 18

Average age of the population living in Protected Landscapes.

Provider: Defra
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Every 10 years

Statistic 19

Proportion of the population within each ethnic group in Protected Landscapes.

Provider: Defra
Release date: April 2024

Licensing: Open Government Licence
Reporting cycle: Every 10 years

Statistic 20

Median earnings in Protected Landscapes.

Provider: Defra
Release date: April 2024, reissued July 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Notes: Reissued to correct estimates for a small number of Protected Landscapes.

Statistic 21

House price affordability ratios in Protected Landscapes.

Provider: Defra
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: tbc. Depends on availability of refined data on estimated incomes.

Statistic 22

Registered businesses by size and type in Protected Landscapes.

Provider: Defra
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Statistic 23

Proportion of the population living in each decile of deprivation in Protected Landscapes.

Provider: Defra
Release date: April 2024
Licensing: Open Government Licence
Reporting cycle: No regular reporting cycle; potential update 2026 (tbc)

Statistic 24

Number of pupils on the school roll (against total capacity) in Protected Landscapes.

Provider: Defra
Release date: April 2024, reissued July 2024
Licensing: Open Government Licence
Reporting cycle: Annual

Notes: Reissued to correct how source data is apportioned to Protected Landscapes.

Part 3: Protected Landscapes Targets and Outcomes Framework datasets for Blackdown Hills National Landscape

All April 2024 (unless stated otherwise).

Place

Statistic 3

Area of woodland within the protected landscape under sustainable management:

Managed private: 1445.1 hectares

Managed public: 1023.2 hectares

Unmanaged: 2945.1 hectares

Total: 5413.3 hectares

Statistic 4

Extent of ancient woodland within the protected landscape:

Ancient and semi-natural woodlands (ASNW): 426.7 hectares (1.2% of protected landscape)

Plantations on Ancient Woodland Sites (PAWS): 440.5 hectares (1.2% of protected landscape)

Grand total: 867.2 hectares (2.3% of protected landscape)

Location and extent of ancient semi-natural woodland (ASNW):

Ashcombe Copse: 7.45 hectares
Bickham Wood: 16.47 hectares
Blackborough Wood: 4.42 hectares
Buckeshayes Wood: 0.75 hectares
Buckhayes Covert: 4.64 hectares
Butsons Copse: 4.25 hectares
Bywood Copse: 20.96 hectares
Cod Wood: 2.99 hectares
Combe Wood: 7.25 hectares
Cotley Copse: 5.25 hectares
Court Wood: 7.99 hectares
Coxs Wood: 15.05 hectares
Crown All Wood: 4.44 hectares
Cummins Copse: 4.23 hectares
Farm/Buckland Woods: 27.64 hectares
Fourteen Acre Copse: 5.69 hectares
Great Copse: 7.23 hectares
Greyborough Copses: 3.16 hectares
Hayne Wood: 3.52 hectares
Hayne Wood West: 0.58 hectares
Hey Wood: 0.97 hectares
Higher Ash/Long Woods: 23.64 hectares
Knapp Copse: 0.40 hectares
Knowles Wood: 0.80 hectares
Luxhay Wood: 18.29 hectares
Middleroom/Castle Woods: 20.53 hectares
Murlinch/Adcombe Woods: 90.15 hectares
Parsonage Wood: 2.48 hectares
Pen Point Wood: 15.32 hectares
Rectory Wood: 3.22 hectares
Sadbeer Wood: 3.74 hectares
Shapcombe Copses: 4.32 hectares
Summerhayes Wood: 3.70 hectares
The Chase: 10.61 hectares
Trotts Wood: 5.13 hectares
Wellands Coppices: 4.86 hectares
Wellsprings Wood: 3.14 hectares
Wood Copse: 5.06 hectares
Wood Moor Copse: 4.09 hectares
Yarty Copse: 4.05 hectares
Young/Piddle Woods: 28.77 hectares

Statistic 5

Water Framework Directive status – ecological status of watercourses and water bodies within the Protected Landscape:

This includes rivers, canals and surface-water transfers.

Number of waterbody catchments within each status

High: 0
Good: 0
Moderate: 19
Poor: 9
Bad: 2
Not assessed: 0

Length of water bodies within each status (km)

High: 0km
Good: 0km
Moderate: 123km
Poor: 24km
Bad: 0.8km
Not assessed: 0km

Number of lakes within each status

High: 0
Good: 0
Moderate: 2
Poor: 0
Bad: 0
Not assessed: 1

Number of groundwater waterbodies within each status

High: 4
Good: 0
Moderate: 0
Poor: 3
Bad: 0

Not assessed: 0

Statistic 9

Number of nationally designated heritage assets in the Blackdown Hills National Landscape:

(December 2023)

Listed buildings

Grade I: 13

Grade II*: 47

Grade II: 710

Total: 770

Scheduled monuments

26

Registered parks and gardens

0

Registered battlefields

0

Protected wreck sites

0

Target Indicator 10

Number and percentage of nationally designated heritage assets in the Blackdown Hills National Landscape deemed to be at risk:

(November 2023)

Listed buildings

Grade I: 0

Grade II*: 1 (2.1%)

Grade II: 0

Total: 1 (0.1%)

Scheduled monuments

3 (11.5%)

Statistic 11

There are 4,400 kms of hedgerows within the Blackdown Hills National Landscape.

Statistic 12

The total area of land in the Blackdown Hills National Landscape managed under agri-environment schemes, i.e. Countryside Stewardship Environmental Stewardship and the Sustainable Farming Incentive, is 6,800 hectares (18% of the protected landscape).

Statistic 15

Number of geological and geomorphological SSSI unit features and percentage in favourable or recovering condition:

Favourable: 1 (33.3%)

Unfavourable - no change: 2 (66.7%)

Total: 3

Wilmington Quarry

Condition: favourable

Classification: disused quarry, pits and cuttings

Interest: Earth heritage, Late Cretaceous

Furley Chalk Pit

Condition: unfavourable – no change

Classification: disused quarry, pits and cuttings

Interest: Earth heritage, Late Cretaceous

Reed's Farm Pit
Condition: unfavourable – no change

Classification: disused quarry, pits and cuttings

Interest: Earth heritage, Late Cretaceous

People

Population data, April 2024 from analysis of 2021 Census. Note that a geographical best fit approach was used to provide these figures, whereas other analysis may have used a population-weighted centroid approach which gives different results.

Statistic 17

Population estimate for Blackdown Hills National Landscape:

16,400.

Statistic 18

Average age of the population living in Blackdown HIlls National Landscape:

48

Statistic 19

Proportion of the population within each ethnic group in Blackdown Hills National Landscape:

Asian, Asian British or Asian Welsh: <1%

Black, Black British, Black Welsh, Caribbean, or African: <1%

Mixed / Multiple ethnic groups: 1%

White: 98%

Other ethnic groups: <1%

Based on allocation of Output Areas, Census 2021.

Source: Defra analysis; Ethnic group - Office for National Statistics.

Statistic 20

Median earnings in Blackdown Hills National Landscape:

£2,100 (per calendar month).

Based on apportioning of local authorities and rounded to nearest £50.

Source: Defra analysis; Earnings and employment from Pay As You Earn Real Time Information, UK - Office for National Statistics

Statistic 21

House purchase affordability ratios in Blackdown Hills National Landscape:

Affordability ratio: 9

Based on apportioning of middle-layer Super Output Areas. Ratios have been rounded to the nearest whole number. They represent the mean house purchase price to mean gross annual household income, i.e. full-time employees in the area could expect to spend around 9 times their annual earnings buying a home.

Sources: Defra analysis; House price statistics for small areas in England and Wales - Office for National Statistics; Income estimates for small areas - ONS ; Housing affordability in England and Wales - Office for National Statistics.

Statistic 22

Registered businesses by size in Blackdown Hills National Landscape, 2021/22:

10+ employees: 80 (5%)

1-9+ employees: 895 (61%)

0 employees: 490 (33%)

Total number of local units: 1465 (100%)

Source: Defra analysis; Inter-Departmental Business Register (IDBR) - Office for National Statistics.

Local units of registered businesses in Blackdown Hills National Landscape by industry type, 2021/22:

Accommodation & food service activities: 60 (4%)

Administrative & support service activities: 85 (6%)

Agriculture, forestry & fishing: 560 (38%)

Arts, entertainment & recreation: 30 (2%)

Construction: 130 (9%)

Education, health, and social work: 60 (4%)

Finance: 15 (1%)

Information & communication: 40 (3%)

Manufacturing: 70 (5%)

Mining/ quarrying, and utilities: 5 (0%)

Professional, scientific & technical services: 155 (11%)

Public administration and defence; other services: 50 (3%)

Real estate activities: 45 (3%)

Transport & storage: 30 (2%)

Wholesale & retail trade, repair of motor vehicles: 130 (9%)

Total: 1465

Source: Defra analysis; Inter-Departmental Business Register (IDBR) - Office for National Statistics.

Statistic 23

Proportion of the population living in each decile of deprivation in Blackdown Hills National Landscape:

Based on apportioning of Lower-Layer Super Output Areas.

Decile 1: 0%

Decile 2: 0%

Decile 3: 0%

Decile 4: 0%

Decile 5: 33%

Decile 6: 44%

Decile 7: 8%

Decile 8: 15%

Decile 9: 0%

Decile 10: 0%

Average IMD decile (mode): 6

Average IMD decile (median): 6

Source: Defra analysis; English indices of deprivation 2019 - GOV.UK

Nature

Target indicator 2

Percentage of SSSI features within Blackdown Hills National Landscape in favourable condition:

Favourable: 7

Unfavourable – Recovering: 19

Unfavourable - No change: 5

Unfavourable – Declining: 3

Partially destroyed: 0

Not Recorded : 9

Total no. of SSSI features: 43

% SSSI features in favourable condition: 16.3%

Target Indicator 3

Percentage of SSSI features within Blackdown Hills National Landscape assessed as having 'actions on track' to achieve favourable condition:

Negative: 43

Positive: 0

Total: 43

% SSSI features on track: 0%

Note: 'negative' refers to actions which have not been yet undertaken or which are resulting in a negative impact on the SSSI.

Statistic 1

Priority habitat – totals

Priority habitat area: 4,556 ha

Protected Landscape area: 36,959 ha

Priority habitat %: 12%

Priority habitat area – by main habitat type

Not priority habitat: 32,402 ha

Coastal and floodplain grazing marsh: 60 ha

Deciduous woodland: 3,538 ha

Good quality semi improved grassland: 285 ha

Lowland calcareous grassland: 24 ha

Lowland dry acid grassland: 19 ha

Lowland fens: 88 ha

Lowland heathland: 149 ha

Lowland meadows: 142 ha

Ponds: 0

Purple moor grass and rush pastures: 169 ha

Traditional orchard: 82 ha

Statistic 2

Area of land (km2) within Blackdown Hills National Landscape designated at international, national and local level for nature conservation:

Local Nature Reserves (LNR): 21.53 ha (0.1%)

Special Areas of Conservation (SAC): 20.34 ha (0.1%)

Site of Special Scientific Interest (SSSI): 638.85 ha (1.7%)

Climate

Target Indicator 7

Area of peat committed for restoration by March 2025:

0 ha

Note: Only six National Landscapes return a result for this indicator.

Statistic 6

Area, depth and percentage cover of peatland within Blackdown Hills National Landscape:

Extent of types of peat:

Deep peaty soils (>40cm) 0
Shallow peaty soils (10-40cm) 0
Soils with peaty pockets (scattered pockets) 10017.17 ha (27.1%)

Target Indicator 8

Extent of woodland cover; The area (in hectares) of woodland in Blackdown Hills National Landscape, by woodland type from the National Forest Inventory (NFI).

Interim data, with extent of tree canopy cover to be released when available.

Broadleaved: 3,766 ha

Conifer: 772 ha

Felled: 338 ha

Ground Prepared for New Planting: 11 ha

Mixed: 388 ha

Shrub: 16 ha

Young trees: 87 ha

Total: 5,379 ha

Blackdown Hills National Landscape:
Area of Outstanding Natural Beauty Management Plan 2025-2030

Adoption draft

April 2025

PART C: 5 year Strategic Delivery Plan 2025-2030

INTRODUCTION

There is a hierarchy of strategies and plans within which the National Landscape 5 year Delivery Plan sits:

- The 20-year **vision** in the revised 5 year National Landscape Management Plan sets the direction for the work of the National Landscapes Partnership. Flowing from this, **objectives and policies** are defined that *conserve and enhance the natural beauty of the National Landscape*, tackling issues that impact the National Landscape as well as seeking opportunities to enhance it.
- Embedded in the National Landscape Management Plan, this **5 year Delivery Plan** sets high level actions and National Landscape Partnership delivery goals, in order to deliver agreed measurable outcomes.
- Guided by the 5 year Delivery Plan, **annual National Landscape Business Plans** sets out key priorities and actions for the National Landscapes Partnership, that follow a thread all the way down from the vision and via monitoring, it can be demonstrated (see below) that each of the action/s (focusing primarily on the actions associated with Key Priorities) help deliver objectives and policies as set out in the National Landscape Management Plan.
- Monitoring via the Protected Landscape Targets and Outcome Framework (PLTOF) and other indicators, will help in demonstrating impact and can be related back to the government's Environmental Improvement Plan (EIP) and other plans and strategies e.g. Local Nature Recovery Strategies and Climate Action Plans/ Strategies.

National Landscape Management Plan 2025-30

The revised Management Plan 2025-2030 is jointly 'owned' by the component Local Authorities.

The National Landscape Management Plan has 4 themes (Place, People, Nature & Climate), each with Objectives, Principles and Policies per Topic. It provides a vision for the future, identifies the challenges and opportunities for the area, and how these will be tackled.

It aims to:

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

Its audiences include:

- Local authority partners
- Other National Landscape Partnership organisations
- Relevant public and statutory bodies
- Landowners and managers

- Local communities and businesses

This 5 year Blackdown Hills National Landscape Delivery Plan 2025-30
The Management Plan outlines the strategic priorities necessary to achieve the objectives set out under the 4 themes (Place, People, Nature & Climate) and the main programmes, projects and partnerships that will provide the action.

National Landscape Business Plan 2025-26
The annual plans for the National Landscape team and main partners is informed by the 5 year National Landscape Delivery Plan. The National Landscape team leads on some actions, while with others it works in partnership or plays a supportive role, with other National Landscape partners leading.

The actions follow the same 4 Themes of the National Landscape Management Plan. The Objectives (from the Management Plan) and the Partnership Delivery actions (from the Delivery Plan) are listed at the top of each of the Theme headings.

The National Landscapes Business Plan provides the financial figures for the Defra grant, and the support agreed by the local authority funding partners.

Its audience includes: National Landscapes staff team, National Landscapes partners, Funding partners and Other stakeholders

This Delivery Plan is subject to change; first version April 2025.

Key priorities and actions

- The table below highlights the priority work areas of the National Landscape Partnership for the period 2025-2030 (split into the 4 Management Plan themes), within which there will be a mix of core work and externally funded programmes/ component projects
- The priority work areas are designed to be ambitious yet achievable (through direct delivery, support or advocacy mechanisms), however many are reliant on external funding. Many of the activities covered in the detail of the plan are embraced in a number of the key projects/ initiatives.

THEME 1: PLACE
• Continue to support the farming and land management community through agricultural transition, via farm facilitation support programmes and by responding to ever-changing agricultural policy and the need/incentives to provide ecosystem services for society, including green finance • Step up the action needed to tackle Water Environment Regulations (WER) water quality failures, linked to drinking water/ resource (including drought), surface quality and downstream coastal waters. • Undertake significant new tree planting, including orchards, restore undermanaged woodlands (to promote regeneration), and restore/reestablish 'trees outside woods' habitats, seeking an additional 1108.76 hectares of tree canopy and woodland cover by 2050. • Increase the uptake in agri-environment schemes, across all components of Environmental Land Management (ELM), including supporting the Luppitt Landscape Recovery scheme • Desk based appraisal of the historic environment - use the results to identify where the most significant gaps in understanding are and how they can be addressed. The potential opportunities for community heritage and citizen science projects to help fill those gaps will also be identified. • Continue to inform and influence planning policy, decisions and implementation through development of additional planning guidance and other tools and mechanisms, working with local planning authorities. Develop a shared understanding of the potential opportunities and effects of measures such as carbon offsetting, nutrient credits and biodiversity net gain in relation to conserving and enhancing natural beauty.
THEME 2: PEOPLE
• 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 • The Blackdown Hills National Landscape Partnership to take positive action to increase diversity within the management group and the voices reflected in decision making • Promote activities, including organised activities, which support the physical, mental and social health of residents and visitors • Collect data so that we have a clear definition and better understanding of equity, diversity and inclusion issues relevant to the Blackdown Hills. This includes undertaking further work to deepen our knowledge of the population within the Blackdown Hills and the surrounding area and responding accordingly

- Build relationships among local community organisations and agencies to collaborate on inclusion
- Undertake an audit of the current ways in which the qualities of the landscape and historic environment are presented to the local population and the visiting public. Use the results to identify the opportunities for methods and locations for improvement in the presentation of information and explore ways that the local community could be actively involved
- Collaboration among partners to champion and find solutions to practical issues widely affecting communities, such as high speed broadband connectivity and highway maintenance

THEME 3: NATURE

- Restore all priority habitat to a favourable condition, thereby helping to restore the characteristic 'patchwork' landscapes and habitat features for the Blackdown Hills National Landscape, particularly springline mires
- Undertake significant work to move SSSI sites from 'unfavourable recovering' to 'favourable'
- Enhance the data baseline, particularly for areas outside designated sites, including refresh / ground-truthing priority habitat maps to improve their accuracy and coverage
- Ensure that activities for nature are consistent with actions arising from the Local Nature Recovery Strategies in Devon and Somerset
- Focus on habitat creation in the highest priority areas, as per the Lawton hierarchy

THEME 4: CLIMATE

Adaptation:

- Mainstream soil health and regenerative farming and forestry techniques, in order to build resilience of soils, that will in turn help with infiltration of water and storage of carbon
- 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.

Mitigation:

- Produce a comprehensive pathway to net zero by 2026

ACTION PROGRAMME

- The table below shows the actions under each of the four themes (Place, People, Nature and Climate)
- Acronyms are listed in full in the glossary (below the action table)
- 'Targets' listed below are the Protected Landscapes Targets and Outcome Framework (PLTOF) targets

Theme	**Sub-theme**	**Ref**	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[1] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
1: PLACE						
	Target 5[2][3]	1.1	Increase the uptake of appropriate agri-environment scheme (AES) options, aiming for 75%+ uptake of Sustainable Farming Incentive (SFI), to underpin Countryside Stewardship and Landscape Recovery (the three components of Environmental Land Management- ELM)	BHNL (RPA, NE, FC)	Ascertain where the SFI agreements are currently located, where are the gaps in take-up and look to fill these, via land advisory effort that supports farmers and land managers in choosing the most beneficial options Aim to increase take-up from agri-environment schemes from 20% to 27% (2017 level)	

[1] Is not necessarily the National Landscape staff unit

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

Theme	Sub-theme	Ref	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[1] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
	Target 5	1.2	Support and add value to schemes such as the Luppitt Landscape Recovery project (Landscape Recovery round 2) and the potential extension to the Upper Axe Landscape Recovery project (round 1), as well as rolling out successful Landscape Recovery type management to other areas in the Blackdown Hills	BHNL (RPA, NE, FC)	Better understand how to add value and articulate what rolling out Landscape Recovery type management looks like, then implement	
	Target 8[4]	1.3	Undertake significant new tree planting, including orchards, restore undermanaged woodlands (to promote regeneration), and restore/re-establish 'trees outside woods' habitats, seeking an additional 1108.76 hectares of tree canopy and woodland cover by 2050 Provide woodland advisory support for willing landowners (including relevant authorities), while applying the 'right place right tree' principles. The Somerset and Devon Tree Strategies will help guide and support this	BHNL (FC)	Therefore, 39.6 hectares per year between 2022 and 2050. There are 5,380 ha of woodland covering 14.5% of the Blackdown Hills National Landscape Brings the total amount of woodland to 9,302.93 hectares (22,988 acres) • Obtain data to inform progress towards the target e.g. EWCO • Create a shared plan to achieve this target Work with the Somerset and Devon Tree Strategy teams and woodland advisers	

[4] *"Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline)"*

Theme	Sub-theme	Ref	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[1] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
	Target 10[5]	1.4	Decrease the number of nationally designated heritage assets at risk in Protected Landscapes There are 770 Listed Buildings and 26 Scheduled Monuments. Of these, eight assets are at risk; this is a minor improvement since 2019	BHNL (HE, DCC)	Review the reasons why the eight assets are still at risk and produce an Action Plan for removing as many as possible off the list, as quickly as possible	
	Other priorities	1.5	Step up the action needed to tackle Water Framework Directive (WFD) failures (now referred to as the Water Environment Regulations (WER), linked to drinking water quality and supply (including drought), surface quality and downstream coastal waters. This will involve working with land managers, water industry and other delivery partners	BHNL (EA, CSF, East Devon Catchment Partnership)	Support the Culm, Otter and Axe water quality citizen science groups, under the Making Rivers Better banner Focus significant project effort at improving water quality, via Triple Axe, Connecting the Culm and partnerships projects in the Otter catchment and headwaters of the Tone and Parrett	
	Other priorities	1.6	Continue to promote, deliver and advocate for 'mainstreaming' natural-based solutions as a mechanism to provide resilience to property and infrastructure, both within the Blackdown Hills National Landscape but also, importantly, downstream where major critical infrastructure is at risk from flooding and where improving resilience is only possible through upstream interventions	BHNL (All partners)	Nature-based solution interventions rely on land managers to collaborate at scale. The Blackdown Hills National Landscape Partnership will play a key role here, to help support, incentivise and deliver (Connecting the Culm, Triple Axe)	

[5] *"Decrease the number of nationally designated heritage assets at risk in Protected Landscapes"*

Theme	Sub-theme	Ref	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[1] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
	Other priorities	1.7	Continue to support the farming and land management community through agricultural transition, via farm facilitation support programmes and by responding to ever-changing agricultural policy and the need/incentives to provide ecosystem services for society, including green finance opportunities such as nutrient credits and Biodiversity Net Gain	BHNL (NFU, CLBA)	The National Landscape Partnership play a key convening, supporting and delivery role here and lead on the farm facilitation work (Blackdown Hills Sustainable Farming Network)	
		1.8	Desk based appraisal of the historic environment - use the results to identify where the most significant gaps in understanding are and how they can be addressed. The potential opportunities for community heritage and citizen science projects to help fill those gaps will also be identified.	BHNL (DCC, SWHT)	*To be determined.*	
		1.9	Continue to inform and influence planning policy, decisions and implementation through development of additional planning guidance and other tools and mechanisms, working with local planning authorities. Develop a shared understanding of the potential opportunities and effects of measures such as carbon offsetting, nutrient credits and biodiversity net gain in relation to conserving and enhancing natural beauty.	BHNL (LPAs)	*To be determined.*	

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[6] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
2: PEOPLE						
	Target 9[7]	2.1	Capitalise on opportunities to secure physical works to improve accessibility, such as accessible trails, parking and facilities	BHNL (All partners)	Continue and expand (subject to funding) the Linking People and Places (LPAP) programme Utilise FiPL and Defra Access for ALL funding	
	Target 9	2.2	Ensure that projects have opportunities for volunteering and engagement with schools built in	BHNL (All partners)	Build into all current projects including Connecting the Culm and Triple Axe Re-build the volunteering offer Maintain the education programme each year, moving the focus around different themes/ topics and areas	
	Target 9	2.3	The Blackdown Hills National Landscape Partnership to take positive action to increase diversity within the management group and the voices reflected in decision making	BHNL (PMG)	Work hard to diversify the Management Group and make sure that a range of voices are heard and have a role in decision making	
	Target 9	2.4	Promote activities, including organised activities, which support the physical, mental and social health of residents and visitors	BHNL (All partners)	*To be determined.*	

[6] Is not necessarily the National Landscape staff unit

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

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[6] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
	Other priorities	2.5	Collect more data so that we have a clear definition and better understanding of equity, diversity and inclusion issues relevant to the Blackdown Hills	BHNL (All partners)	This includes undertaking further work to deepen our knowledge of the population within the Blackdown Hills and the surrounding area and responding accordingly	
	Other priorities	2.6	Build relationships among local community organisations and agencies to collaborate on inclusion	BHNL (All partners)	Create and pump prime a Nature Connection Network, help address barriers to engagement (e.g. transport) and enable/ support group training on key topics	
	Other priorities	2.7	Undertake an audit of the current ways in which the qualities of the landscape and historic environment are presented to the local population and the visiting public. Use the results to identify the opportunities for methods and locations for improvement in the presentation of information and explore ways that the local community could be actively involved.	BHNL	*To be determined.*	
	Other priorities	2.8	Collaboration among partners to champion and find solutions to practical issues widely affecting communities, such as high speed broadband connectivity and highway maintenance	BHNL (PC, BHPN, LA)	*To be determined.*	

Theme	Sub-theme	Ref	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[8] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
3: NATURE						
	Target 4[9]	3.1	Restore all priority habitat to a favourable condition	BHNL (All partners, FC, FE, LNRS responsible authorities)	There are 4,724.43 ha of priority habitats covering 12.8% of the Blackdown Hills National Landscape There are 867 ha of ancient woodland covering 2.3% of the Blackdown Hills National Landscape. Investigate PAWS[10] woodland and create an Action Plan Prioritise improving the condition of priority habitat (and ensuring no deterioration) via actions 1.1 to 1.4 listed above	

[8] Is not necessarily the National Landscape staff unit

[9] *"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".*

[10] Plantation on Ancient Woodland

Theme	Sub-theme	Ref	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[8] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
	Target 4	3.2	Enhance the data baseline, particularly for areas outside designated sites, including refresh / ground-truthing priority habitat maps to improve their accuracy and coverage.	BHNL (All partners)	Note that the priority habitat inventory (PHI) is not considered definitive and underestimates the true extent of priority habitat. Other habitat inventories also underestimate the extent of habitat within mosaics Ascertain (by proxy) what condition all priority habitat is currently in, making assumptions e.g. best case (based on Devon Wildlife Trust data) is 50% 45% of woodland is in 'active management'	

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[8] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
	Target 4	3.3	Conserve and restore the characteristic 'patchwork' landscapes and habitat features for the Blackdown Hills National Landscape, particularly springline mires.	BHNL (All partners)	Value additional co-benefits including, 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	

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[8] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
	Target 2[11] and 3[12]	3.4	Undertake significant work to move SSSI sites from 'unfavourable recovering' to 'favourable'.	BHNL (NE)	This will require more condition surveying by Natural England and more incentives through Environmental Land Management (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)	

[11] *"Bring 80% of Sites of Scientific Interest (SSSIs) within Protected Landscapes into favourable condition by 2042"*

[12] *"60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028"*

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[8] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
	Target 1[13]	3.5	Focus on habitat creation in the highest priority areas, as per the Lawton hierarchy. [See habitat network opportunity/targeting map]	BHNL (NE, LNRS responsible authorities)	If the target was pro rata'd based for the Blackdown Hills National Landscape area without any local factors this would be 2,919.10 ha. This would be equivalent to 145.96 ha per year between 2022 and 2042 Use the BHNL Nature Recovery Plan to work with partners to agree how this target can be achieved	

[13] *"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)"*

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[14] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
4: CLIMATE						
	Mitigation: Target 6[15] and actions for shallow/ pockety peat	4.1	Produce a comprehensive **pathway to net zero** for the Blackdown Hills National Landscape following these steps agreed among the National Landscapes family:	BHNL (DCC, EDDC, MDDC, SC)	Using the greenhouse gas emission data from government (and other data sources) to identify key areas of emissions, Assess which areas the Blackdown Hills National Landscape and key partners can impact directly, and address emissions that are outside the jurisdiction of the National Landscape by engaging with local authorities, businesses, or other relevant stakeholders. 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	

[14] Is not necessarily the National Landscape staff unit

[15] *"Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050 relative to 1990 levels".*

Theme	Sub-theme	Ref	5 year Actions/projects (new or continuing)- *Strategic Delivery*	Lead partner[14] (supporting partners)	Targets/ Milestone- *BHNL Partnership delivery/ key role*	Deadline (FY)
					create a cohesive approach to climate action. 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	
	Adaptation:	4.2	Produce a **climate change adaptation management plan** for the Blackdown Hills National Landscape, linked with this management plan by 2028, and all future plans.	BHNL (DCC, EDDC, MDDC, SC)	Work collaboratively to address the risks and actions identified in the Blackdown Hills National Landscape climate change adaptation plan, seeking to highlight where actions from the Devon, Cornwall and Isles of Scilly Adaptation Plan and Somerset Climate Emergency Strategy to build resilience and allow communities and the natural world to adapt, can be most effective.	

Theme	**Sub-theme**	**Ref**	**5 year Actions/projects** (new or continuing)- *Strategic Delivery*	**Lead partner**[14] (supporting partners)	**Targets/ Milestone-** *BHNL Partnership delivery/ key role*	**Deadline** (FY)
	Adaptation	4.3			Refine the **climate adaptation risk assessment matrix** already drafted, which identifies the climate risks in the Blackdown Hills National Landscape and use the information to develop the required climate adaptation plan for the area:	

GLOSSARY			
National Landscape	Area of Outstanding Natural Beauty	HoSWLEP	Heart of South West Local Enterprise Partnership
BHNL	Blackdown Hills National Landscape	LA	Local Authority
EDNL	East Devon National Landscape	LNP	Local Nature Partnership
MHNL	Mendip Hills National Landscape	LPA	Local Planning Authority
NLA	National Landscapes Association	LWS	Local Wildlife Site
QHNL	Quantock Hills National Landscape	MDDC	Mid Devon District Council
BHPN	Blackdown Hills Parish Network	NE	Natural England
BHRGA	Blackdown Hills Rough Grazing Association	NT	National Trust
BC	Butterfly Conservation	OSG	Officer Support Group
DBRC	Devon Biodiversity Records Centre	PMG	Partnership Management Group
DCC	Devon County Council	SC	Somerset Council
DLPG	Devon Landscape Policy Group	SDF	Sustainable Development Fund
DWT	Devon Wildlife Trust	SERC	Somerset Environmental Records Centre
EA	Environment Agency	SM	Scheduled Monument
EDCP	East Devon Catchment Partnership	SWHT	South West Heritage Trust
EDDC	East Devon District Council	SWPLF	South West Protected Landscape Forum
FWAGSW	FWAG South West	SWT	Somerset Wildlife Trust
FC	Forestry Commission	WRT	Westcountry Rivers Trust
FF	Facilitation Fund	WT	Woodland Trust
HE	Historic England		
NLHF	National Lottery Heritage Fund		

Blackdown Hills National Landscape: Area of Outstanding Natural Beauty Management Plan 2025 - 2030

Strategic Environmental Assessment Screening Report

Final Draft

April 2025

Blackdown Hills National Landscape

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Executive Summary

This Screening Report has been produced to determine whether it is necessary to undertake a Strategic Environmental Assessment of the Blackdown Hills National Landscape 2025 – 2030 Area of Outstanding Natural Beauty Management Plan.

It is determined that full Strategic Environmental Assessment will not be required for the 2025 – 2030 Management Plan because the Plan demonstrates little deviation from its previous iterations. The 2014-2019 version was subject to full Strategic Environmental Assessment and the current revision is unlikely to display further significant environmental effects.

1 Introduction

1.1 The Blackdown Hills National Landscape Management Plan

Although now known as a National Landscape, 'Area of Outstanding Natural Beauty' (AONB) remains the legal term for the designation and so is referred to as such in legislation.

Section 82 of the Countryside and Rights of Way (CRoW) Act 2000 establishes the primary purpose of AONB designation as the conservation and enhancement of natural beauty. Section 85 of the CRoW Act (as amended by section 245 of the Levelling-up and Regeneration Act 2023) places a duty on all relevant authorities (public bodies) to 'seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. Under section 89, the relevant local authorities must prepare and publish a Management Plan for each AONB that "formulates their policy for the management of the area of outstanding natural beauty and for the carrying out of their functions in relation to it"; and keep it under review (every 5 years).

The Blackdown Hills National Landscape Management Plan (from hereon in referred to as 'the Management Plan') addresses this legal requirement by setting out the policy framework for the conservation and enhancement of the designated Blackdown Hills AONB for the next five years. Put simply, it describes the Special Qualities of the area and why the National Landscape is important, sets out an agreed long term vision for its future, identifies the challenges and opportunities for the area, and sets out objectives and policies for how these will be addressed.

The Management Plan 2025-2030 is the result of a review of the previous iteration (2019-2024), and is a revised and updated version of all previous management plans for the Blackdown Hills National Landscape. The first revision in 2009 and subsequent 2014–2019 management plan both underwent full Strategic Environmental Assessment (SEA).

1.2 Purpose of this Report

The purpose of Strategic Environmental Assessment (SEA) screening is to determine whether a plan, programme, or strategy is likely to have significant environmental effects, thus deciding if a full SEA is required.

This report has been produced to determine whether it is necessary to undertake an SEA of the Management Plan for 2025-2030. This is to ensure compliance with the Environmental Assessment of Plans and Programmes Regulations, 2004 (Statutory Instrument 2004 No. 1633), commonly referred to as 'The Strategic Environmental Assessment or SEA Regulations'.

The three statutory bodies for the purposes of SEA screening are Natural England, the Environment Agency and Historic England. These bodies will be consulted for their views on the conclusions of this screening assessment.

2 SEA Screening

2.1 SEA Guidance

This Screening Report has been developed in accordance with extant government guidance: A Practical Guide to the Strategic Environmental Assessment Directive (Office of the Deputy Prime Minister, 2005), and with reference to Strategic environmental assessment and sustainability appraisal - GOV.UK.

In 2012, Natural England, the National Association for AONBs and Defra published an 'Advice Note to AONB Partnerships, the Conservation Boards and Relevant Authorities on Management Plan Reviews', which gave guidance on considering the need for SEA:
'The requirements of the SEA and Habitats Directives, and the need for compliance with them, apply to new management plans, and to revisions or re-issues of existing management plans.

AONBs and National Park Authorities (protected landscape managing bodies) should screen their revised or amended Management Plan to evaluate whether the individual or cumulative effect of the changes which they are proposing is likely to have a significant effect, as defined under the Strategic Environmental Assessment or Habitats Regulations. They may wish to seek informal guidance from Natural England (and Environment Agency, English Heritage for SEA) at this screening stage'.

That same guidance goes on to state that:
'Given that all the extant AONB Management Plans have been assessed under the regulations, the AONB Partnership / Conservation Board (protected landscape managing body) may decide that the proposed changes to the extant plan are not likely to have a significant effect and may conclude that there is no requirement to carry out further assessment. The AONB Partnership / Conservation Board should record the screening decision and supporting reasons for it'.

2.2 Screening Process

The 2005 guidance referred to at Section 2.1 helpfully synthesises the requirements of the European SEA Directive, and as transposed into UK law by the SEA Regulations, into a flowchart to determine which plans and programmes require SEA.

Figure 1 shows the flowchart with the decision process applied for the Management Plan (blue arrows).

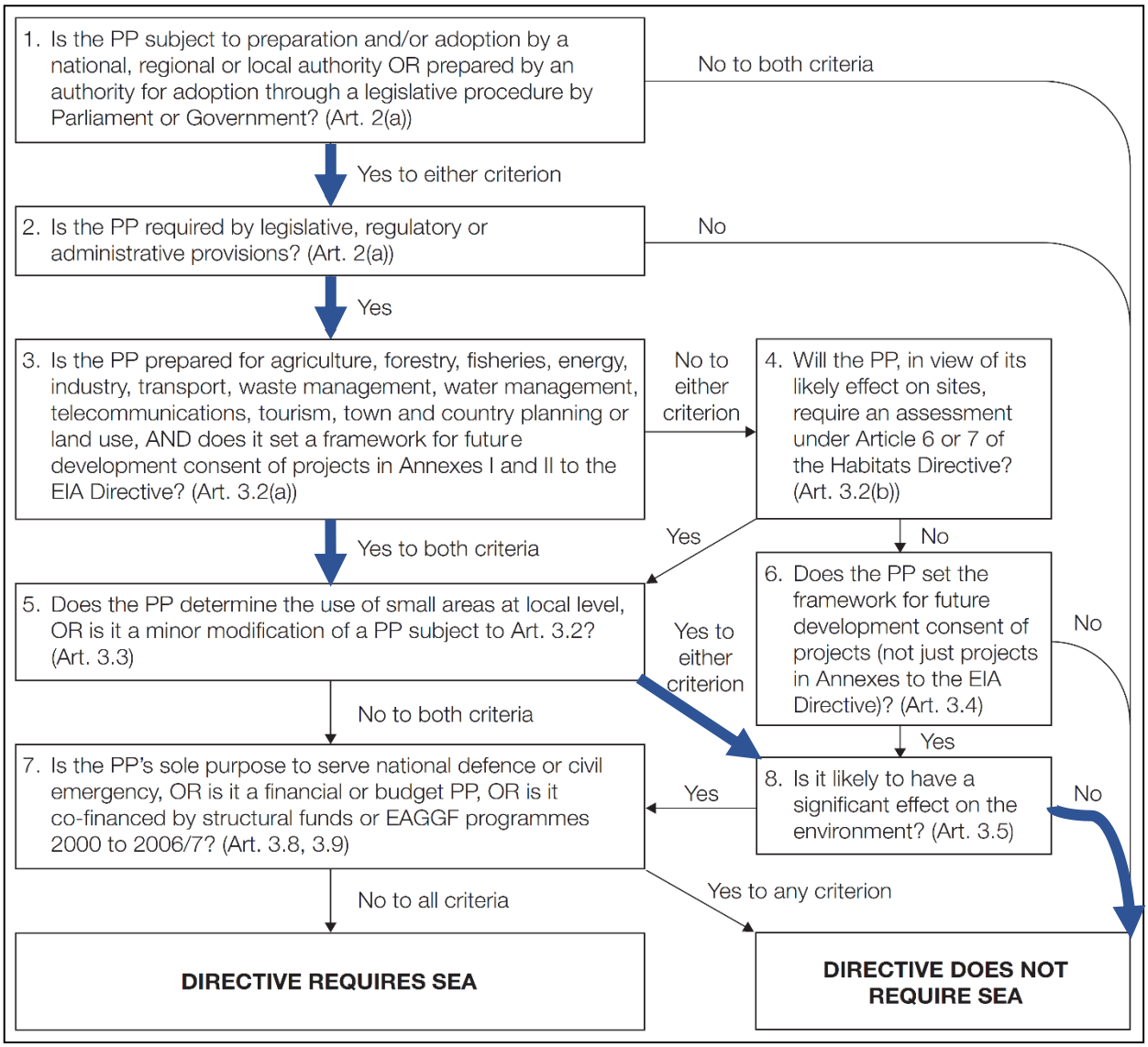

Figure 1 – SEA decision process for the Management Plan. Flowchart taken from "A Practical Guide to the Strategic Environmental Assessment Directive" (Office of the Deputy Prime Minister, 2005). 'PP' is an abbreviation for 'Plan or Programme'. Article numbers refer to those of the SEA Directive.

Table 1 provides an explanation for the decisions taken within the flowchart in Figure 1.

Flowchart Question	Decision	Explanation
1. Is the PP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2 (a))	Yes	The Management Plan is being prepared by the Blackdown Hills National Landscape Partnership through delegation from Devon County Council, Somerset Council, East Devon District Council, and Mid Devon District Council, and it will be adopted by them.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Yes	Part IV, Section 89 of the Countryside and Rights of Way Act 2000 sets out the requirement for Local Authorities to publish and review a management plan for their AONB.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consents of projects in Annexes I and II to the EIA Directive? (Art. 3.2 (a))	Yes	Although the Management Plan is not explicitly prepared to cover these topics, it could arguably influence all of them within the Blackdown Hills National Landscape. Whilst it is unlikely that development of the scale described for projects in Annexes I and II of the EIA Directive (Schedule 1 and 2 EIA Regulations) will occur in the Blackdown Hills National Landscape as a matter of course, the Management Plan nonetheless would be used as a “framework for future development consent” – all the more so in the context of relevant authorities duty to seek to further the purpose of designation. The “framework” is defined by the European Commission[1] as "criteria or conditions that guide the way the consenting authority decides an application for development consent. Such criteria could place limits on the type of activity or development which is to be permitted in a given area; or they could contain conditions which must be met by the applicant if permission is to be granted; or they could be designed to preserve certain characteristics of the area concerned”.
4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6	Non-Applicable	

[1] European Commission (2001) *Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment*

Flowchart Question	Decision	Explanation
or 7 of the Habitats Directive? (Art 3.2 (b))		
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art 3.2? (Art 3.3)	Yes	The Management Plan does not "determine the use of small areas at local level". The European Commission[1] suggest that this phrase is intended to refer to plans that, for example, outline how buildings must be constructed. However, the Management Plan is a minor modification to the 2019-2024 Management Plan. The European Commission advise that the interpretation of 'minor' must consider the likelihood that the modified elements of the plan will lead to significant environmental effects. See Flowchart Question 8 below.
6. Does the PP set the framework for future development consent of projects ? A narrower interpretation of 'framework for development consents' would exclude the (not just projects in Annexes to the EIA Directive) (Art 3.4)	Non-Applicable	
7. Is the PP's sole purpose to serve national defence or civil emergency, or is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7 (Art 3.8, 3.9)?	Non-Applicable	
8. Is it likely to have a significant effect on the environment? (Art 3.5)	No	Firstly, looking strategically, the PP does not propose uses or make allocations, and the improvements to the National Landscape resulting from the strategic direction given by the Management Plan are unlikely to have negative effects on the environment. In addition, the objectives of the Management Plan (reflecting the purpose of designation) seek to conserve and enhance the special qualities of the National Landscape, which will have a moderating impact on any development and other actions that may seek to modify the environmental character of the National Landscape.

Flowchart Question	Decision	Explanation
		Furthermore, the vision of the Management Plan, although updated, remains true to the previous version, and the environmental outcomes of the revised objectives and policies are not substantially or significantly different – see Appendices 1 and 2 of this report.

2.3 Screening Conclusion

It is determined that an SEA will not be required for the 2025-2030 Management Plan because the Plan demonstrates little deviation from its previous iteration (as described in Appendices 1 and 2).

The previous version (2019-2024) was itself an iteration of the 2014-2019 plan which was subject to full SEA. As such it is concluded that therefore the current revision is unlikely to display further significant environmental effects and hence the modifications are considered minor within the context of question 5 in the flowchart shown in Figure 1.

Appendix 1 – Comparison of Management Plan Objectives

The table below compares the 2019 – 2024 Management Plan objectives (as updated post-public consultation) with the proposed objectives for the 2025-2030 Management Plan. The objectives and policies were checked and compared to identify and determine whether the modifications are minor or could lead to outcomes that would result in the plan having a significant effect on the environment.

Proposed Objective 2025-2030	Similar Objectives 2019-24	Notes on likely significance of any divergence to the environment
PLACE		
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.	Objective NC To conserve and enhance the natural capital stock of the AONB and maximise the flow of ecosystem goods and services they provide	**Minor Positive.** The proposed objective recognises there may be requirement to restore features as well as conserve and enhance.
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	Objective FLM To support sustainable farming and forestry practices that conserve and enhance the special qualities of the AONB and deliver a range of ecosystem services	**None.** The proposed objective in the 2025-2030 Management Plan achieves the same outcome.
To strengthen the Blackdown Hills special sense of place, with a diversity of landscape patterns and pictures, unique geology, archaeology, and buildings of architectural appeal, through sound custodianship	Objective LC To ensure that the distinctive character and qualities of the Blackdown Hills landscape are understood, conserved, enhanced and restored Objective CH To ensure effective conservation, management and understanding of the Blackdown Hills historic environment, including historic buildings, archaeological sites and heritage landscapes Objective PD To conserve and enhance the natural beauty of the Blackdown Hills by ensuring that all development affecting the AONB is of the highest quality, sensitive to landscape setting and conserves its wildlife, historic character and other special qualities	**None.** The proposed objective in the 2025-2030 Management Plan achieves the same outcome. The three previous objectives collectively are concerned with strengthening sense of place through sound custodianship.

Proposed Objective 2025-2030	Similar Objectives 2019-24	Notes on likely significance of any divergence to the environment
PEOPLE		
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.	Objective CC To foster vibrant, healthy and resilient communities who enjoy a high quality of life and feel connected to the AONB and its special qualities	**None.** The proposed objective in the 2025-2030 Management Plan achieves the same outcome.
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.	Objective RET To sustain a local economy that makes wise use of the resources of the AONB and conserves and enhances the natural beauty of the Blackdown Hills Objective CC To foster vibrant, healthy and resilient communities who enjoy a high quality of life and feel connected to the AONB and its special qualities	**None.** The proposed objective in the 2025-2030 Management Plan achieves the same outcome.
To ensure that appropriate opportunities to explore and enjoy the Blackdown Hills countryside and its special qualities that are compatible with conserving and enhancing natural beauty are available to all and that everyone feels welcome.	Objective AE To ensure that opportunities to explore and enjoy the Blackdown Hills countryside and special qualities are compatible with conserving and enhancing natural beauty	The parallel Habitat Regulations Assessment proposes that this objective is amended to include the reference to conserving and enhancing natural beauty, and that being so, there is **no divergence**.
To commit to eliminate discrimination, provide equal opportunities, and challenge prejudice and foster good relationships between diverse groups in and around the Blackdown Hills.	No direct equivalent, but is relatable to; Objective CC To foster vibrant, healthy and resilient communities who enjoy a high quality of life and feel connected to the AONB and its special qualities	This is outside the scope of SEA, as it seeks to address equality, diversity and inclusion.
NATURE		
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	Objective BG To conserve geodiversity and ensure effective conservation, enhancement, expansion and connectivity of habitats, forming coherent and resilient ecological networks across the Blackdown Hills and	**None.** The proposed objective in the 2025-2030 Management Plan achieves the same outcome. Geodiversity is now addressed in the Place theme and is encapsulated in the relevant objective there.

Proposed Objective 2025-2030	Similar Objectives 2019-24	Notes on likely significance of any divergence to the environment
species of conservation concern across the landscape.	beyond, facilitating the movement of priority species across the landscape	
CLIMATE		
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.	Objective NC To conserve and enhance the natural capital stock of the AONB and maximise the flow of ecosystem goods and services they provide	**None**. The new objective deals with a specific element of natural capital stock and relevant ecosystem services.
To promote and deliver nature-based solutions to climate change.	Objective NC To conserve and enhance the natural capital stock of the AONB and maximise the flow of ecosystem goods and services they provide	**None**. The new objective deals with a specific element of natural capital stock and relevant ecosystem services.
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.	No direct objective, but aligns with policies NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint PM1 Encourage co-ordination and partnership amongst the wide range of national, regional and local agencies and organisations to secure funding for the care and enhancement of the AONB	**Minor positive**. The new objective deals with a specific, important priority that was not specifically spelt out previously. It is more pro-active than the previous comparable policy.

Appendix 2 - Comparison of Management Plan Policies

The table below compares the 2019 - 2024 Management Plan policies (as updated post-public consultation) with the proposed policies for the 2025 - 2030 Management Plan.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
PLACE		
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.	LC1 Approach the conservation and enhancement of the AONB based on landscape character underpinned by comprehensive and up-to-date evidence bases that are also made widely available to decision makers and others NC3 Support studies, research and improve understanding of the AONB's rich stock of natural capital and ensure that its value to society (in terms of the flow of goods and services) is recognised and understood by decision-makers and others	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them, reflecting the revised themes of the new plan.
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.	LC7 Opportunities will be sought to strengthen landscape character by improving the condition of landscape features in poor condition and reinstating landscape features identified as missing or fragmented	**Minor positive**. The amended policy wording provides a fuller framework, reiterating the purpose of designation, but does not alter the outcome.
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.	NC1 Promote a catchment, multiple-benefit, collaborative-based approach to soil conservation, water quality and flood alleviation improvements utilising the Otter, Axe, Culm and Parrett/Tone catchments	**Minor positive**. Amended wording to include soil restoration and improving resilience are typical of such an approach.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
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.	NC2 Improve land management in respect of the control of surface water run-off, to mitigate against flooding during more extreme weather events. Where appropriate within the landscape, seek to reinstate or improve the management of woodland, wetland and hedges to slow and store run-off	**None**. The amended policy wording does not alter the outcome.
PL5 A profitable, sustainable and environmentally beneficial farming, forestry 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.	FLM1 A profitable, sustainable and environmentally beneficial farming and land management sector providing a range of public goods and services will be fostered as one of the principal means of maintaining the special qualities and distinctive landscape of the AONB	**None.** No change to policy, other than including forestry as a separate sector.
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.	FLM2 Encourage a high take-up of agri-environment schemes, especially high quality environmental land management that helps conserve and enhance the natural beauty through sustainable farming and forestry practices	**None**. The amended policy wording does not alter the outcome.
PL7 Encourage the production and marketing of local food, timber and other agricultural and wood products where these are compatible with the National Landscape and purpose of designation.	FLM4 Encourage the production and marketing of local food and other agricultural products where these are compatible with the AONB designation	**None.** No change to policy, other than including wood products as a separate sector.
PL8 Encourage sensitive management of field boundaries and hedgerow trees, woodlands, orchards and ponds, protect ancient woodland and veteran trees, and restore the original broadleaved character of plantations on ancient woodland sites.	FLM5 Support and promote initiatives that encourage sensitive environmental management of field boundaries and hedgerow trees, woodlands, particularly those that conserve ancient woodland and veteran trees, orchards and restore the	**Minor.** The policy has been amended to include ponds, and the wording simplified, but this does not alter the intended outcome.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
	original broadleaved character of plantations on ancient woodland sites	
PL9 Encourage well managed 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.	FLM6 Give careful consideration to the landscape and visual impact of new woodland planting schemes	**Minor positive**. The amended policy wording provides a more detailed framework, but does not alter the outcome.
PL10 Monitor, manage and mitigate damaging diseases such as ash dieback that have potential to impact negatively on landscape and biodiversity.	FLM7 Monitor, manage and mitigate damaging diseases such as ash dieback	**None**. The amended policy wording does not alter the outcome.
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.	FLM9 Wider community engagement with the farming and land management sector will enable a deeper understanding of the important role played by land managers in maintaining the AONB's special qualities	**None**. The policy has been amended by the inclusion of 'encourage' – this was the intent of the previous policy but it was missed in error. It does not alter the outcome.
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.	CH1 Conserve and enhance the historic built environment and rural heritage assets and integrate into other land management initiatives in the AONB CH2 Monitor the extent and condition of historic sites, features and landscapes in the AONB and promote the use of Historic Environment Record (HER), historic landscape characterisation and other tools to inform projects, policy-making and management activities	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them.
PL13 Monitor the extent and condition of historic sites, features and landscapes across the Blackdown Hills and seek to address	CH2 Monitor the extent and condition of historic sites, features and landscapes in the AONB and promote the use of Historic	**Minor positive**. Part of the old policy has been incorporated into a separate new policy. The amended policy wording provides

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
sites and features in poor and declining condition.	Environment Record (HER), historic landscape characterisation and other tools to inform projects, policy-making and management activities	a more detailed framework, but does not alter the outcome.
PL14 Promote awareness and understanding of the geology and geomorphology of the Blackdown Hills and secure effective management of important features and sites.	BG4 Ensure sites of geological and geomorphological importance are appropriately managed to conserve their special features and reduce impacts of development	**None**. The amended policy wording does not alter the outcome.
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. Ensure that conserving and enhancing landscape and scenic beauty is given great weight.	PD1 All relevant local and neighbourhood plan documents and planning decision-making will have regard to the AONB purpose, the management plan and other AONB statements and guidance, and ensure that conserving and enhancing the special qualities of the AONB is given great weight	**Minor positive**. The new policy has been updated to reflect the updated duty to further the purpose of designation.
PL16 All development affecting the Blackdown Hills National Landscape should 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. Seeking to protect and enhance natural features and biodiversity.	PD2 All necessary development affecting the AONB 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	**None.** The amended policy wording does not alter the outcome..

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
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.	LC3 Promote high levels of peace and tranquillity with dark night skies by minimising noise, intrusive development and light pollution	**None**. The amended policy wording does not alter the outcome.
PL18 The character of skylines and open views into, within and out of the National Landscape will be protected and enhanced.	LC5 The character of skylines and open views into, within and out of the AONB will be protected	**Minor positive.** The amended policy wording provides a fuller framework, reiterating the purpose of designation, but does not alter the outcome.
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.	LC6 The deeply rural setting of much of the land adjoining the AONB boundary forms an essential setting for the AONB and care will be taken to maintain its quality and character	**None.** No change to policy.
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.	PD4 Support the provision of affordable housing to meet identified local needs in locations with access to employment and local services, ensuring that developments are appropriately scaled and sited to respect landscape and settlement character, and avoiding impacts on nature conservation and historic interests CC2 Community-led planning tools (neighbourhood plans, parish plans, village design statements and others) that contribute to conserving and enhancing the AONB will be supported	**None**. The amended policy wording does not alter the outcomes. The design related detail of previous policy PD4 is covered by PL16 which covers any development.
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	TH1 Road and transport schemes (including design, maintenance, signage, landscaping and safety measures) affecting the AONB will be undertaken in a manner that is sensitive and appropriate to landscape character, having regard to the purpose of AONB	**None**. The amended policy wording does not alter the outcome.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
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.	designation and conserving and enhancing the area's special qualities. The landscape and cultural features of the AONB's road network (including hedge banks, flower-rich verges, and locally distinctive historic highway furniture) will be protected and conserved	
PEOPLE		
PE1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of sensitive and sustainable opportunities for volunteering and 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.	AE3 Opportunities to use the Blackdown Hills AONB to benefit the health and well-being of residents and visitors will be sought and promoted, seeking a range of sensitive and sustainable access opportunities for users of all abilities to enjoy the special qualities of the AONB CEA1 Through promotion and education make more people aware of what makes the Blackdown Hills special, inspiring them to help care for the area and contribute to its conservation and enhancement	**None**. The amended policy wording does not alter the outcome.
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.	AE1 Take a coordinated, strategic and planned approach to the management of public rights of way and publicly accessible land to achieve an accessible, well-connected network that conserves and enhances the special qualities of the AONB, avoids impact on sensitive sites and minimises conflict between different interests AE2 Opportunities will be sought to extend and improve the rights of way network, including improving connections with surrounding settlements where this is	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
	compatible with conserving and enhancing natural beauty	
PE3 Opportunities to use the natural and historic environment resource of the Blackdown Hills to benefit the health and well-being of residents and visitors which are compatible with conserving and enhancing natural beauty will be sought and promoted, particularly where this will enhance landscape, biodiversity, heritage and access.	AE3 Opportunities to use the Blackdown Hills AONB to benefit the health and well-being of residents and visitors will be sought and promoted, seeking a range of sensitive and sustainable access opportunities for users of all abilities to enjoy the special qualities of the AONB CC4 Support local community engagement in cultural and natural heritage initiatives within the AONB CEA2 Develop and support a range of opportunities for active engagement with the countryside, wildlife and heritage of the Blackdown Hills AONB, promoting the benefits that the natural environment provides to us	The parallel Habitat Regulations Assessment proposes that this policy is amended to include the reference to sensitive and sustainable access opportunities as previously, and that being so, there is **no divergence,** and the outcomes from the previous policies will be achieved by the proposed new policy, which combines them.
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	CC1 Local communities will be supported to identify, plan, and provide for their own needs, in undertaking community activities to encourage sustainable lifestyles, reinforce local cultural traditions, and in celebrating their achievements and strengths CC3 Support and promote initiatives that help to provide, retain or enhance community facilities and services where they are compatible with conserving and enhancing natural beauty	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them.
PE5 Support the principle of local markets and sustainable local products where it adds	FLM4 Encourage the production and marketing of local food and other agricultural	**None**. Policy FLM4 has not been carried forward, but it is not necessary to as it is

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
value to the local economy without compromising the conservation and enhancement of natural beauty and the special qualities of the Blackdown Hills National Landscape	products where these are compatible with the AONB designation RET1 Support the principle of local markets and sustainable local products where it adds value to the local economy without compromising the conservation and enhancement of natural beauty and the special qualities of the AONB	encapsulated by old policy RET1 and the new policy.
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.	RET2 Economic capacity, employment and skills in the area will be supported through training opportunities, community enterprise, business networking and cooperation especially where these assist businesses to contribute to AONB purposes	**None**. The amended policy wording does not alter the outcome.
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.	RET3 Tourism and recreation provision will contribute to the local economy without harming the Blackdown Hills landscape, historic environment, biodiversity or tranquillity, and respecting the special qualities of the AONB	**None**. The amended policy wording does not alter the outcome.
PE8 Support efforts to secure and improve fast and reliable broadband and mobile phone coverage without adversely affecting special qualities	RET4 Support efforts to secure and improve superfast broadband and mobile phone coverage in the AONB without adversely affecting special qualities	**None**. The amended policy wording does not alter the outcome.
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	TH2 Traffic management measures will be supported which reduce the impact of large and heavy vehicles on the most minor roads and help to provide a safer environment for walking, cycling and horse riding, where this is compatible with conserving and enhancing natural beauty	**None.** No change to policy.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
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	TH3 Promote the development of high quality, integrated and sustainable transport services and initiatives in and around the AONB where they can be achieved without compromising the conservation of natural beauty and local character	**None.** No change to policy.
NATURE		
N1 Use the Lawton *making space for nature* principles of 'better, bigger, more and joined' to create networks that are fit for purpose for nature to thrive in and adapt to climate change.	BG1 Take a strategic landscape-scale based approach to the creation, restoration and maintenance of habitats within the AONB (focussing on designated and undesignated priority sites) in order to ensure resilience to climate change and other pressures BG2 Connect habitats at a landscape scale and ensure permeability for species movement within coherent and resilient ecological networks	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them.
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.	BG1 Take a strategic landscape-scale based approach to the creation, restoration and maintenance of habitats within the AONB (focussing on designated and undesignated priority sites) in order to ensure resilience to climate change and other pressures	**Minor positive**. The new policy deals with a specific aspect of the 'strategic landscape-scale based approach' of the old policy. Both are concerned with positive habitat management.
N3 Species of conservation concern will be conserved. Targeted action will be taken to support the recovery of champion/priority/indicator species.	BG3 Priority species (including Section 41, Devon Special Species, Protected Species) will be conserved. Targeted action will be taken to support the recovery of priority species	**None**. The amended policy wording does not alter the outcome.
N4 All public bodies within the Blackdown Hills National Landscape must have regard to Local Nature Recovery Strategy (LNRS).	No direct equivalent, but is within the context of;	**Minor positive**. Policy N4 is specific to local nature recovery strategies, which is

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
There should be alignment between the National Landscape and LNRS needs, and LNRS opportunities need to be reflected in partnership delivery on the ground.	PM1 Encourage co-ordination and partnership amongst the wide range of national, regional and local agencies and organisations to secure funding for the care and enhancement of the AONB	something the more general previous policy PM1 would cover.
N5 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.	BG6 A strategic approach to the control, or eradication where feasible, of invasive non-native species will be taken where they threaten or damage local habitats and species and where action is practicable	**None.** No change to policy.
N6 Increased recreational pressure will be resisted at locations where unacceptable damage or disturbance to vulnerable habitats or species is likely to arise.	BG7 Increased recreational pressure will be resisted at locations where unacceptable damage or disturbance to vulnerable habitats or species is likely to arise	**None.** No change to policy.
CLIMATE		
C1 To transition to net zero, support communities, businesses 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.	NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint CC1 Local communities will be supported to identify, plan, and provide for their own needs, in undertaking community activities to encourage sustainable lifestyles, reinforce local cultural traditions, and in celebrating their achievements and strengths TH3 Promote the development of high quality, integrated and sustainable transport services and initiatives in and around the AONB where they can be achieved without compromising the conservation of natural beauty and local character	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them, reflecting the revised themes of the new plan.
C2 Use less energy to reduce the amount of new energy infrastructure required to meet net zero.	NC4 Encourage local communities, businesses and visitors to respect the	**Minor positive**. The new policy deals with a specific aspect of the old more general NC4 policy in line with the revised themes of the

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
	environment and minimise their carbon footprint PD3 Support measures to improve energy efficiency and resource use and support appropriate small scale renewable energy schemes that do not detract from historic character or visual amenity, and do not conflict with the special qualities of the AONB or the conservation of natural beauty	new plan. The outcomes from the previous policies will be achieved by the proposed new policy.
C3 Transition to renewables; energy used within the area needs to rise to near 100% renewable by 2050. The transition to low carbon and renewable energy should be undertaken in a way that seeks to further the conservation and enhancement of the natural beauty of the Blackdown Hills National Landscape, and is compatible with its special qualities, landscape character and heritage value.	NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint PD3 Support measures to improve energy efficiency and resource use and support appropriate small scale renewable energy schemes that do not detract from historic character or visual amenity, and do not conflict with the special qualities of the AONB or the conservation of natural beauty	**None**. While the new policy has a specific driver, the outcomes from the previous policies will be achieved by the proposed new policy.
C4 Reduce Greenhouse Gas (GHG) emissions through encouraging sustainable farming practices and maximise carbon storage in the environment by encouraging interventions such as tree planting and peaty soil restoration.	NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint FLM1 A profitable, sustainable and environmentally beneficial farming and land management sector providing a range of public goods and services will be fostered as one of the principal means of maintaining the special qualities and distinctive landscape of the AONB	**Minor positive**. The new policy deals with a specific aspect of the old more general NC4 policy and policy FLM1 in line with the revised themes of the new plan. The outcomes from the previous policies will be achieved by the proposed new policy.
C5 Develop demand for sustainably produced food.	FLM4 Encourage the production and marketing of local food and other agricultural	**Minor positive**. The previous policy was focused on local food production, where compatibility with the AONB designation

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
	products where these are compatible with the AONB designation	could be deemed to equate to 'sustainably produced'. The new policy seeks to shift demand to such products.
C6 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.	NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint CC1 Local communities will be supported to identify, plan, and provide for their own needs, in undertaking community activities to encourage sustainable lifestyles, reinforce local cultural traditions, and in celebrating their achievements and strengths	**Minor positive**. The new policy deals with a specific aspect of the old more general NC4 and CC1 policies in line with the revised themes of the new plan. The outcomes from the previous policies will be achieved by the proposed new policy.
C7 Reduce emissions from unavoidable biodegradable waste and wastewater treatment.	NC1 Promote a catchment, multiple-benefit, collaborative-based approach to soil conservation, water quality and flood alleviation improvements utilising the Otter, Axe, Culm and Parrett/Tone catchments NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint	**Minor positive**. The new policy deals with a specific aspect of the previous more general NC4 and NC1 policies in line with the revised themes of the new plan. The outcomes from the previous policies will be achieved by the proposed new policy.
C8 Develop and encourage measures which reduce energy usage in existing buildings and improve energy efficiency for all buildings using low carbon technology in all refurbishment, regeneration and improvement schemes. As part of the transition, new buildings need to be net zero as soon as possible.	NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint PD3 Support measures to improve energy efficiency and resource use and support appropriate small scale renewable energy schemes that do not detract from historic character or visual amenity, and do not conflict with the special qualities of the AONB or the conservation of natural beauty	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them, reflecting the revised themes of the new plan.

Proposed policy 2025-2030	Similar 2019 – 2024 Management Plan Policies	Divergence of environmental outcomes
C9 Reduce the need to travel and support the development of sustainable low carbon transport and active travel options, while working to avoid leaving any community isolated.	NC4 Encourage local communities, businesses and visitors to respect the environment and minimise their carbon footprint TH3 Promote the development of high quality, integrated and sustainable transport services and initiatives in and around the AONB where they can be achieved without compromising the conservation of natural beauty and local character	**None**. The outcomes from the previous policies will be achieved by the proposed new policy, which combines them, reflecting the revised themes of the new plan.

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Blackdown Hills National Landscape

Appropriate Assessment Screening of the Blackdown Hills National Landscape Management Plan 2025-30 (Pre-adoption final draft version January - April 2025)

Prepared by: The Blackdown Hills National Landscape Partnership
April 2025

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1 Introduction

This report presents the results of the screening and assessment stages of the Appropriate Assessment (AA) process for the Blackdown Hills National Landscape Management Plan 2025-30. This entails a review of the proposed Plan (the consultation draft and any further relevant amendments were considered) to identify any 'Likely Significant Effects' (LSEs) on the conservation objectives of European sites. If, following screening, LSEs are anticipated, subsequent stages of AA would consider these in more detail and determine whether alternative measures could be adopted. If there are no viable alternatives, a Plan can only be implemented if there are 'imperative reasons of overriding public interest'.

1.1 The Structure of this Report

This chapter (Chapter 1) explains the requirement for AA for the National Landscape Management Plan, summarises the AA process and explains the purpose of screening in more detail.

Chapter 2 identifies the European Sites which could be affected.

Chapter 3 summarises the plan to be assessed: the Blackdown Hills National Landscape Management Plan 2025-30. It presents the results from screening of objectives and policies and identifies possible effects on European Sites. Screening matrices are provided as Tables 4 and 5.

Chapter 4 sets out a more detailed assessment of some objectives and policies.

Chapter 5 explains why in this case potential "In Combination Effects" are not analysed.

Chapter 6 draws a conclusion for the screening process.

Appendix 1 provides details of the European sites included in the assessment.

1.2 The European Habitats Directive

The Habitats Regulations [The Conservation of Habitats & Species Regulations 2017 (as amended)] transpose the requirements of the European Habitats Directive (92/43/EEC) that aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as *Natura 2000 sites* or *European Sites* and comprise *Special Areas of Conservation* (SACs) and *Special Protection Areas* (SPAs). The UK Government also requires that *Ramsar* sites (that support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are included within the HRA process (and as required by the Regulations).

A competent authority must carry out an assessment under the Habitats Regulations, known as a *Habitats Regulations Assessment* (HRA), to test if a 'plan or project' could significantly harm the designated features of a European site (also known as 'habitat sites').

All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This

consideration should take into account the potential effects both of the plan/project itself and in combination with other plans or projects. The process of HRA is based on the precautionary principle and where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view the site's conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site.

In 2018, the Court of Justice of the European Union (CJEU) issued a judgment (People over Wind & Sweetman v Coillte Teoranta Case C-323/17), which ruled that Article 6(3) of the Habitats Directive must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an appropriate assessment (AA), and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European site at the initial screening stage.

1.3 The Appropriate Assessment (AA) Process

The purpose of AA is to ensure that significant effects on European sites are avoided. The assessment is carried out solely in respect of the 'conservation objectives' for which a European site has been designated and its integrity in relation to its ability to support those objectives. There are four stages:

- *Stage One: Screening*
  - To identify the likely impacts on a European site of a project or plan, either alone or in combination with other projects or plans, and consider whether these impacts are likely to be significant;

- *Stage Two: Appropriate Assessment (where there are likely to be significant impacts)*
  - To consider the impact on the integrity of the European site of the project or plan, either alone or 'in combination' with other projects or plans, with respect to the structure, function and conservation objectives of the site. Additionally, where there are adverse impacts, to assess the potential mitigation of those impacts;

- *Stage Three: Assessment of alternative solutions*
  - To examine alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the European site;

- *Stage Four: Assessment where no alternative solutions exist (where adverse impacts remain)*
  - To assess compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest, it is deemed that the project or plan should proceed.

Each stage determines whether a further stage in the process is required. If, for example, the conclusions at the end of Stage One are that there will be no significant impacts on the European site, there is no requirement to proceed further.

1.4 The Appropriate Assessment of the National Landscape Management Plan

Natural England considers that National Landscape Management Plans are plans which could have significant effects (both positive and negative) on European sites. Thus, they should be assessed before formal adoption.

When undertaking HRA on a plan, it is important to ensure that the assessment is carried out at an appropriate scale and level of detail. The Blackdown Hills National Landscape Management Plan is reviewed at 5-yearly intervals and provides a strategic framework for partnership working comprising a long-term Vision for a vibrant and sustainable landscape and responding to climate change and nature recovery. It includes aspirational Guiding Principles and Objectives with targets and policies for guiding management of the National Landscape within the context of conserving and enhancing natural beauty. Such a management plan does not include allocations for development nor locationally specific plans or projects, which are more likely to have potential significant effects on the protected European sites.

This HRA screening is being undertaken in accordance with good practice; the available guidance on process; and using the following principles:

- Use existing information
- Systematic and as simple as possible whilst retaining a robust process
- Proportionate assessment – the management plan is a strategic management plan for conserving and enhancing natural beauty

This report documents the AA process to provide the information required for the Blackdown Hills National Landscape Partnership to determine whether further stages of Appropriate Assessment are required for the National Landscape Management Plan. The assessment process was undertaken on the Consultation Draft of the Management Plan as amended, and will be subject to confirmation by Natural England (as the statutory nature conservation body).

1.5 Approach

Stage 1: Screening

The purpose of screening (this stage) is to identify whether any European site might be exposed to Likely Significant Effects (LSEs) and therefore to determine whether further stages of AA would be required.

This screening assessment comprises three steps:

One	Describing the Management Plan and possible impacts
Two	Identifying the *potential* effects on the European sites
Three	Assessing the ***significance*** of any effects on the European sites

The actual ‘screening’ evaluation is being completed as a two stage process:

Preliminary considerations (Step 2 above) considers the vulnerabilities of each site, and what potential impacts may be damaging to the site, this then ‘screens out’ policies that clearly have no possible negative impacts.

For some policies the decision of No Likely Significant Effect will be obvious, and these can be screened out immediately. At the other extreme, some policies may very clearly have a Likely Significant Effect. These policies will need to be taken forward for ‘appropriate assessment’ or removed from the Management Plan.

In other cases the judgement about a Likely Significant Effect will be less clear cut. It is in these cases that it is necessary to consider further the nature of the potential effect. This is the purpose of the fuller considerations (Step 3 above) assesses the potential impacts of each policy on the specific conservation objectives of the site, the significance of such an impact and the degree of risk of it occurring.

it is important to consider the possibility of impacts for any European site which might be affected, whatever its location, given the activities included in the plan and their range of influence. This may extend some distance from the area within the immediate influence of a plan.

Sites which could possibly be affected were identified and information obtained about designated interest features and associated conservation objectives, largely using information contained on the JNCC and Natural England websites. These were reviewed against the Management Plan objectives and policies that might affect interest features or the ability to achieve favourable condition.

2 European Sites Potentially Affected

Initial screening centred on the Appropriate Assessment Screening of the previous National Landscape Management Plan, together with checks on the JNCC online record of European sites for any additions or amendments that may have been made since 2019. Two European sites were immediately identified that might possibly be affected by the Blackdown Hills National Landscape Management Plan and should be subject to Appropriate Assessment Screening.

These are:

- Quants SAC
- River Axe SAC (outside of the National Landscape but within 50 metres of the boundary at its nearest point)

The following European sites are within 15km of the National Landscape but have not previously been included in HRA screening because of their distance from the National Landscape boundary and the absence of any impact pathway that might indicate that activity within the National Landscape could have an effect on the site. The distances at the nearest points are also shown.

- Beer Quarry and Caves SAC (9.0km)
- Holme Moor and Clean Moor SAC (7.8km)
- Sidmouth to West Bay SAC (8.9km)
- Lyme Bay and Torbay SAC (8.6km)
- East Devon Heaths SPA (11.6km)
- East Devon Pebblebed Heaths SAC (11.6km)
- Somerset Levels and Moors SPA (6.8km)
- Somerset Levels and Moors Ramsar Site (6.8km)
- Hestercombe House SAC (8.1km)

However, since the preparation of previous management plans, in August 2020 Natural England issued an Advice Note to the former Somerset Councils regarding the implications of the Court of Justice of the European Union CJEU case known as the “Dutch N” in relation to high levels of phosphate and planning applications that may affect the Somerset Levels and Moors Ramsar and Special Protected Area (SPA) European Sites.

The ruling has resulted in greater scrutiny of plans or projects that are likely to, either directly or indirectly, increase nutrient loads to these internationally important sites where a reason for their unfavourable condition is an excess of a specific pollutant.

In March 2022, Natural England issued similar advice to East Devon District Council (and some of the Somerset Councils) about phosphates in the River Axe.

The catchments of both the Somerset Levels and Moors Ramsar and River Axe SAC include areas within the Blackdown Hills National Landscape, see Figure 1.

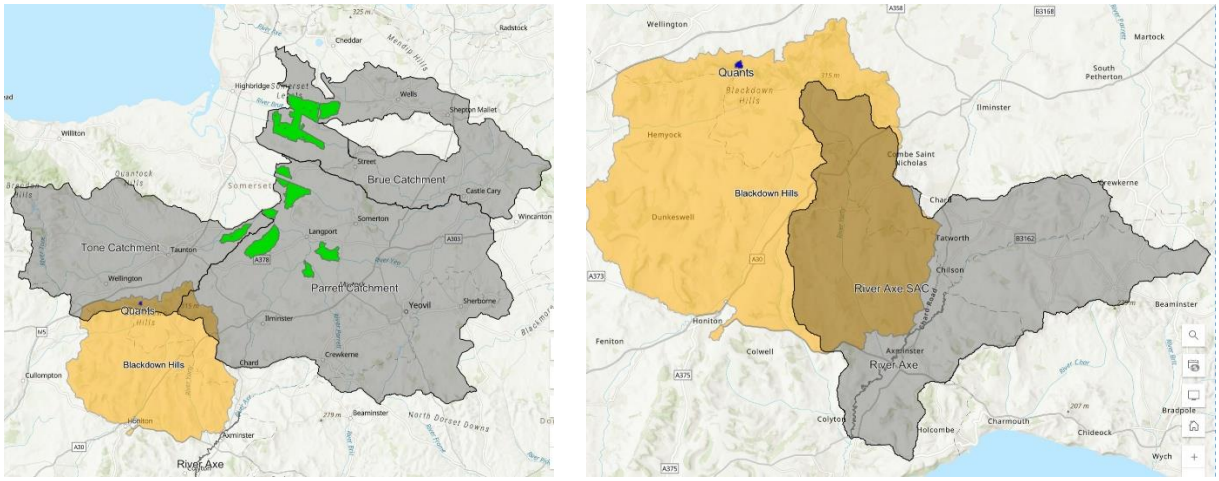

Figure 1 Nutrient Neutrality Catchment Areas in relation to Blackdown Hills National Landscape

The Somerset Levels and Moors are designated as an SPA under the Habitat Regulations 2017 and listed as a Ramsar Site under the Ramsar Convention. The Ramsar Site broadly covers the same area as the Somerset Levels and Moors SPA. While the SPA is designated for its international waterbird communities, the Ramsar Site is designated for its internationally important wetland features including the floristic and invertebrate diversity and species of its ditches, which is shared as a designated feature of the underpinning Sites of Special Scientific Interest (SSSIs). The interest features of the Ramsar Site are considered unfavourable, or at risk, from the effects of eutrophication caused by excessive phosphorous. The vast majority of the ditches within the Ramsar Site and the underpinning SSSIs are also classified as being in unfavourable condition due to excessive phosphorous and the resultant ecological response.

Mirroring conclusions reached by Natural England in relation to development, it is unlikely that the management plan either alone or in-combination, will have a ‘likely significant effect’ on the internationally important bird communities for which the SPA site is designated and it is screened out of this assessment. However, given that parts of the Blackdown Hills National Landscape are within the Nutrient Neutrality Catchment for the Ramsar site, that site has been included in this assessment.

Figure 2 shows the three European sites included in this HRA.

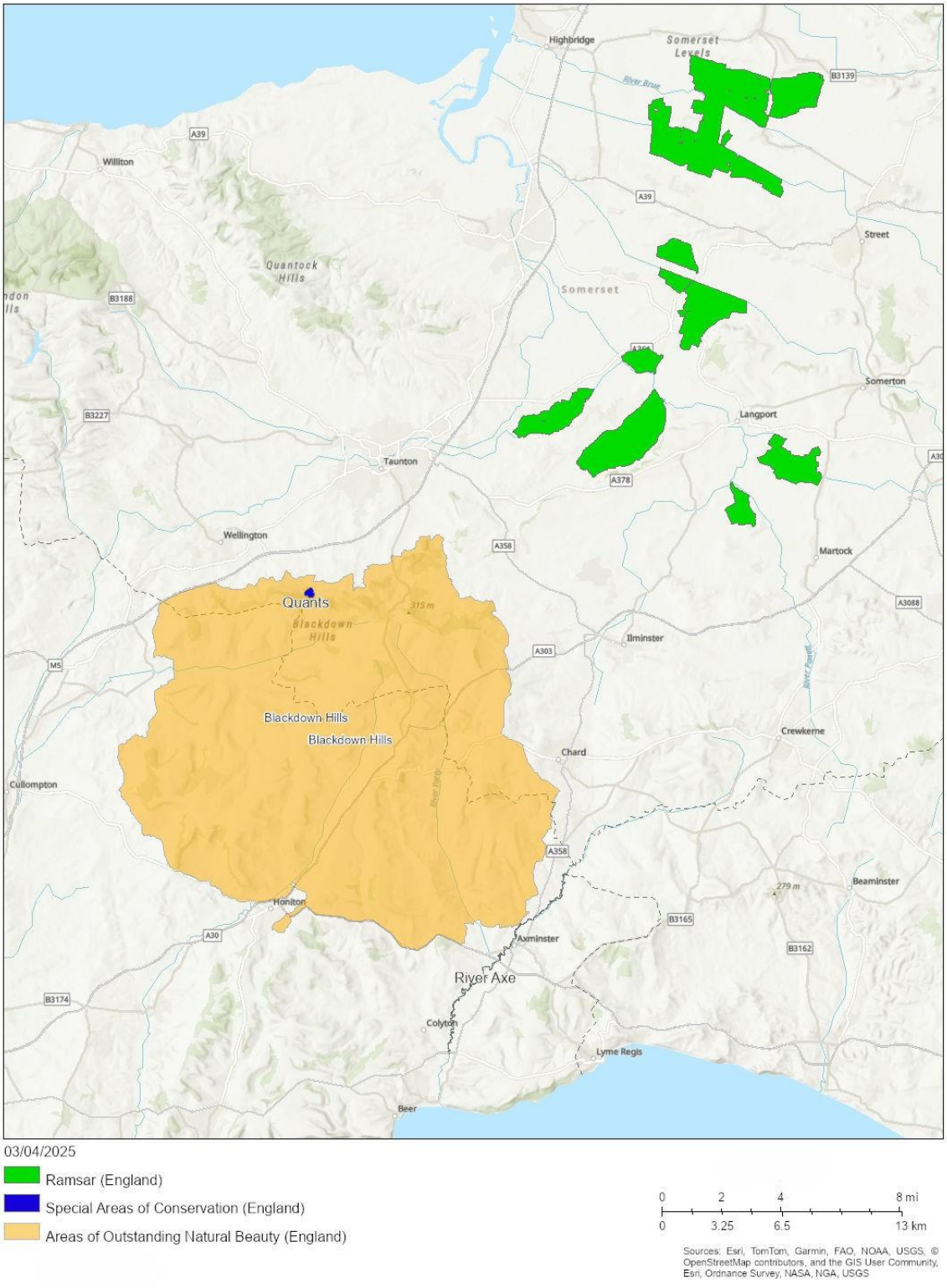

Figure 2 European Sites within and close to the Blackdown Hills National Landscape

Site descriptions are set out in Appendix 1. This includes the qualifying features, conservation objectives and requirements to maintain the favourable conservation status of the European sites.

Table 1 summarises the conditions necessary to maintain site integrity taking into account the qualifying features and conservation objectives.

Table 1 – Principal requirements to maintain site integrity

European Sites	Summary of Requirement
Quants	Maintenance of specialist intensive habitat management for the marsh fritillary butterfly, restore population connectivity.
River Axe	Protection of the water course from raised nutrient levels, most likely deriving from surrounding land uses and land management.
Somerset Levels and Moors	Protection of the site from raised nutrient levels, deriving from surrounding land uses and land management.

3 Blackdown Hills National Landscape Management Plan 2025-2030

Section 82 of the Countryside and Rights of Way (CRoW) Act 2000 establishes the primary purpose of AONB (now known as National Landscapes) designation as the conservation and enhancement of natural beauty. Section 85 of the CRoW Act, as amended by the Levelling Up and Regeneration Action 2023, places a duty on all public bodies to 'seek to further' the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. Under Section 89, the relevant local authorities must prepare and publish a Management Plan for each AONB; and keep it under review. The Management Plan is a statutory document, which provides a policy framework to focus partnership action and priorities for the AONB designation. It also guides and informs all other plans and activities that may affect the AONB so that they can contribute to the continued conservation and enhancement of the area.

The reviewed Management Plan continues on from the previous Management Plans with updating and refinement, and a particular focus on nature recovery and addressing the climate emergency.

A 25 Year Vision for the Blackdown Hills National Landscape has evolved from previous visions statements, which sets the ambition for the plan (draft version):

Our vision is that in 2050, as a result of collaboration and positive change, the Blackdown Hills will be a rich and vibrant landscape, resilient to the effects of climate change, 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, energy, 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.

In order to implement and deliver the vision, a set of objectives, guiding principles, targets and policies are set out in the Management Plan under the themes of Place, People, Nature, and Climate, and are summarised below.

Key Themes

1. **Place**

- **Objectives**: Restore natural capital, support sustainable farming, and enhance landscape character.
- **Targets**: Increase nature-friendly farming and tree cover.
- **Policies**: Soil conservation, flood management, and sustainable development.

2. **People**
   - **Objectives**: Flourishing communities, diverse economy, and accessible countryside.
   - **Targets**: Improve accessibility and engagement.
   - **Policies**: Support local markets, sustainable tourism, and transport.
3. **Nature**
   - **Objectives**: Enhance and connect habitats for resilient ecosystems.
   - **Targets**: Restore wildlife-rich habitats and improve SSSI conditions.
   - **Policies**: Prioritise habitat restoration and species conservation.
4. **Climate**
   - **Objectives**: Reduce emissions, increase carbon sequestration, and promote nature-based solutions.
   - **Targets**: Achieve net zero emissions by 2050.
   - **Policies**: Support appropriate renewable energy, sustainable farming, and energy efficiency.

3.1 Screening of policies to identify Likely Significant Effects

Draft management plan ***objectives*** and ***policies*** were assessed to identify any likely significant effects on one or more European sites. These are assessed because these are the core aspects of the management framework that set out what we want to achieve and what needs to be done by way of management to achieve the objectives.

During this assessment, reference was made to the European sites' vulnerabilities, requirements to maintain favourable condition, and activities considered to be damaging or likely to lead to deterioration of the site. If a policy set the framework for any of these activities to occur then a potential effect was recorded. Broad categories of impacts and potentially damaging activities are set out in Table 2 below.

Table 1 Broad impacts and examples of possible contributing activities

Category of Impact	**Examples of activity (on and off site) which may cause this impact**
Physical loss	Land claim for development - fragmentation and isolation of habitats and populations Changes in channel morphology – canalising, weirs, dams or erosion from alterations to natural processes Construction of artificial features, e.g. wind turbines, electricity transmission structures etc. Changes in land management e.g. cultivation, ploughing, felling, afforestation, deforestation etc

Physical damage/ deterioration	Recreation - trampling, erosion, direct disturbance of species Changes in land management – grazing, cutting, burning regimes etc leading to changes in species and community composition Mineral extraction Selective removal of species e.g. scrub removal Changes in hydrological regime – changes in water abstraction for domestic, agricultural or industrial use Changes channel morphology
Non-physical disturbance	Recreation – visual presence leading to disturbance of species (e.g. boat activity, walking etc.) Noise – disturbance of species Lighting – disturbance to diurnal rhythms
Toxic contamination	Changes in land management – application of pesticides, fertilizers etc. Increases in emissions to water, land or air e.g. from transport, domestic, commercial or industrial sources
Non-toxic contamination	Changes in land management - addition of manure, slurry etc. nutrient enrichment and sediment from run-off Waste Water Treatment Works outfalls – nutrient enrichment
Biological disturbance	Changes in management regime, or cessation of management – grazing, cutting, burning Non-native species introduction or translocation Selective removal of species e.g. exploitation from recreational fishing Stocking with non-native and native species e.g. fish farming, recreational fishing, deer farming Introducing barriers to movement or dispersal e.g. weirs, dams, areas of poor water quality (can create a barrier to migration preventing River and Sea lampreys from reaching their spawning grounds), woodland belts, development (roads, buildings etc)

Source: Compiled from Site Vulnerabilities, Favourable Condition Tables, and Operations Likely to Damage from Component SSSI information for the relevant Habitats sites.

Policies and objectives were screened using the 9-point scoring system as outlined in Table 3 overleaf (adapted from David Tyldesley & Associates advice for Natural England 2006, and used in previous assessments).

For each objective and policy in turn, a score was assigned to each European site according to interpretation of the likely effects as set out in the ‘Reasoning’ column. The assessment takes account of the conservation objectives of each European site and the conditions required to maintain site integrity.

Table 3 System for interpretation of likely effects of objectives and policies

Effect		Reasoning
None	**0**	The policy relates to activities which are not likely to have an effect on the Natura 2000 site by virtue of their specificity, scale, or distance from the site.
No likely (negative) effect	**1**	The policy is specifically intended to conserve and enhance biodiversity, and measures under this policy will not be likely to lead to negative effects on the Natura 2000 site.
	2	The policy is intended to conserve and enhance the natural, geological, built or historic environment and measures under this policy will not be likely to lead to negative effects on the Natura 2000 site.
	3	The policy is not likely to lead to activities which are likely to have a negative effect on the Natura 2000 site.
	4	The policy addresses activities which have the potential to affect the Natura 2000 site, but the policy itself is worded so as not to encourage activities or allow projects which would be likely to cause negative effects on the Natura 2000 site.
Potential for a negative effect	**5**	The policy addresses activities which have the potential to affect the Natura 2000 site, the effects of which may or may not be significant. But the policy itself could be reworded if necessary, so as not to support or encourage activities which would be likely to cause significant effects on the Natura 2000 site.
Potential for a negative effect / effects uncertain	**6**	The policy encourages activities which have the potential to affect the Natura 2000 site, but the likelihood and risk of significance of effects depends on the location, scale or design (& etc.) of individual schemes or projects. It is therefore more appropriate to screen individual schemes or projects as these come forward.
	7	The policy encourages activities in an area which have the potential to affect the Natura 2000 site, either directly or indirectly. Activities under this policy must be subject to assessment to establish, in the light of the site's conservation objectives, whether it can be objectively concluded that there would not be significant effects on the Natura 2000 site.
Likely Significant Effect	**8**	This policy makes provision for activities likely to have significant effects on the Natura 2000 site. Activities under this policy must be subject to appropriate assessment to establish, in the light of the site's conservation objectives, whether it can be objectively concluded that the activities would not have significant effects on the Natura 2000 site.

The screening results are shown in Table 4 and 5 below. Scores are colour coded according to the scheme in Table 3.

Table 4 Assessment of effects of Objectives on European Sites

Theme	Objective	Site		
		Quants SAC	River Axe SAC	Somerset Levels and Moors Ramsar
Place	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.	2	2	2
	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	2	2	2
	To strengthen the Blackdown Hills special sense of place, with a diversity of landscape patterns and pictures, unique geology, archaeology and buildings of architectural appeal, through sound custodianship	2	2	2
People	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	3	3	3

Theme	Objective	Site		
	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.	3	3	3
	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.	5	3	3
	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.	0	0	0
Nature	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.	1	1	1
Climate	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.	2	2	2

Theme	Objective	Site		
	To promote and deliver nature-based solutions to climate change.	3	3	3
	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.	4	4	4

Table 5 Assessment of effects of Policies on European Sites

Theme	**Policy**	**Site**		
		Quants SAC	River Axe SAC	Somerset Levels & Moors SPA/ Ramsar
Place	**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.	2	2	2
	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.	2	2	2

Theme	Policy	Site		
	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.	3	4	4
	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.	1	1	1
	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.	2	2	2
	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.	2	2	2
	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.	2	2	2
	PL8 Encourage sensitive management of field boundaries and hedgerow trees, woodlands, orchards and ponds, protect ancient woodland and veteran trees, and restore the original broadleaved	1	1	1

Theme	Policy	Site		
	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.	2	2	2
	PL10 Monitor, manage and mitigate damaging diseases such as ash dieback that have potential to impact negatively on landscape and biodiversity.	3	3	3
	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.	3	3	3
	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.	2	2	2
	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.	2	2	2
	PL14 Promote awareness and understanding of the geology and geomorphology of the Blackdown Hills and secure effective	2	2	2

Theme	Policy	Site		
	management of important features and sites.			
	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. Ensure that conserving and enhancing landscape and scenic beauty is given great weight.	3	3	3
	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. Seeking to protect and enhance natural features and biodiversity.	4	4	4
	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.	2	2	2
	PL18 The character of skylines and open views into, within and out of the National Landscape will be protected and enhanced.	2	2	2
	PL19 The deeply rural character of much of the land adjoining the National Landscape boundary forms	2	2	2

Theme	Policy	Site		
	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.	4	4	4
	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.	2	2	2
People	PE1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of opportunities for volunteering and 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.	5	5	3
	PE2 Take a coordinated, strategic approach to the management of public rights of way and publicly accessible land to achieve an	4	4	3

Theme	Policy	Site		
	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 and historic 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.	5	5	3
	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	2	2	2
	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	4	4	4
	PE6 Economic capacity, employment and skills in the area will be supported through training opportunities, community enterprise, business networking and cooperation especially where these	4	4	4

Theme	Policy	Site		
	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.	4	4	4
	PE8 Support efforts to secure and improve fast and reliable broadband and mobile phone coverage without adversely affecting special qualities	4	4	0
	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	2	2	2
	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	2	2	2
Nature	N1 Use the Lawton *making space for nature* principles of 'better, bigger, more and joined' to create networks that are fit for purpose for nature to thrive in and adapt to climate change.	1	1	1
	N2 The mantra of 'right tree, right place' should be extended to 'right habitat/species, right place'. This should ensure that scarce and	1	1	1

Theme	Policy	Site		
	irreplaceable habitats are protected and that the development of one habitat does not damage the network of another.			
	N3 Species of conservation concern will be conserved. Targeted action will be taken to support the recovery of champion/priority/indicator species.	1	1	1
	N4 All public bodies within the Blackdown Hills National Landscape 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.	1	1	1
	N5 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.	1	1	1
	N6 Increased recreational pressure will be resisted at locations where unacceptable damage or disturbance to vulnerable habitats or species is likely to arise.	1	1	1
Climate	C1 To transition to net zero, support communities, businesses 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.	3	3	3
	C2 Use less energy to reduce the amount of new energy infrastructure required to meet net zero.	3	3	3
	C3 Transition to renewables; energy used within the area needs to rise to	4	4	4

Theme	Policy	Site		
	near 100% renewable by 2050. The transition to low carbon and renewable energy should be undertaken in a way that seeks to further the conservation and enhancement of the natural beauty of the Blackdown Hills National Landscape, and is compatible with its special qualities, landscape character and heritage value.			
	C4 Reduce Greenhouse Gas (GHG) emissions through encouraging sustainable farming practices and maximise carbon storage in the environment by encouraging interventions such as tree planting and peaty soil restoration.	2	2	2
	C5 Develop demand for sustainably produced food.	3	3	3
	C6 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.	3	3	3
	C7 Reduce emissions from unavoidable biodegradable waste and wastewater treatment.	4	4	4
	C8 Develop and encourage measures which reduce energy usage in existing buildings and improve energy efficiency for all buildings using low carbon technology in all refurbishment, regeneration and improvement schemes. As part of the transition, new buildings need to be net zero as soon as possible.	3	3	3
	C9 Reduce the need to travel and support the development of sustainable low carbon transport and active travel options, while	3	3	3

Theme	Policy	Site		
	working to avoid leaving any community isolated.			

4 Fuller Considerations

The majority of the draft objectives and policies were assessed as not requiring more in-depth consideration as they are either beneficial or are not likely to lead to negative effects on the European sites.

For some policies (see Table 6) the potential for them to lead to activities that could have significant impacts on sites could not be obviously ruled out (applying the precautionary principle). These policies were therefore taken forward for fuller consideration of whether these effects are likely to be *significant*.

Table 6 Objectives and Policies to be taken forward for fuller consideration

Objective/Policy	Reason	European Sites
Objective: 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.	5	Quants SAC, River Axe SAC
Policy PE1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of opportunities for volunteering and 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.	5	Quants SAC, River Axe SAC
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.	5	Quants SAC, River Axe SAC

Assessing 'significance'

In terms of European sites a 'significant' effect is one that is not inconsequential and which is likely to undermine the achievement of the site's conservation objectives.

Examples of the types of effects, which are considered likely to be significant, include:

1 Causing change to the coherence of the site or to the designation series (e.g. presenting a barrier between isolated fragments, or reducing the ability of the site to act as a source of new colonisers);
2 Causing reduction in the area of habitat or of the site;
3 Causing direct or indirect change to the physical quality of the environment (including the hydrology) or habitat within the site;
4 Causing ongoing disturbance to species or habitats for which the site is notified;
5 Altering community structure (species composition);
6 Causing direct or indirect damage to the size, characteristics or reproductive ability of populations on the site;
7 Altering the vulnerability of populations etc. to other impacts;
8 Causing a reduction in the resilience of the feature against external change (for example its ability to respond to extremes of environmental conditions);
9 Affecting restoration of a feature where this is a conservation objective;
10 Interfering with key relationships that define the structure of the site;
11 Interfering with key relationships that define the function of the site.

It must be acknowledged that this list is not exhaustive, it is only indicative.

Judgements on the 'significance' of impacts was based upon the likely effect on qualifying features of each particular site as well as the probability, duration, frequency and reversibility of those impacts. The risk of these impacts occurring was also considered.

Considerations and Recommendations

These considerations evaluate the risk or likelihood of the identified potential effects being *significant.*

Where effects were identified as potentially likely to be significant, policy changes were suggested to reduce or obviate the risk of any of these effects occurring, and prevent the need to progress to appropriate assessment. Consideration was also given to the availability of other mechanisms that in combination with the plan, would obviate or reduce the risk or likelihood of the effect being significant.

The tables below record the further considerations of individual objectives and policies listed in Table 6. Fuller consideration of polices and the type and significance of impacts was informed by professional judgement and the baseline data review. The final row of each table states the 'significance conclusion' for the policy, based on the recommendations here being incorporated into the final Blackdown Hills National Landscape Management Plan.

Objective	**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.**
River Axe SAC	

Potential for indirect impacts from erosion if access and recreational activities are encouraged and are not sensitive. Increased erosion within the catchment could lead to increased sediment volumes in run-off, leading to elevated levels of suspended solids. This can clog the respiratory structures of the bullhead and lamprey fish species for which the site is of European importance. In addition, siltation of riverine sediments, caused by increased particulates, could prevent the successful establishment of *Ranunculus* plants, and interfere with egg and fry survival in lampreys and bullhead, and is considered a major threat. Whilst the impacts from a single access opportunity are thought unlikely to be significant, there may be cumulative impacts across the tributaries which could lead to a significant effect unless improvements / opportunities and use are sensitive.

Quants SAC

The Quants SAC is part of a site actively managed by Somerset Wildlife Trust. Any potential for increased disturbance, physical damage from erosion as a result of changes to access would be carefully managed and monitored by Somerset Wildlife Trust as an integral part of the site's Management Plan and therefore significant effects from this objective are unlikely.

Recommendations:

Reword the Objective 'To ensure that appropriate opportunities to explore and enjoy the Blackdown Hills countryside and its special qualities that are compatible with conserving and enhancing natural beauty are available to all and that everyone feels welcome.'

Conclusion:

With only 'sensitive' access being encouraged within the National Landscape, significant effects from the implementation of this objective are unlikely to occur.

No Likely Significant Effects – If recommendations are implemented.

Policy PE1	**Seek to inspire and foster connection with the Blackdown Hills through provision of a range of opportunities for volunteering and 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.**

This policy is primarily concerned with *promoting* the Blackdown Hills countryside as a place for volunteering and active engagement for all. Some areas of the countryside and aspects of wildlife and heritage are more appropriate than others, and this policy should take this into account.

Recommendations:

Reword the policy: 'Seek to inspire and foster connection with the Blackdown Hills through provision of a range of sensitive and sustainable opportunities for volunteering and 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.'

Delivery implementation should consider the impacts on sensitive sites, particularly European sites, from the activities that are promoted.

Conclusion:

With the recommendations implemented this policy and its delivery actions (if in line with the policy) are unlikely to have significant impacts on the European sites.

No Likely Significant Effects – If recommendations are implemented.

Policy 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.**

This policy is primarily concerned with *promoting* the health and wellbeing benefits offered by the natural environment of the Blackdown Hills. Although the policy refers to the possibility of enhancing landscape, biodiversity, heritage and access, it is silent on conserving natural beauty. Some areas of the countryside, such as designated sites, are less appropriate than others, and this policy should take this into account.

Recommendations:

Reword the policy: 'Opportunities to use the natural environment resource of the Blackdown Hills to benefit the health and well-being of residents and visitors which are compatible with conserving and enhancing natural beauty will be sought and promoted, particularly where this will enhance landscape, biodiversity, heritage and access.'

Delivery implementation should consider the impacts on sensitive sites, particularly European sites, from the activities that are promoted.

Conclusion:

With the recommendations implemented this policy and its delivery actions (if in line with the policy) are unlikely to have significant impacts on the European sites.

No Likely Significant Effects – If recommendations are implemented.

Summary of conclusions on the likelihood of significant effects

The screening process confirms that the large majority of objectives and policies as currently worded, are considered to have No Likely Significant Effects on the identified European sites.

Three were identified in the Preliminary Screening for which the *potential* for negative effects could not be obviously ruled out (applying the precautionary principle) within the framework of their current wording. These two policies and one objective all related to access and enjoyment.

During fuller considerations, recommendations were made for rewording **all** of these policies to obviate the need for progressing them to appropriate assessment. With the recommendations implemented, there are unlikely to be any significant effects from these policies.

There are no significant changes to the plan's objectives and policies, or the overall intent, arising from the consultation period. Policy PE3 above has been amended by the inclusion of 'historic environment' as well as 'natural environment', however this is not considered to affect any earlier conclusions.

Overall Significant Effect Conclusion

The National Landscape Management Plan should be considered in its entirety and necessarily within the context of the statutory purpose of AONB designation, '*to conserve and enhance natural beauty*.' As such, the purpose of all policies, and Delivery Plan actions under those policies, is to actively and positively contribute to conserving and enhancing the area's natural beauty. Included within the definition of 'conserving and enhancing natural beauty' is the conservation of '*flora, fauna and physiographical features'* and as such encompasses the reasons for designation of European protected sites, that is to conserve flora and fauna.

The statutory purpose *to conserve and enhance natural beauty*, inherently necessitates the delivery of actions in such a way as not to compromise or prejudice the achievement of the conservation objectives of European protected sites.

When policies are interpreted within the overall framework of the Management Plan and the intention of the policies (to expand on the statutory purpose), this provides sufficient safeguards and there is a negligible risk that any adverse effects would be permitted to occur.

It is therefore concluded that the *Blackdown Hills National Landscape Management Plan 2025-2030* when taken in its entirety, should have **No Likely Significant Effects** on the identified European sites, provided **all** the recommendations here are acted upon and relevant legislative provisions are adhered to in the delivery.

5 Other plans and programmes

As part of the HRA screening process, it is also necessary to consider whether the proposed plan might have any significant adverse effects 'In combination' with other plans. 'In combination' refers to the cumulative effect of influences acting on sites from other relevant plans and projects in the context of prevailing environmental conditions. The purpose of the National Landscape Management Plan is to set out the policy of the relevant local authorities towards the National Landscape. Policies are purposefully protective towards the environment in line with conserving and enhancing natural beauty and will have varying degrees of influence on the way in which local authorities, and others, carry out their duties and functions in general and under other plans.

However, given that screening of the plan itself concludes that the plan will not have significant effects on one or more European sites then it is not deemed necessary to undertake an in-combination analysis. This is based on Natural England's advice and guidance on previous rounds of Management Plans (*It is Natural England's view that if the Management plan does not have a significant environmental effect then it is not necessary to carry out an in combination assessment* and that '...*if no LSE* [Likely Significant Effects] *then no in combination effects are possible*'.

6 Conclusion

This Habitat Regulations Assessment Screening has considered the objectives and policies in the draft *Blackdown Hills National Landscape Management Plan 2025-2030* for their potential effects on the two SAC European sites inside or very close to the National Landscape and the Somerset Levels and Moors Ramsar site.

Provided the recommendations set out in this report are acted upon it can be concluded that the *Blackdown Hills National Landscape Management Plan 2025-2030* when taken in its entirety, should have **No Likely Significant Effects** on the identified European sites. Therefore it is not necessary to proceed to full Appropriate Assessment.

The HRA screening considered the strategic nature of the Plan and it is noted that the need for further HRA may need to be considered again as specific projects or delivery plan action are developed.

7 References

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https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK11064&SiteName=levels&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9010031&SiteName=levels&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030242&SiteName=quants&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=

Appendix 1

Qualifying Features, Conservation Objectives and Vulnerabilities of European Sites Within or Close to Blackdown Hills National Landscape

Quants SAC

Area: 20.29 Ha

Annex II species that are a primary reason for selection of this site

1065 Marsh fritillary butterfly ***Euphydryas (Eurodryas, Hypodryas) aurinia*** This damp and sheltered site supports a medium-sized but strong **marsh fritillary** ***Euphydryas aurinia*** population in a neutral grassland/fen mosaic. It is strategically placed close to other smaller sub-populations, with which it forms a metapopulation, and may exchange individuals with the large population at Southey Moor (outside the SAC series).

[The Site Improvement Plan highlights that despite suitable habitat conditions Marsh fritillary butterfly is not currently present on site. The nearest known population is adjacent to Southey & Gotleigh SSSI which is 6km away]

Conservation Objectives

With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);
Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.
Subject to natural change, to maintain or restore:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- The populations of qualifying species;
- The distribution of qualifying species within the site.

Qualifying Features

S1065*. Euphydryas (Eurodryas, Hypodryas) aurinia*; marsh fritillary butterfly

Vulnerability[1]

The marsh fritillary population here was restricted to a comparatively small area (c. 2 ha) and is kept high by a considerable level of management directed at producing 'ideal' habitat in this area. If the highly interventionist nature of management is disrupted or discontinued the population may drop.

[1] Please note: vulnerability accounts are extracts from original Standard Data Forms submitted by JNCC to the European Commission on designation of the European Sites in the period 1995 to 2001; some references are no longer current.

River Axe SAC

Area: 25.78Ha

Annex I habitats that are a primary reason for selection of this site

3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation

The Axe is a south-western example of sub-type 2. Only the lower reaches of the main river have been designated, where the mixed catchment geology of sandstones and limestones gives rise to calcareous waters where *R. penicillatus* ssp. *pseudofluitans* dominates, giving way to *R. fluitans* further downstream. Short-leaved water-starwort *Callitriche truncata* is an unusual addition to the *Ranunculus* community and gives additional interest.

Annex II species present as a qualifying feature, but not a primary reason for site selection

1095 Sea lamprey *Petromyzon marinus* 1096 Brook lamprey *Lampetra planeri* 1163 Bullhead *Cottus gobio*

Conservation Objectives

With regard to the natural habitats and/or species for which the site has been designated ("the Qualifying Features" listed below);
Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.
Subject to natural change, to maintain or restore:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- The populations of qualifying species;
- The distribution of qualifying species within the site.

Qualifying Features

H3260. Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation; Rivers with floating vegetation often dominated by watercrowfoot
S1095*. Petromyzon marinus*; sea lamprey
S1096*. Lampetra planeri*; brook lamprey
S1163*. Cottus gobio*; bullhead

Vulnerability

The main threat on this site is the potential nitrification from surrounding land-use. A programme of surveys has been undertaken investigating the sources of potential

problems. On completion, management advice will be provided to the perpetrators to minimise impacts.

Somerset Levels and Moors Ramsar Site

Area: 6,395 ha

The Ramsar site is designated for its internationally important wetland features including floristic and invertebrate diversity and consists of a series of Sites of Special Scientific Interest within the largest area of lowland wet grassland and associated wetland habitat remaining in Britain. It consists of areas in the flood plains of the Rivers Axe, Brue, Parrett, Tone and their tributaries. The site attracts internationally important numbers of wildfowl in winter and is one of the most important sites in southern Britain for breeding. The network of rhynes and ditches support an outstanding assemblage of aquatic invertebrates, particularly beetles.

Qualifying Features of the European Site

Ramsar criteria 2 - A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities.
Supports 17 species of Red Data Book invertebrates. The vascular plants *Wolffia arrhiza, Hydrocharis morsus-ranae* and *Peucedanum palustre* are considered vulnerable by the GB Red Book.

Ramsar criteria 5 - A wetland should be considered internationally important if it regularly supports 20,000 or more waterbirds.
Species with peak counts in winter: 97,155 waterfowl (5 year peak mean 1998/99-2002/2003)

Ramsar criteria 6 - A wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.
Qualifying Species/populations (as identified at designation) -
Species with peak counts in winter:
Tundra swan , *Cygnus columbianus bewickii*
Eurasian teal, *Anas crecca*
Northern lapwing, *Vanellus vanellus*

Species/populations identified subsequent to designation for possible future consideration under criterion 6 -
Species with peak counts in winter:
Eurasian wigeon, *Anas penelope*,
Mute swan, *Cygnus olor*,
Northern pintail, *Anas acuta*,
Northern shoveler, *Anas clypeata*,

European Site Conservation Objectives

Site specific conservation objectives for Ramsar sites have not been published. However, the following generic Conservation Objectives for all Ramsar sites have previously been signed off by Natural England:
With regard to the Ramsar Site and the wetland habitats, individual species and/or groups of species for which the site has been listed (its 'Qualifying Features'), and subject to natural change;

Ensure that the integrity of the [Ramsar] site is maintained or restored as appropriate, and ensure that the site contributes to achieving the wise use of wetlands across the UK, by maintaining or restoring:
• The extent and distribution of qualifying habitats and habitats of qualifying species
• The structure and function of qualifying habitats and habitats of qualifying species
• The supporting processes on which qualifying habitats and habitats of qualifying species rely
• The populations of each qualifying species, and,
• The distribution of each qualifying species within the site'.

Vulnerability of the European Site
The vast majority of the ditches within the Ramsar Site and the underpinning SSSI's are classified as being in unfavourable condition, or at risk, from the effects of eutrophication caused by excessive phosphorous.
Aquatic invertebrate assemblage
The designated invertebrate assemblage is sensitive to changes in water quality. Water beetles and large mouthed valve snails associated with the Ramsar are particularly dependent on the maintenance of water quality. The interest features of the Ramsar are in unfavourable condition, or at risk, due to the effects of eutrophication caused by excessive phosphates.
Migratory/wintering birds
The availability of an abundant food supply is critically important for adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which could affect the distribution, abundance and availability of prey and hence adversely affect species' populations.
The nature, scale, timing and duration of some human activities can result in the disturbance of birds at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. This includes increased recreational pressure.

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Impact Assessment

Assessment of: Devon County Council's endorsement of the review of Blackdown Hills National Landscape Management Plan

Service: Climate Change, Environment and Transport

Head of Service: Meg Booth

Version / date of sign off by Head of Service:

Assessment carried out by (job title): Kate Hind, Environment Partnership Officer, with Lisa Turner, Blackdown Hills National Landscape Planning Officer

1. Description of project / service / activity / policy under review

Devon is home to five National Landscapes, formerly known as Areas of Outstanding Natural Beauty (AONBs). Each landscape has a partnership responsible for overseeing its management. The 'Blackdown Hills Management Plan' is a statutory document created and reviewed every five years by the partnership, which straddles the Devon and Somerset border.

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.

2. Reason for change / review

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 managing 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. Aims / objectives, limitations and options going forwards (summary)

See Section 1.

4. People affected and their diversity profile

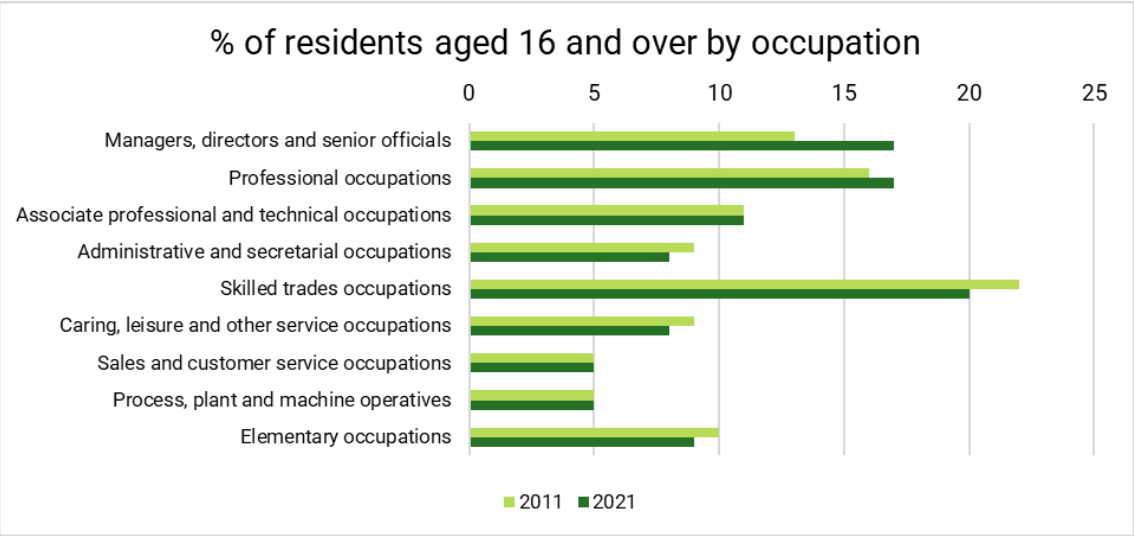
- Population: 14,130 residents within the National Landscape, with around 150,000 living in the nearby towns around the periphery.
- Age: Based on the 2021 Census, 19% of resident population is age 19 and under, 21% are age 20-44, 31% are between 45 and 64 and 29% are 65 years of age and older. The largest cohort is those aged between 50 and 64. The population profile has remained stable since the 2011 Census but with a small increase in the proportion of residents over the age of 75, from 10% to 13%.

- Ethnic group: The numbers of people within the National Landscape whose ethnicity is other than White British is low:
  Proportion of the population within each ethnic group in Blackdown Hills National Landscape:
- Asian, Asian British or Asian Welsh: <1%
- Black, Black British, Black Welsh, Caribbean, or African: <1%
- Mixed / Multiple ethnic groups: 1%
- White: 98%
- Other ethnic groups: <1%

- Deprivation spread: Official figures show there is limited deprivation within the Blackdown Hills, with 33% of the population living in the 5th Decile and 44% in Decile 6. The remainder are in the 7th and 8th Decile.

- Disability: in 2021, 75% of the resident population reported that they suffered no long-term health conditions, 17% considered themselves as disabled under the Equality Act and 8% had a long term physical or mental health condition.

- Employment: The chart below shows occupational profile of resident population, compared to 2011. Skilled trades are the largest sector, but has fallen, whereas managers, directors, senior roles and professionals have increased.
  56% of the adult population is employed, whereas 42% are not seeking work.



3. Stakeholders, their interest and potential impacts

Numerous stakeholders have been involved in the iterative process informing the review of the Plan either through directing the review or taking part in stakeholder feedback, notably local authority partners who are responsible for the plan, other agencies such as Natural England, Historic England, Wildlife Trusts, as well as individuals from the local community and parish councils. The Management Plan is intended to be a shared strategy for the place that will have relevance to stakeholders in the following ways:

- 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 these responsible authorities.
- Blackdown Hills National Landscape Partnership organisations: These varied 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, utility providers) have a duty to seek 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, businesses and visitors: Everyone who lives, works or visits 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 may refer to the plan or use it to gain a greater understanding of the issues affecting the area.

6. Research used to inform this assessment

Different methods of research were used to inform the review of the management plan, and this has been used to inform this assessment:

a. Literature review/other plans and strategies – to help set the scope of the review, national guidance on management plan review was referenced alongside learning best practice from other protected landscapes (National Parks and National Landscapes management plans recently or concurrently undergoing review). Various other plans and strategies were reviewed, such as Devon Carbon Plan, and reference was had to the development of the Devon Local Nature Recovery Strategy for example.

b. Data collection and statistical analysis -

- We commissioned a State of the National Landscape report in 2023, to collate a range of data and information for the Blackdown Hills National Landscape, from Natural England, Defra, 2021 Census and other sources, relating to the topics of the previous management plan
- Working collaboratively with other national landscapes, engagement in research projects provided us with data from Cranfield University on soil carbon
- DEFRA/Natural England provided a set of national statistics to support the targets and outcomes framework/and monitoring

c. Stakeholder engagement and consultation

At different stages of the review we sought direct input and feedback from partners and community. This included an online public survey, a stakeholder workshop with partner organisations, parish councils and other local representatives, and a workshop with local community environmental groups.

7. Description of consultation process and outcomes

Key consultation phases in the review process:

- Blackdown Hills Management Group workshops to scope scale of review
- Public online survey, widely promoted through parish councils, parish magazines, social media and event, to gauge views on natural beauty, and future priorities
- Stakeholder workshop for organisations, to help development vision, principles and priorities.
- Reporting to local authority partners in advance of public consultation and ongoing engagement with officers and councillors
- Six-week consultation period for partners and public on a draft plan (online via website, promoted to stakeholders and public)

Comments, advice and suggestions from agencies and individuals informed the development of the plan and appropriate amendments made at each stage.

8. Equality analysis

Giving Due Regard to Equality and Human Rights

The local authority must consider how people will be affected by the service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations.

Where relevant, we must take into account the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, sexual orientation, race, and religion and belief. This means considering how people with different needs get the different services they require and are not disadvantaged, and facilities are available to them on an equal basis in order to meet their needs;

advancing equality of opportunity by recognising the disadvantages to which protected groups are subject and considering how they can be overcome.

We also need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).
- The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are:
    - Informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations.
    - Proportionate (negative impacts are proportionate to the aims of the policy decision)
    - Fair
    - Necessary
    - Reasonable, and
    - Those affected have been adequately consulted.

Characteristics	Potential or actual issues for this group. [Please refer to the Diversity Guide and See RED]	In what way will you: • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim? Are you complying with the DCC Equality Policy?

All residents (include generic equality provisions)	One of the four sections of the plan is called 'People'. It has objectives, guiding principles, targets, actions and policies. The guidance from Natural England on all National Landscape management plans is to improve the partnership and governance equality and diversity.	The Blackdown Hills National Landscape Management Plan places people at its core, recognising the essential role of residents, visitors, businesses, and landowners in its delivery. The plan is structured around four key themes: Place, People, Nature, and Climate, each with defined objectives, guiding principles, targets, actions, and policies. To help eliminate or reduce potential disadvantage and improve accessibility, the plan aligns with the government's PLTOF target to "Improve and promote accessibility to and engagement with Protected Landscapes for all using metrics based on those in the Defra Access for All programme." It goes further by committing to: • Securing opportunities for physical improvements to accessibility, such as enhanced trails, parking, and facilities. • Ensuring projects incorporate volunteering opportunities and engagement with schools. • Taking positive action to increase diversity within the management group and decision-making processes. By focusing on improving physical accessibility and fostering engagement across different groups, the plan seeks to advance equality of access and participation. While some actions may require prioritisation of resources or changes in land use, these are considered necessary and proportionate to achieving the overall aim of an inclusive and accessible landscape.
Age	See above	See above
Disability (incl. sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people	See above	See above

Characteristics	Potential or actual issues for this group. [Please refer to the Diversity Guide and See RED]	In what way will you: • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim? Are you complying with the DCC Equality Policy?
Culture and ethnicity: nationality/national origin, ethnic origin/race, skin colour, religion and belief	See above	See above
Sex, gender and gender identity (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)	See above	See above
Sexual orientation and marriage/civil partnership	See above	See above

Characteristics	Potential or actual issues for this group. [Please refer to the Diversity Guide and See RED]	In what way will you: • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (to meet needs/ensure access, encourage participation, make adjustments for disabled people, 'close gaps'), if possible. • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim? Are you complying with the DCC Equality Policy?
Other relevant socio-economic factors such as family size/single people/lone parents, income/deprivation, housing, education and skills, literacy, sub-cultures, 'digital exclusion', access to transport options, rural/urban	See above	See above

9. Human rights considerations:

There are no human rights considerations arising from the review of the Blackdown Hills management plan in relation to the Human Rights Act (1998).

In what way can you support and create opportunities for people and communities (of place and interest) to be independent, empowered and resourceful?

The plan provides a focus for partnership working and collaboration among agencies, with a clear geographical emphasis. Part of the plan's Vision statement is to see 'thriving, diverse communities, with a strong sense of place and wellbeing, are sustained by a connection to the land, natural environment and a rich local cultural heritage. Living and working sustainably in and around the area, they underpin the prospering local economy and can access the services they need.' This is backed by objectives and policies that help to provide the framework for supporting and creating such opportunities, for example;

Objective: 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.

Policy 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.

In what way can you help people to be safe, protected from harm, and with good health and wellbeing?

The plan includes a policy that promotes good health and wellbeing insofar as engaging and connecting with nature and the countryside;

Policy PE3: Opportunities to use the natural environment resource of the Blackdown Hills to benefit the health and well-being of residents and visitors which are compatible with conserving and enhancing natural beauty will be sought and promoted, particularly where this will enhance landscape, biodiversity, heritage and access.

In what way can you help people to be connected, and involved in community activities?

In addition to the vision statement, objective and policies described in the sections above, the following policy also contributes to this:

PE1 Seek to inspire and foster connection with the Blackdown Hills through provision of a range of sensitive and sustainable opportunities for volunteering and 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.

10. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 4c, otherwise complete the environmental analysis table):

Devon County Council's Environmental Review Process	
Planning Permission	
Environmental Impact Assessment	
Strategic Environmental Assessment	X

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Reduce, reuse, recycle and compost:		
Conserve and enhance wildlife:		
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:		
Conserve and enhance Devon's cultural and historic heritage:		
Minimise greenhouse gas emissions:		
Minimise pollution (including air, land, water, light and noise):		
Contribute to reducing water consumption:		
Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):		
Other (please state below):		

11. Economic analysis

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Impact on knowledge and skills:		In the management plan there are policies for each section. Please see below the policies relating to knowledge and skills. • The Blackdown Hills National Landscape supports local communities in meeting their needs, promoting sustainable lifestyles, and preserving cultural and natural heritage. • Economic development is encouraged through local markets and sustainable products, provided they do not compromise the area's natural beauty. • Employment, skills, and business growth are supported through training, enterprise initiatives, and networking, particularly when they align with conserving the landscape's special qualities. • Tourism and recreation are welcomed when they benefit the local economy without harming the landscape, biodiversity, or tranquillity. • Additionally, efforts to improve broadband and mobile coverage are supported, ensuring they do not negatively impact the area's character.
Impact on employment levels:		See above
Impact on local business:		See above

12. Describe the linkages or conflicts between social, environmental and economic impacts (Combined Impacts):

The management plan is structured around four key areas—people, place, climate, and nature—recognising their interconnectedness and the ways they can support and challenge each other. It seeks a balanced approach, such as enhancing public access to nature while mitigating potential negative environmental impacts from recreation, including dog fouling, wildlife disturbance, and litter.
Examples of policies in the plan include:

- Support farmers to take up environment land management schemes
- Continue to promote, deliver and advocate for 'mainstreaming' natural-based solutions as a mechanism to provide resilience to property and infrastructure, both within the Blackdown Hills National Landscape but also, importantly, downstream where major critical infrastructure is at risk from flooding and where building resilience is only possible through upstream interventions
- 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
- Transition to renewables; energy used within the area needs to rise to near 100% renewable by 2050. The transition to low carbon and renewable energy should be undertaken in a way that seeks to further the conservation and enhancement of the natural beauty of the Blackdown Hills National Landscape, and is compatible with its special qualities, landscape character and heritage value
- Reduce the need to travel and support the development of sustainable low carbon transport and active travel options, while working to avoid leaving any community isolated

13. How will the economic, social and environmental well-being of the relevant area be improved through what is being proposed? And how, in conducting the process of procurement, might that improvement be secured?

The National Landscape Management Plan enhances the well-being of the area by balancing economic growth, community needs, and environmental conservation.

- Economic: The plan supports sustainable local businesses, tourism, and employment, ensuring economic activity aligns with the conservation of the landscape. It also promotes improved broadband and mobile connectivity to support local enterprise.
- Social: By improving access to nature, supporting community initiatives, and preserving cultural heritage, the plan enhances quality of life, health, and well-being.
- Environmental: Conservation is central to the plan, ensuring biodiversity, natural beauty, and climate resilience are protected. Measures are in place to manage visitor impact, promote sustainable land use, and safeguard the landscape for future generations.

All procurement follows Devon County Council procedures.

14. How will impacts and actions be monitored?

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.

2. 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 team 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.

Blackdown Hills National Landscape Management Plan 2025-2030
Engagement and Consultation Report

1. Key consultation phases in the review process:
   - Blackdown Hills Management Group workshops to scope scale of review and maintain overview of process (2022-2025)
   - Public online survey, widely promoted through parish councils, parish magazines, social media and events, to gauge views on natural beauty, and future priorities (September 2023 to end of January 2024)
   - Stakeholder workshop for organisations, to help development vision, principles and priorities. (February 2024)
   - Reporting to local authority partners in advance of public consultation and ongoing engagement with officers and councillors (summer/autumn 2024)
   - Local authority and management group consultation on draft plan ahead of public consultation (November 2024)
   - Six-week consultation period for partners and public on a draft plan (online via website, promoted to stakeholders and public) (January to March 2025)

2. Record of public consultation (21st January until 4th March 2025; period extended to 19th March for parish councils, and some other partner responses received during this period)

A. Comments received from:

Type	***No.***	***Organisation***
Parish or town council	6	Otterford Parish Council, Culmstock Parish Council, Hemyock Parish Council, Clayhidon Parish Council, Kentisbeare Parish Council, Broadhembury Parish Council
Local authority	4	MDDC(Cllr), DCC Heritage, South West Heritage Trust, Somerset Council (Nov 2024)
Statutory agency	3	Forestry Commission (South West Area Team), Historic England, Natural England
Local resident	6	
Landowner/farmer	1	
Local interest or community group	2	Luppitt Landscape Partnership, Partnership Management Group members (Nov 2024)
Non-government organisation	2	CPRE Somerset, Somerset Wildlife Trust
Other	1	Devon Countryside Access Forum
total responses	**25**	

B. Summary of amendments made to management plan as a result of consultation:

Section	**Amendments**
General	Added section numbering and some sub-headings to aid navigation 'Current status' changed to 'At a glance' Strategic Delivery Plan added to appendices Chair's foreword and partnership commendation statement to be added Full design, maps and images to be included
Introduction	1.1 Added text to emphasise role of plan among partnership organisations. Specified that relevant authorities includes the national landscape partnership. Additional concluding remarks added about aim/purpose of the plan. 1.3 Additional references to strengthened duty. Additional information on the protected landscapes targets. Amended information on the Landscapes Review. In the policy influences section; Added international context (UN sustainable development goals). Added reference to MDDC and EDDC climate action. Added reference to Natural England, Historic England, and the National Lottery Heritage Fund joint statement. Included a new section – summary of forces for change.
Special Qualities	Deletion of one element of a sentence in unspoilt rural character paragraph. Special qualities appendix; Corresponding amendment to the above. Some additional details added to historic landscape. Some further detail added to natural environment section, on turbaries and spring-line mire.
Vision	Minor wording change to thriving, diverse communities… part. Additional descriptive wording to wildlife and habitats part. Revised heritage part.
Place	Changed/added 'regenerative' alongside 'sustainable'. Added archaeology to relevant objective. Additional principle added about national targets/local needs. Commentary added about take up of agri-environment schemes under priorities for action. Included priority for Target 10 (heritage). Added two 'other priorities', one related to heritage, the other to planning. Added forestry-related references to relevant policies.

	Context; Additional commentary in respect of water quality. Added paragraph on air quality. Organised landscape section more logically, with sub-headings. Combined heritage and geology and some additional heritage commentary. Farming and land use heading changed to farming and land management. Soil health bullet points revised. Added references to UK Forestry Standard, and some other text amendments. 'A spotlight on planning' heading changed to Planning and development. Key points from the NPPF reformatted. Added cross reference to Climate section and policies. Added specific quote from NPPF footnote regarding 'major development'. Additional text added under role of the management plan. Added reference to noise/activity/lighting applying beyond the boundary.
People	Amended wording of access/enjoyment objective. Re-ordered and combined guiding principles. Added detail of lengths of rights of way. Additional priority included for Target 9. Two additional 'other priorities', communication/information audit, and collaboration to address community issues. Policies PE1 and PE3 amended to (activities compatible with conserving and enhancing) and added historic to natural environment. Context; Added commentary on health and wellbeing organisations and experience. Specified Culm garden village alongside surrounding towns in terms of green infrastructure/access. Expanded local access forum commentary, and included reference to Parish Paths Partnership (P3) groups in Devon.
Nature	Reference to habitat creation targets added under priorities for action for 30 by 30. Context; Included reference to marsh fritillary not being present on SAC site. Added reference to Somerset Levels and Moors.
Climate	Added clarification about cross-cutting nature of the climate theme at the start. Under actions for climate change mitigation, added new action around quantifying peat deposits and carbon contained. Under actions for adaptation, added point about renewable energy installations and AD plants. Policies;

	Added general point - clarification about cross referencing other themes. Context; Added reference to renewable energy development and signposting to Devon landscape guidance on accommodating wind and solar.
Delivery and monitoring	Added sub-heading of implementation. Added section about functions and role of National Landscape Partnership in delivery. Additional contextual information added as introduction to monitoring and evaluation. Note added about using local intelligence to question national targets and outcomes. Updated references to the delivery plan (and new delivery plan included in appendices).

All comments submitted have been recorded on a spreadsheet, with a note on response/course of action.

Report for:	**CABINET**
Date of Meeting:	8 July 2025
Subject:	**VALUE FOR MONEY AND BEST PRACTICE IN MID DEVON HOUSING MODULAR SOCIAL HOUSING DELIVERY**
Cabinet Member:	Councillor Jane Lock, Cabinet Member for Housing, Assets and Property
Responsible Officer:	Simon Newcombe, Head of Housing and Health
Exempt:	None
Wards Affected:	All wards
Enclosures:	Annex A: Zed Pods standards Annex B: Value for Money benchmarking Annex C: Awards Annex D: Draft Social Value Impact Economic Appraisal Report St Andrews House, Cullompton

Section 1 – Summary and Recommendation(s)

This report provides the PDG with the strategic and policy context supporting the delivery of modular (modern methods of construction, MMC) social housing in the Mid Devon Housing (MDH) Housing Revenue Account (HRA) development programme.

It further provides information and assurance in respect of the value for money and relative benchmarking with more traditional build schemes alongside the standards and best practice associated with our modular MMC approach. The report also sets out the wider context and benefits of the programme with regard to regeneration, net-zero carbon, added or social value and tenancy sustainment.

Recommendation(s):

1. **That Cabinet continues to adopt an HRA development programme with a focus on delivering MMC, modular net-zero social housing where**

possible and viable as part of the Council's future Housing Strategy as recommended by the Homes Policy Development Group.

Section 2 – Report

1 Introduction

Strategic context

1.1 In response to a national acute housing crisis, in July 2024 all councils in England were given new, mandatory housing targets aimed at providing 1.5 million new homes. Within this, the government has pledged the biggest boost to affordable, social, and council housing for a generation.

1.2 One the principle mechanisms to address the shortage of affordable housing specifically is the Affordable Homes Programme under Homes England. The government recently announced a new, larger, £11.5bn Affordable Homes Programme 2021-26 (AHP), including funding for social rent, supported housing, and a renewed commitment to delivering homes using modern methods of construction (MMC).

1.3 In March, the government announced £2bn in grant funding as a "down payment" on a future AHP to support the delivery of new social and affordable homes.

So far, we know that Homes England have indicated that this funding:

- Will be delivered on the same terms as the current Affordable Homes Programme including a commitment to MMC
- Will be prioritised for homes for social rent.

Local context

1.4 In July 2024, Lord Best reported on the Devon Housing Commission setting out a real housing crisis in this county, emphasising an acute shortage of homes affordable for the next generation. In a series of recommendations aimed at central government, strategic Devon partners and at local district level, in the context of new affordable housing there is a focus on:

- Commitment to the ongoing AHP with a focus on social rented homes;
- Opportunities for a Devon Housing Strategy and greater regional coordination;
- Increased delivery of social rented housing at type and location of need;
- Strengthened support for the Devon Carbon Plan; and
- Increased focus on rural exception sites

1.5 The Council have led many aspects of a local response to this housing crisis through its Housing Strategy 2021-25 and its increased delivery of social rented housing within its council HRA stock.

1.6 Within this strategic context and national direction, there is a strong synergy with regard to our local objectives and targets as set out below

- MDDC Housing Strategy - 19 objectives within Strategic Housing Priority 1 including those specific to supply of new homes and sustainability, meeting housing needs and raising building design standards including piloting MMC, design quality and climate change

- MDDC Corporate Plan 2024-28 – Homes as a strategic theme with specific objectives to increase the delivery of quality designed, well built homes across the housing market to meet identified needs and building of energy efficient and low carbon homes

- Rolling 5-year/500 unit HRA development programme with sub-targets around MMC delivery

1.7 The Housing Strategy is due for review with the adoption of a new strategy in 2026 where a review and assessment of the HRA building approach as set out within this report is timely.

1.8 With respect to the HRA development programme for MDH, it has allocated 29 additional properties within its stock since April 2024 and has acquired a further 28 units ready for occupation shortly. A number of additional sites have full planning permission for social housing with development commenced on several of these. These have been a mix of buy-back acquisitions, traditional build schemes and MMC modular net-zero. It is worth noting that MMC therefore only represents an element of the MDDC HRA development pipeline – albeit that it is providing a steady flow of additional properties to the portfolio, as referenced below. It is also worth noting that MDDC has also been instrumental in enabling the delivery of other affordable housing units within the district – for example the 70 new properties at Post Hill.

1.9 In respect of its delivery MMC modular net-zero carbon units, three schemes are now fully complete and the Council are moving forward with additional Zed Pods designed and commissioned schemes as set out below.

- St Andrews House, Cullompton – 6 units (complete March 2024)
- Shapland Place, Tiverton – 8 units (complete October 2024)
- Crofts, Sandford – 5 units (complete April 2025)
- School Close, Bampton – 18 units (underway – due for completion January 2026
- Beech Road, Tiverton – 8 units (underway – due for completion September 2025)
- Holly/Sycamore Road, Tiverton - 13 units (underway – due for completion November 2025)
- Fir Close, Willand – 1 unit (underway – due for completion November 2025)

- Eastlands, Hemyock - 5 units (underway – due for completion December 2025)
- Somerlea, Willand - 7 units (planning permission obtained – due to commence August 2025)
- Watery Lane, Tiverton - 10 units (planning permission obtained – due to commence January 2026)
- Roundhill, Tiverton – potentially 12 units (currently in pre planning – due to submit July 2025)
- College Green, Uffculme - 2 units (planning permission obtained – due to commence September 2025)
- Churchill Drive, Crediton – 3 units (planning permission obtained, due to commence February 2026)

There are a number of additional projects at concept, early design or draft planning stage for implementation later in the development programme with an ongoing emphasis on MMC net-zero specification homes.

Funding and external assessment

1.10 MDH fund all of its schemes through the HRA with a key contribution from external funding sources in order to provide viable, high-quality and which are typically available at lowest, most affordable social rent. External funding grants have come via AHP and the One Public Estate (OPE) Brownfield Release Fund (BRLF) including the Prisoner Building Homes funding alongside one-off Devolution Programme support.

1.11 The Council's bids into these external funding schemes are subject to a strict assessment criteria and capital funding rules where the Council has been successful in its leverage of maximum grants for its modular housing schemes in particular. This is due to a range of factors directly associated with the Zed Pod developments and our development approach:

- Project deliverability;
- Track record of successful deliverability;
- Suitability for infill regeneration projects at point of need/within existing settlements and HRA developments;
- Design and high quality specification (MMC and operational net-zero, ultra-low energy/tenant utility costs); and
- Social rent and high potential for tenancy sustainment

1.12 In the last 12-months alone, our MMC net-zero schemes have unlocked around £5.5m of grant funding at an average of £75k per unit, outperforming contributions to traditional, lower-specification schemes. This has significantly enabled and supported the viability of these schemes at the most affordable social rent level, thereby reducing the net-cost of the Council and its HRA and enabling it to meet its Housing Strategy and Corporate Plan objectives.

1.13 Each of these external funding programmes undergo an independent scheme by scheme viability and value for money (VfM) assessment where the overall

project costs must fall within defined parameters. The case of AHP this includes benchmarking against national metre square floor costs. Unless our schemes fall within the required VfM parameters they are ineligible for funding.

1.14 Whilst Homes England and OPE/Ministry of Housing, Communities and Local Government (MHCLG) do not provide applicants (or otherwise publish) the specific VfM outcomes for each scheme in order to maintain commercial sensitivity and a level playing field for applicants, all of the Council schemes have been determined as eligible – demonstrating that Government assessors are happy with the information and costs submitted in relation to our grant funding applications. Feedback is that our MMC modular schemes sit at the upper end of VfM and therefore attract a higher level of financial support.

1.15 As a result of its deliverability and VfM track record in MMC and net-zero social housing, the Council have become a 'continuous market engagement' delivery partner with Homes England.

1.16 From April 2025, this Homes England partnership enables the Council continued access to the AHP programme post-2026 facilitating grant funds for more schemes that will complete much later (by March 2029). This provides the Council with ongoing, more seamless and extended access to AHP whilst a future AHP scheme is developed and is very much a vote of confidence in our development programme and our track record of successfully in delivering new, high quality social housing.

1.17 Under this extended, continuous engagement arrangement, funding allocations will be made within the same parameters as the current AHP 2021-26 including priority for MMC and social rent. This demonstrates the importance of MDH meeting these key national requirements in full and validates the innovative modular development programme approach that the Council has adopted alongside other methods of delivery.

2 Typical MDH modular build and design

2.1 The Devon Housing Commission report has evidenced the importance of providing more, high quality affordable housing that meets local needs. Consequently, it is important we continue to deliver social housing into the MDH stock in locations of demand, at a scale and type that meets measured housing needs and helps to sustain our village and town communities.

2.2 The MDH development programme with its modular MMD focus was designed from the outset to meet common objectives through a 'right home at right place' approach with a number of core features:

- Smaller, infill schemes scaled to meet local needs across the district
- Use of brownfield, under-utilised land within existing communities
- MMC off-site construction to minimise construction phase impact on current residents and neighbours
- High-quality, long-term design that meets a wide range needs
- Focus on low-tenant costs and long-term tenancy sustainment

- Provision of local infrastructure improvements to support wider regeneration and local benefits e.g. local drainage improvements, additional community parking, biodiversity enhancements
- Unlocking maximum grant funding to support viability

2.3 As a result, the typical MDH MMC modular scheme has the following characteristics:

Location and design	Approach	Performance
• Use of former redundant garage and other brownfield land with demolition of existing structures and removal of asbestos containing materials (e.g. garage roofs), • Bringing low-value land into productive use • Small scale, 7-8 units on average, within the curtilage of existing MDH communities • 1-3 bedroom units; mix of flats, maisonettes, bungalows and homes with private outside areas together with a mix of communal and private gardens • Flexible appearance and massing designed to work well with local architectural precedents / sensitive to existing conservation areas and other planning considerations • Additional mature planting and other biodiversity/landscape enhancements including bird and bat boxes, • Sustainable urban drainage provision, permeable parking above 1.7 spaces per dwelling requirements that is free to use by the local community	• Zed Pods ‘turnkey’ procurement – feasibility, design, planning, build and commissioning under proven performance standards • Pre-planning engagement with the MDDC Development Management and local town and parish councils, current MDH tenants and wider residents • Wholly new build plus net-uplift - replacement of end-of-life existing, low EPC homes on specific schemes with an increase in overall number of units • Measurable overall social value uplift (see St Andrews project example in Annex D)	• Highest Energy Performance Certificate (EPC) A+ rated and net-zero operational carbon certification • Roof mounted photovoltaic solar panels for electricity generation and heat pumps with mechanical ventilation and heat recovery • Significant energy/utility cost reductions for tenants together with water saving design and energy efficient appliances • Steel frame with thick wall natural stone wool insulation, triple glazing • Reduced maintenance cycles and lower long-term costs • Meet or exceed Building Regulation requirements including new-homes durability and minimum 60-years lifespan, nationally described space standards, overheating and all relevant safety standards including fire safety

2.4 Further information on the design and quality assurance standards that underpin Zed Pod modular homes is set out in Annex A.

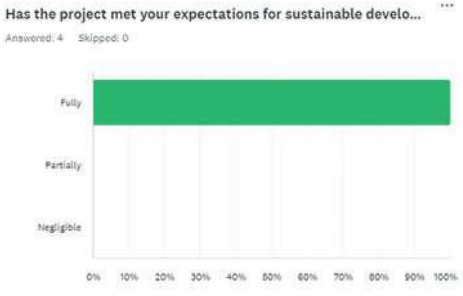
3 Innovation, evaluation and awards

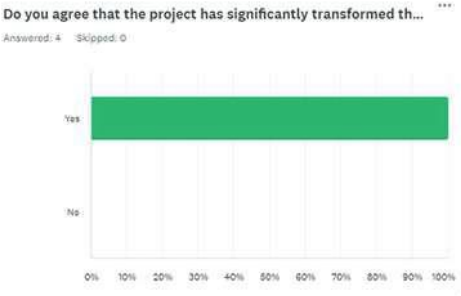
3.1 Whilst MMC and off-site modular construction of homes is common across Europe and the USA it remains less widely used and understood in the UK and consecutive Governments have been keen to promote and expand its use as a mechanism to deliver additional homes at pace. Despite rapid advancements in materials, manufacturing, digital transformation and technology, the development sector has nonetheless largely remained largely unchanged and focused on traditional build.

3.2 Innovation, and therefore change, sits at the heart of the Council's MMC modular approach and demonstrates how high quality, durable, low-carbon future-proofed MMC social housing can be viable and delivered at social rent levels whilst achieving wider regeneration benefits and sustainability benefit for local communities.

3.3 As result, this non-traditional development focus has required ongoing education and engagement to set out the rationale and benefits of our approach. Nonetheless, the feedback from all stakeholders including Homes England, OPE, local and district members, new tenants and the wider public has been overwhelmingly positive and the strong, positive alignment with national and local strategic housing objectives has been clearly defined.

3.4 This feedback isn't just strategic at one level or anecdotal at another, it has been unpinned by post-occupancy evaluation (such as the University West England' report a Zed Pod modular project at Hope Rise, Bristol) and the survey of residents at our St Andrew's House scheme as set out below.





3.5 Our modular schemes have also been visited post-completion as key demonstration projects by a number of MHCLG, Homes England and OPE teams together with visits by a wide number other Local Authorities / private registered social housing providers and Devon County Council commissioning and delivery colleagues.

3.6 This has generated a high level of regional and national recognition through our St Andrews House and Shapland Place schemes in particular with these either winning or being a finalist in a number of development awards, as listed in more detail in Annex C.

3.7 MDH and Zed Pods were also invited to present on our collaboration and innovation in delivering modular social housing at the Chartered Institute of Housing (CIH) South-West Regional Conference in February 2025. As a result, we have been jointly invited to do the same at the joint, national CIH / National Housing Federation 'Housing Community Summit' in September this year. An event which brings together the housing sector's key stakeholders, politicians, and housing leaders and practitioners from across the country to debate and shape the future of social housing.

4 Traditional versus Modular construction

4.1 A number of independent studies have been published that take a closer look at these different approaches to construction. Examples include the Jones Lang LaSalle study (2021), Procurement Partnership Frameworks (2022), BES (2024) and Travis Perkins (2025).

4.2 These studies provide helpful, independent comparative analysis and typically focus on three areas – time, cost and quality/design and sustainability.

Time

4.3 When considering the various differences between MMC and traditional housebuilding, perhaps the most obvious is time to completion. On average, off-site manufacturing reduces construction time on-site by around a third.

4.4 Notwithstanding delays caused by poor utility mapping and under-capacity in utility providers to resolve issues quickly, which impact brownfield traditional and MMC projects equally and is a national issue, for social housing developers and local authorities including MDH, this time saving directly translates to revenue generation, as we can fill tenancies more quickly and begin to collect rent. Furthermore, the ability to produce more social housing quickly into our stock provides much needed support to address the local housing crisis and deliver on our strategic housing goals.

4.5 MMC's ability to deliver units more quickly, together with strong quality/sustainability credentials and VFM benchmarking, is therefore one of the main reasons it is being prioritised by Homes England's AHP (2021-26).

4.6 Potentially therefore, time savings on-site and quicker completions could be sufficient reason for more developers to explore MMC when the UK is in the

midst of a housing crisis and perennially missing its 300,000 homes a year target. Unfortunately, it is unlikely the time savings alone will encourage private build- for- sale developers to fully embrace MMC, particularly high-volume builders that hold significant numbers of a existing permissions and extensive land-banks where market control may be featured more strongly over speed of delivery. These time-saving considerations are perhaps much more of interest to social housing developers, hence the Council embracing an MMC approach where time is considered to be a significant factor.

Cost

4.7 As highlighted above, one of MMC's main advantages relates to the time it can save in the construction process. However, at present it is not automatically a cheaper way to build homes. MMC requires a constant pipeline, a repetition of product, and thus relies on economies of scale or highly localised manufacturing efficiencies and flexibility in order to generate ever-more efficient returns. Thus, larger scale projects and a consistent pipeline would mean eventual, more significant cost savings, but as it stands today, the industry is not at that scale.

4.8 Equally, this does not mean small scale modular projects, such as those the Council are undertaking, delivered in close collaboration with development cannot compete against traditional build costs, especially when benchmarked fairly against lower-volume and smaller scale brownfield traditional built schemes. This is evidenced through the AHP and other external funding VFM and assessment process as set out above and through an individual analysis of whole project costs and our completed schemes to-date. More information and data on benchmarking our Zed Pod modular schemes is set out below and in Annex B.

4.9 Cost can also relate to much more than just build cost. If you take into account less time on site, council tax and rents coming in quicker, less waste overall, less repairs in the future, and less disruption to neighbours and the community during construction, it could be seen as a cost benefit in the long run.

4.10 These added value factors can be used to develop a social value cost-benefit ratio for a specific scheme which provides a much more realistic, holistic assessment of value capturing a range of benefits. This includes tangible and measurable benefits in monetary terms, directly impacting budgets, non-cashable benefits that improve value for money, community benefits and other benefits that are difficult to monetise but improve quality of life, well-being or enhance public trust and engagement.

4.11 This has been recognised by Zed Pods who have been working in conjunction with the Ministry of Justice (in respect of its engagement in the Prisoner Building Homes programme) and the Council to develop such an assessment which draws upon published, verified sources of data including many produced by central government as part of an economic appraisal approach that forms a

critical part of the HM Treasury Green Book business case methodology – a standard approach that can be used by Council's and the wider public sector in seeking approval of capital projects.

4.12 This social value appraisal is a developing approach, however a draft example report for St Andrews House is shown in Annex C which shows a significant overall benefit / cost ratio of 8.15.

Quality, Design, and Sustainability

4.13 One of the greatest differences between traditional building and MMC is the ability to ensure a level of quality in the finished product that meets exact design specifications.

4.14 Due to its repeatable manufacturing process in a controlled indoor environment compared to a less controlled outdoor process, manufacturers of off-site modular units can guarantee homes that will achieve certain design standards and meet regulatory safety requirements. Design errors can be closely monitored under accredited processes and systems (e.g. ISO 9001 and 45001) where any issues can immediately be identified and addressed, significantly mitigating risk.

4.15 The durability of MMC is further key consideration. The Zed Pods MMC specification has longer replacement cycles for key planned maintenance items such as doors, windows, roofs and kitchens. Enhanced life cycles and planned maintenance cost reductions can be built into the long-term financial planning of the HRA with confidence, further supporting the overall viability of the schemes. This is enhanced further where MMC is used to replace end-of-life or poorer quality stock with higher planned maintenance costs where less beneficial expenditure can be removed from the future balance sheet delivering net savings in the long-term and supporting the overall financial sustainability of the HRA.

4.16 One of the biggest, emerging challenges facing the housing sector currently is fire safety. This includes the provision of non-combustible insulation and cladding materials with a more stringent focus on building safety. MMC has a clear advantage over traditional build given the controlled manufacturing process and assurance that each unit is an exact replica of the original design to ensure regulatory standards are met. Additionally, as all the data for each design is readily accessible, it is straightforward to establish the exact specifications of each unit so if there were any issues with materials it would be straightforward to identify products and units affected and thus easier to resolve.

4.17 With traditional build however, there is no guarantee that the contractors have been able meet the exact design specifications and significantly less control over the overall construction process.

4.18 It is becoming widely accepted that decarbonisation is becoming one of the greatest driver for change in the construction industry. Recent data from the

Department for Business, Energy & Industrial Strategy shows that in 2020, the residential sector accounted for 21% of all carbon dioxide emissions. The UK has committed to be Net Zero Carbon by 2050 with Council adopting an even more stringent aim of being carbon neutral by 2030, therefore the homes being built must be highly energy efficient. According to a number of manufacturers, MMC delivers at least an EPC B. In the case the Zed Pod units provided the Council this is higher again at EPC A and certified operational zero-carbon.

Potential MMC constraints

4.19 No construction approach is perfect and there are constraints or challenges inherent with each that is chosen. The challenges of MMC include a general risk uncertainty from potential tenants and clients which can be overcome through education and engagement. As noted above, post-occupancy surveys at our longest running scheme (St Andrews House) have shown very high levels of tenant satisfaction.

4.20 There has been similar risk aversion from some warranty providers which is again being addressed and all the Council MMC schemes come with industry standard, full 10-year new build warranties including the high quality 'Q Policy' and ICW warranty assurance. This means our units are being built to a fully mortgageable standard.

4.21 Further disadvantages include the fact that some people don't like how modular styles look. This was more the case through early designs when the MMC industry was in its infancy. Since then, newer providers such as Zed Pods and others have been able to bring forward designs that are highly flexible where completed schemes can be indistinguishable from contemporary and older traditional build architypes.

4.22 There needs to be assurance on structural design to avoid fragmentation, especially if material choices and assembly are poor. This is overcome through BRE (Building Research Establishment) design assessment, Buildoffsite Property Assurance Scheme (BOPAS) including steel framed systems and other accreditations using an architect led approach. All of which is applicable to Zed Pods and an essential consideration in any MMC supplier the Council uses. See Annex B for further information.

4.23 MMC and net-zero heating systems are different from traditional gas-fired or other electrical heating systems with benefit of a high degree of thermal stability. All of which feels different to tenants more familiar with traditional build properties and conventional systems. This has been overcome through the MDH teams working closely with our supplier to on-board tenants including the use of bespoke welcome leaflets and home user guides.

4.24 Some UK planning teams remains cautious of MMC and modular buildings, unlike countries such as Scandinavia who have adopted MMC more widely. This comes down to awareness, familiarity and experience of specific planning officers. This potential challenge has not been the experience in Mid Devon and we have worked closely with the Planning Development Management team

through a demonstration unit, site visits and the pre-application process to overcome any misunderstandings.

4.25 Finally, off-site manufacture requires the development site having adequate road access to enable HGV/crane delivery of the modular units. With planning and careful route and site assessment. Almost all sites within the district that have been evaluated have proven suitable, however a small number of sites are too constrained where traditional or different types of MMC schemes may be required.

5 Benchmarking of MMC modular schemes

5.1 Largely setting aside where the Council's MMC approach aligns and underpins its strategic objectives and social housing delivery as described above, there is still validity in undertaking more quantitative cost benchmarking of our new housing schemes against other housing projects in order to provide assurance on VfM.

5.2 As has been set out above, there are a number of key over-arching differences between traditional build and MMC development approaches. There are further site-specific differences ranging from specification of each home and energy performance, unit sizes, low-volume brownfield vs high-volume greenfield sites, utility constraints and costs, demolition and disposal costs, infrastructure and wider regeneration deliverables together with sites with or without significant communal build spaces. There also significant differences in overall value and long-term costs with variable benefit to cost ratios.

5.3 It is also valid to highlight the differences between VfM and cheapest or low-cost. VfM goes beyond cost savings by considering the overall benefits of a purchase or investment. It evaluates quality, sustainability, risk mitigation, and long-term outcomes relative to the cost and needs to consider the life-cycle of the asset not just the up front cost.

5.4 When it comes to overall viability and VFM of a particular scheme, then it is not just a comparison or assessment of gross project cost but requires an understanding of the net cost to the Council. This is particularly relevant where different specification and design/delivery approaches can unlock variable levels of external grant funding as set out in Section 1 above.

5.5 As with all public sector expenditure on goods and services, the process of procuring new housing must comply with strict public procurement rules including the recently implemented Procurement Act 2023. Whilst all of its new housing contracts are fully compliant with these legal requirements, there are nevertheless differences in terms of the competitiveness of a procurement exercise and the number of suppliers able or willing to enter into a process and provide a price against a specific required specification.

5.6 In order to provide assurance in respect of procurement and ensure maximum consistency of pricing without putting each housing scheme through an expensive bespoke market tendering exercise, direct awards may be

undertaken. A direct award is permitted under the current procurement legislation and each direct award is made under a compliant framework.

5.7 Frameworks are umbrella agreements that set out the terms, that include specification, quality, price, quantity, under which individual contracts (call offs) can be made during the lifetime of the framework (normally 4 years). Legislation governs the way frameworks are run. Suppliers compete through open competition to be appointed to a framework. Publicly funded contracting authorities such as the council then call off individual contracts.

5.8 In terms of VfM considerations, the key advantages of direct awards via frameworks is the scale and assured volume of potential delivery across a wide number of potential clients and organisation is attractive, therefore they attract a wide range of suppliers. The frameworks also provide wider assurance due to in-depth expertise in specific sectors, high quality specifications and pre-tender engagement through to consistency and independence of the evaluation and award process. They also provide additional financial protections to organisations calling off contracts. Overall, these benefits substantially de-risk the process for the Council in what are major capital investments. There are further advantages in speeding up the procurement process and enabling housing to come forward more quickly.

5.9 These differences and considerations make benchmarking costs highly challenging where it is easy to arrive at invalid comparisons as a result. Where comparisons are made, where possible, it is important to set out the key differences between projects and specific sites where these are known in order to understand how cost differentials may arise in order to inform the overall VfM assessment.

5.10 Notwithstanding these challenges, a detailed benchmarking cost comparison is set out in Annex B which compares the costs of several complete or pending traditional build schemes with modular schemes within the MDH stock. Therefore, these are schemes contracted by the Council where it has full information on costs and specification. Against this, information has been obtained from other traditional or MMC schemes commissioned by other organisations but in similar settings (scale, social housing etc), some of which have also benefited from AHP grant and therefore assurance.

5.11 From Annex B, it is possible to compare unit or metre square costs for our completed St Andrews, Shapland Place and Crofts schemes and our Holly Road and Beech Road schemes currently under construction which are all Zed Pods MMC modular against a separate Beech Road scheme, a tendered build scheme in Cullompton, a completed social housing scheme in Bristol (New Kingsland) which are all traditional build and a different type of MMC affordable housing scheme completed in Portsmouth (EBC Former Post Office). All of these schemes have been priced (tendered), live and/or completed within the last 2-years in order to provide a valid comparison.

5.12 Of the non-Zed Pods MMC and traditional build schemes, these were selected due to the availability of data and that the schemes were all lower-volume, infill and typically brownfield regeneration projects providing affordable housing. However, none of the schemes has a comparable EPC A+ zero-operational carbon specification as provided for by the Mid Devon Zed Pods units and are all lower specification EPC B rated developments.

5.13 The findings of this benchmarking exercise are the MDH Zed Pods schemes consistently perform well in a comparison of measured unit and m2 costs of the other schemes, both traditional build and MMC as ranked in Table 1 below despite having highest overall EPC specification at social rent.

5.14 Of the five Zed Pod schemes in the comparison table typical of the Mid Devon development programme (complete and in progress units), four are in the top-five rankings (lowest cost). This includes the Shapland Place scheme characterised by exceptional regeneration and community benefit but with associated atypical infrastructure uplift i.e. more than double parking provision over planning policy requirements, steel podium/flood zone design, enhanced drainage attenuation and EV charging provision.

Table 1 – Summary of net cost benchmarking data (Zed Pod schemes in bold)

Ranking (Cost – Low to High)	Net average cost per unit*	Net cost per m2 (gross living floor area)
1	**St Andrews House Zed Pods MMC Modular**	**Beech Road Zed Pods MMC Modular**
2	**Beech Road Zed Pods MMC Modular**	**Holly/Sycamore Road Zed Pods MMC Modular**
3	**Holly/Sycamore Road Zed Pods MMC Modular**	**St Andrews House Zed Pods MMC Modular**
4	**Crofts Zed Pods MMC Modular**	9No. North Somerset, Bristol & Gloucs MMC Modular
5	**Shapland Place Zed Pods MMC Modular**	**Shapland Place Zed Pods MMC Modular**
6	Beech Road Traditional Build	Honiton Road Traditional Build
7	EBC Former PO MMC	**Crofts Zed Pods MMC Modular**
8	BCC New Kingsland Traditional Build	BCC New Kingsland Traditional Build
9	Honiton Road Traditional Build	Beech Road Traditional Build
10	-	EBC Former PO MMC

* Average costs are not available for the 9no. North Somerset, Bristol & Gloucestershire MMC Modular benchmarking in Annex B with net average m2 data only

5.15 Considering a summary of average net cost m2 benchmarking data by build type based on gross floor living area provided:

- Average all Zed Pods MMC Modular (5no. EPC A/Zero C): £2,571.88

- Average all traditional build schemes (3no. EPC B): £4,103.65
- Average all non-Zed Pods MMC (9no. EPC B): £2,387.65

The Zed Pod schemes largely perform better on a cost per m2 comparison against the traditional build schemes and are comparable with the non-Zed Pods MMC schemes. Both of these comparison schemes types are built to lower EPC specification that do not achieve zero-operational carbon performance.

5.16 This favourable net cost for the Zed Pods units is reflective of overall costs for delivery together with strong compatibility with external funding streams, enabling higher grant leverage and competitive net costs for the Council. This is whilst providing high quality accommodation that has lower running costs for tenants and enhanced tenancy sustainability alongside reduced cyclical planned maintenance costs long-term for the HRA, especially in comparison with traditional build schemes.

5.17 The ability to bring forward viable Zed Pod schemes at the formula social rent level further enhances the overarching strategic and financial alignment within the Council. In turn, this further strengthens our response to the housing crisis as a social housing provider through the provision of future-proofed homes at the most affordable, and therefore most accessible, rent level for our communities.

6 Conclusions and summary

6.1 Overall, the MMC modular housing building approach that has been adopted for Council Housing by MDH under its HRA is directly aligned with our wider national and local strategic objectives.

6.2 It forms a highly effective and tangible response by the Council in terms of the delivery of more affordable housing for local people at lowest social rent. The shorter on-site build times and overall reduced project timeline bring forward critical new housing at relative pace.

6.3 The Zed Pods MMC modular design and high quality specification for Mid Devon unlocks greater external funding support through the Homes England Affordable Homes Programme and the MHCLG Brownfield Release Programme in particular.

6.4 This strong placement of our MMC modular schemes provides greater certainty of delivery and de-risks the Council through; a reduction in the long-term costs to the HRA, enhancement of the overall viability of the projects and clear VfM benchmarks resulting in competitive net financial costs in comparison with traditional build schemes and other MMC.

6.5 These modular schemes are particularly suited to low-volume, infill sites using existing HRA land where they provide housing to meet defined local needs and support the sustainability of local communities.

6.6 The flexible, zero operational carbon, neurodiversity-friendly homes also help the Council to meet its corporate environmental, sustainability and social value aspirations with clear overall benefit to cost ratios.

6.7 The standards and design introduced by the Zed Pod units meet or exceed all regulatory standards and provide an innovative approach to social housing building that is inherently better than typical traditional build approaches. This is especially the case for the smaller, infill schemes required to meet housing needs and sustain our communities across the district.

6.8 The quality and effectiveness of our completed schemes is already been set out through post-occupation evaluation and feedback from tenants and other stakeholders and myriad of industry awards where the Council is building an enviable track-record of delivery.

6.9 Overall, the MMC modular programme is capable of playing a continued key role in the delivery of more Council houses for residents at a time of critical need. The programme demonstrates this can be done without compromise on quality and will drive forward improved tenancy sustainment through the high accommodation standards, significantly reduced tenant running costs and overall enhanced tenant experience.

6.10 Given such a positive assessment and strong overall VfM and deliverability, it is important that the Council continues to support, refine and grow its MMC modular housing building programme in order to meet its house building targets and wider objectives.

7 Recommendations

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

1. The PDG notes the report

2. That the PDG recommends that Cabinet continues to adopt an HRA development programme with a focus on delivering MMC, modular net-zero social housing where possible and viable as part of the Council's future Housing Strategy

Financial Implications

The activity of MDH including its development programme is funded through the Housing Revenue Account (HRA). The HRA is ring fenced and subject to specific financial controls.

In case of its modular MMC projects in particular, development costs are significantly supported through the successful leverage of external grant.

Financial benchmark data is set out in Annex B of the report and wider VfM considerations set out within the report.

Legal Implications

The compliance of the Zed Pods MMC residential build system with regulatory standards, performance, technical certifications and accreditation together with other related criteria are set out within report and in more detail within Annex A.

Risk Assessment

This is set out within the report including strategic context and alignments, an assessment of traditional build versus MMC modular construction, specification and further specific alignment with grant funding and reduced net financial costs, VfM benchmarks and the overall conclusions as summarised above.

Impact on Climate Change

All Zed Pods MMC modular development provided for the Council are EPC A+ and zero operational carbon rated.

Equalities Impact Assessment

Not applicable

Relationship to Corporate Plan

Homes are a strategic theme with specific objectives to increase the delivery of quality designed, well built homes across the housing market to meet identified needs and building of energy efficient and low carbon homes.

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151
Date: 25 June 2025

Statutory Officer: Maria de Leiburne
Agreed on behalf of the Monitoring Officer
Date: 25 June 2025

Chief Officer: Richard Marsh
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 25 June 2025

Performance and risk: Stephen Walford
Agreed by the Chief Executive
Date: 22 May 2025

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 information:

Zed Pods Ltd Homepage
OUR HOMES | ZEDPods

Mid Devon Housing Development Hub with access to more detail on specific modular and traditional build schemes in the current HRA development programme
MDH Development Hub | Let's Talk Mid Devon

HM Treasury 'Green Book' guidance on how to appraise policies, projects and programmes.
The Green Book and accompanying guidance - GOV.UK

Guidance on different types of Modern Methods of Construction (MMC)
Microsoft PowerPoint - The MMC Definition Framework - Michelle Hannah (July 2019)

Social Rent Housing at Pace – The MMC Playbook (Housing Festival 2024)
Social Rent Housing at Pace Playbook — Housing Festival

Guidance on direct award procurement frameworks
Procurement Routes - Building Better
Modern Methods of Construction (MMC) for New Homes (NH3) | Frameworks | LHC LSE

BOPAS accreditation for Zed Pods
ZED PODS - BOPAS

ICW building warranty information as applicable to Zed Pods
Building Warranty Specialists | ICW Insurance Services

More information on the Considerate Constructors Scheme
Considerate Constructors Scheme

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Annex A Zed Pods Standards

General

Zed Pods Ltd are an architect-led turnkey modular build company providing high specification homes that are zero carbon in operation. Their focus is on the delivery of high quality modular buildings and associated services that meet, and in some cases exceed, all relevant statutory and regulatory standards. They provide eco-friendly, affordable housing solution through the utilisation of volumetric offsite MMC technology.

They are part of a number of approved public sector procurement frameworks including the Building Better MMC Category 1 and 2 Frameworks and SWPA (South West Procurement Alliance) MMC New Homes NH3 (previously NH2). They are also a Crown Commercial Service and NHS approved supplier.

They also hold the King's Award for Enterprise for Sustainable Development, awarded in 2024. They are a Certified Delivery Partner of "Zero Bills" by Octopus Energy, while Zed Pods' manufacturing business holds B-Corp Certification - a designation demonstrating that a business is meeting high standards of verified performance, accountability, and transparency on factors ranging from employee benefits and charitable giving to performance, supply chain practices and input materials.

Design, Architect and Quality

Zed Pods controls the build from design, planning, manufacture and onsite construction.

This is further overseen by the following ISO accreditations:

They have an in-house architectural design team with the following accreditation and registrations:

- CIAT (Chartered Institute of Architectural Technologists)
- RIBA (Royal Institute of British Architects)

Their residential build system has an in-depth and independently verified structurally engineered approach as set out below. This includes all the current and proposed systems in use of Mid Devon Housing schemes.

Zeds are also now an ISO 19650 organisation ((LRQA accredited). ISO 19650 is an international standard that enables the secure management of information across the entire lifecycle of a built asset using Building Information Modelling (BIM). It follows the same principles and requirements as the UK BIM Framework and is closely aligned with the existing BS 1192 standards. One of the key benefits of BIM is that it provides clients with a "digital asset", enabling a fully traceable "Golden Thread of Information". This supports streamlined access to information, cost-effective proactive maintenance, and reduced downtime for repair works.

Engineering and durability

Zed Pod engineers are CEng, MISTRUCTE, MICE accredited personnel (Chartered Engineer, Member of the Institution of Structural Engineers and Member of the Institution respectively). They are also Approved Certifiers of Design (Building Structures) and cover all aspects of the building structure. They further hold SCI membership and ICW accreditation (Steel Construction Institute and Insurance Company of the West respectively).

The Zed Pod modules have been fully engineered for snow and wind loads in multiple exposure locations in the UK.

Their residential designs are a certified building system developed and tested by the Building Research Establishment (BRE).

This is backed up by accreditation with BOPAS (The Build offsite Property Assurance Scheme) which includes the steel frame systems used on all Mid Devon schemes which holds a minimum durability assessment of 60 years.

Zed Pods also holds the industry leading ICW Endorsed accreditation. This follows a rigorous technical assessment of the Zed Pods build system to ensure it meets ICW's stringent technical requirements. ICW Endorsed is a bespoke accreditation scheme for Modern Methods of Construction (MMC) offsite systems for use in conjunction with ICW A-rated structural warranties.

All Zed Pod modules supplied to the Council have triple-glazed windows and doors. These last up to three times longer than standard uPVC units, offering significant long-term maintenance savings.

The modular units exclusively use copper pipes instead of plastic, as copper is known for its strength and longevity - often lasting several decades

Safety and performance

All schemes completed hold full planning permission and have full Building Control approval and sign-off prior to occupation.

In addition to those engineering and durability standards set out above, in terms of specific safety and performance:

Energy – all building provided to Mid Devon are EPC A+ Highly Efficient Buildings: super-insulated, air tight homes with minimal energy demands (ENE1 9 or 10 credits under the Standard Assessment Procedure or SAP). The design incorporates the lowest running costs and modern low-carbon technologies ensuring ultra-low energy consumption and cheaper running costs, with solar panels to generate renewable electricity in the day, quiet running heat pumps for low energy heating, controlled ventilation which recovers usable heat from inside the building whilst bringing in the fresh air.

Space standards – all residential schemes meet the nationally described space standards. As the formal Principal Designer and developer, Zed Pods are responsible for incorporating this into each building design and this is checked by MDDC Development Control at Planning Approval stage to ensure the minimum standards are met. Post-completion, as built measurements have been taken at several schemes to further verify compliance.

Fire – all the Zed Pods buildings and construction processes meet or exceed the 2022 Building Safety Act requirements. Under their build system all materials used are A-rated for fire and have full fire stopping logs in compliance with the “golden thread”, enhanced by digital technology and record keeping. All materials carry performance declarations and/or BBA certificates. All our modules use stone wool insulation (A-rated) and their modules have never used combustible insulation materials or cladding. The party walls are fire resistant up to 60 minutes on both sides of the wall, effectively giving the modules 120 minutes before a fire in one module would break through to the next. This is well above the requirements under building regulations.

The modular units use only fire-rated plasterboards and certified fire doors throughout the buildings to enhance fire protection and withstand heavy use.

In addition, the homes in Mid Devon include remote monitored AICO sensors for smoke heat and moisture detectors to provide an extra layer of monitored fire safety.

Overheating – all Zed Pods buildings exceed Building Regulation Part ‘O’ requirements and include both passive and active cooling technologies where required. This includes Dynamic Thermal Modelling assessments as required

following the full Chartered Institution of Building Services Engineers (CIBSE) TM59 Design methodology.

Mould risk - mould risk has been carefully considered. As a social housing provider, we must comply with all regulatory standards including new, stringent requirements under Awaab's Law. As such, this has been a key design consideration to ensure that our new modular building future-proofed and mould protection is built-in. Fully breathable walls prevent moisture build-up without compromising airtightness or thermal performance. The Mechanical Ventilation with Heat Recovery (MVHR) linked heating and ventilation systems prevent the mechanical ventilation being switched off so the buildings are continually ventilated in a controlled manner. Zed Pods have had buildings in constant occupation since 2020 without any issues.

RAAC - reinforced autoclaved aerated concrete (RAAC). RAAC material have been widely publicised in recent years due the failure of the material in public buildings including schools and hospitals were expensive building remediation or replacement has been required.

It was used mostly 1950s and 1990s as a cheaper alternative to standard concrete that was quicker to produce and easier to install. However, it is less durable and has a lifespan of around 30 year with a structural behaviour differs significantly from traditional reinforced concrete.

No RAAC has ever been used in Zed Pods buildings or homes.

Other specification and social value

Acoustic performance – high performance acoustic rated insulation materials, high performance glazing (inc. triple glazing) and enhanced party wall details create exceptional, above traditional build standard acoustic attenuation

Neurodiversity - together the enhanced energy specification performance as set out above, the acoustic performance and high levels of natural lighting bring benefits for neurodiverse tenants.

Healthy living - no toxic materials with be used and no urea-based insulation systems deployed with low VOC paints and adhesives, vapour-permeable, breathing wall construction.

Prisoners Building Homes Programme - Zed Pods are the largest employee within the PBH. 31 day-release inmates have worked so far in the Zed Pods factory which is a third of the workforce. National living wage paid where up to 35% goes to Victim Support and remaining wages are held in trust for prisoners on release to support rehabilitation, employment and accommodation. Prisoners are upskilled; NVQ's, Forklift/ Scissor Lift skillset with wraparound support including mental health. This provides them with core employment skills for the future and overall Zed Pods reoffending rate under 3% against a national average of between 25-50%. The Ministry of Justice have estimated that for every £ spent gives a £3 return.

Engagement with PBH has meant Mid Devon have recently been able to access additional grant funding from the Ministry of Housing, Communities and Local Government towards specific development schemes, reducing net costs further.

Considerate Constructors – all Mid Devon Zed Pods projects have been managed under accreditation to the Considerate Constructors scheme. This includes meeting the Code of Considerate Practice which embodies the high standards the industry can and should achieve. There are clear, attainable guidelines in the Code that help Zed Pods and its sub-contractors make positive changes to the way they work including managing the impact on neighbours and the public, minimising or enhancing environmental impact and valuing the workforce through a supportive, inclusive, and healthy workplace.

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Annex B: Benchmarking Zed Pods MMC modular v other MMC modular v traditional build (unit and m2 costs)

MDH Beech Road, Tiverton (CA124)		Order Value
Outline specification		
Build type	**TRADITIONAL BUILD**	
EPC rating	B	
Op Net-Zero carbon	No	
Demolition and ACM removal	No	
Additional infrastructure	No	
Other	No	
Notes	Project managed in-house, therefore excludes full project staff management costs. Excludes BC costs	
	Architects	£2,850.00
3 x 1 Bed Flats	Surveys	£720.00
	Civil and structural consultancy	£3,850.00
	Civil and structural consultancy	£1,020.00
	Construction consultancy	£3,800.00
	JTT Contracting	£915.00
	Construction consultancy	£2,000.00
	Construction consultancy	£132.00
	Civils	£7,559.00
	South West Water	£1,940.00
	South West Water Business	£1,940.00
	Property agency	£600.00
	Engineering consultancy	£32,846.21
	Construction contractor	£472,589.09
	South West Water Ltd	£1,940.00
	Engineering consultancy	£11,874.23
	Engineering consultancy	£7,298.56
	Engineering consultancy	£6,625.00
	Architects	£3,150.00
Total Spend		**£563,649.09**
	Average cost per 1 Bed Unit	**£187,883.28**
Funding	None	£0.00
	TOTAL	**£563,649.09**
	Average NET cost per 1 Bed Unit	**£187,883.28**
	Average NET cost all Units	**£187,883.28**
	NET cost per m2	**£4,697.08**

MDH St Andrews House, Cullompton (CA155)		Order Value
Outline specification		
Build type	**Zed Pods MMC MODULAR**	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	No	
Other	Yes (biodiversity uplift and glazing uplifts via planning conditions)	
Notes		
	Planning consultant	£5,380.00
3 X 1 Bed Flats	External legal	£850.00
3 X 2 Bed Flats	ZedPods	£27,540.38
	ZedPods	£73,571.12
	ZedPods	£38,268.05
	ZedPods	£436,731.95
	ZedPods	£312,354.99
	ZedPods	£324,457.44
	Demolition and ACM remove/disposal	£128,009.10
Total Spend		**£1,347,163.03**
	Average cost per 1 Bed Unit	**£208,553.99**
	Average cost per 2 Bed Unit	**£240,500.35**
Funding	BLRF	**-£120,000.00**
	1:4:1 Capital receipts	**-£538,865.21**
	TOTAL	**£688,297.82**
	Average NET cost per 1 Bed Unit	**£101,982.90**
	Average NET cost per 2 Bed Unit	**£127,449.71**
	Average NET cost all Units	**£114,716.30**
	NET cost per m2	**£2,305.08**

MDH Beech Road, Tiverton (CA169)		Order Value
Outline specification		
Build type	**Zed Pods MMC MODULAR**	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	Yes (utility diversions required)	
Other	No	
Notes		
	ZedPods	£2,067,879.28
4 X 1 Bed Flats	Demolition and ACM remove/disposal	£130,465.95
4 X 2 Bed Flats		
Total Spend		**£2,198,345.23**
	Average cost per 1 Bed Unit	**£258,735.05**
	Average cost per 2 Bed Unit	**£290,851.25**
Funding	BLRF	**-£80,000.00**
	MMC CLA	**-£336,000.00**
	HE AHP	**-£753,904.00**
	TOTAL	**£1,028,441.23**
	Average NET cost per 1 Bed Unit	**£119,026.02**
	Average NET cost per 2 Bed Unit	**£138,084.29**
	Average NET cost all Units	**£128,555.15**
	NET cost per m2	**£2,142.59**

MDH Holly/Sycamore Road, Tiverton (CA170)	Item/supplier	Order Value
Outline specification		
Build type	**Zed Pods MMC MODULAR**	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	Yes (additional parking provision and BNG)	
Other	Yes (additional higher spec safety fencing for adventure playground)	
Notes		
	ZedPods	£3,212,610.70
10 x 1 Bed Flats	Demolition and ACM remove/disposal	£212,483.06
3 x 2 Bed Houses		
Total Spend		**£3,425,093.76**
	Average cost per 1 Bed Unit	**£273,109.17**
	Average cost per 2 Bed Unit	**£347,001.02**
Funding	BLRF	**-£180,000.00**
	MMC CLA	**-£335,000.00**
	HE AHP	**-£1,287,026.00**
	TOTAL	**£1,623,067.76**
	Average NET cost per 1 Bed Unit	**£128,211.87**
	Average NET cost per 2 Bed Unit	**£170,474.53**
	Average NET cost all Units	**£135,255.65**
	NET cost per m2	**£2,215.67**

MDH Honiton Rd Cullompton (CA183 tendered, contract pending)		Order Value
Outline specification		
Build type	**TRADITIONAL BUILD**	
EPC rating	B	
Op Net-Zero carbon	No	
Demolition and ACM removal	Yes/limited	
Additional infrastructure	No	
Other	No	
Notes		
	Planning consultant	£10,271.00
2 X 2 Bed Houses	Planning consultant	£950.00
	Planning consultant	£2,500.00
	Planning consultant	£2,495.00
	Planning consultant	£1,700.00
	Planning consultant	£80.00
	External legal	£1,750.00
	Direct Oncosts for procurement and contract mgt	£9,654.33
	Demolition and ACM remove/disposal	£19,453.85
	Average bid before tender scoring/award	£396,000.00
Total Spend		**£444,854.18**
	Average cost per 2 Bed Unit	**£222,427.09**
Funding	None	£0.00
		£444,854.18
	Average NET cost per 2 Bed Unit	**£222,427.09**
	Average NET cost all Units	**£222,427.09**
	NET cost per m2	**£3,110.87**

MDH Crofts Estate, Sandford (CA164)		Order Value
Outline specification		
Build type	**Zed Pods MMC MODULAR**	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	No	
Other	No	
Notes		
	Demolition and ACM remove/disposal	£53,400.00
5 x 1 Bed Flats	ZedPods	£1,440,305.48
		£1,493,705.48
	Average cost per 1 Bed Unit	**£298,741.09**
Funding	BLRF2	**-£100,000.00**
	HE AHP	**-£506,305.00**
		£887,400.48
	Average NET cost per Unit	**£147,900.08**
	Average NET cost all Units	**£147,900.08**
	NET cost per m2	**£3,321.36**

MDH Shapland Place, Tiverton (CA154)	Supplier	Order Value
Outline specification		
Build type	**Zed Pods MMC MODULAR**	
EPC rating	A+	
Op Net-Zero carbon	Yes	
Demolition and ACM removal	Yes	
Additional infrastructure	Yes (wider SUDs, flood attenuation, additional parking, EV)	
Other	Yes, planters and mature planting, revised balcony screens	
Notes		
	ZedPods	£2,030,233.22
4 x 1 Bed Flats	Demolition and ACM remove/disposal	£82,228.81
3 x 2 Bed Flats		
1 x 3 Bed Flats		
		£2,112,462.03
	Average cost per all Units	**£264,057.75**
Funding	BLRF2	**-£160,000.00**
	HE AHP	**-£692,000.00**
		£1,260,462.03
	Average NET cost all Units	**£157,557.76**
	NET cost per m2	**£2,874.49**

Bristol City Council New Kingsland	Item/supplier	Order Value
Outline specification		
Build type	**TRADITIONAL BUILD**	
EPC rating	B	
Op Net-Zero carbon	No	
Demolition and ACM removal	Yes	
Additional infrastructure	Unknown	
Other	Unknown	
Notes		
7 x 1 Bed Flats	Total scheme cost	£4,951,635.00
4 x 2 Bed Houses		
6 x 3 Bed Houses		
		£4,951,635.00
	Average cost all units (no breakdown data available)	**£309,477.19**
Funding	HE AHP	**-£1,600,000.00**
		£3,351,635
	Average NET cost all Units	**£209,477.19**
	Est. NET cost per m2	**£3,724.04**

Eastleigh Borough Council			9No. North Som, Bristol & Gloucs		
Former PO, Portsmouth	**Supplier**	**Order Value**	**MMC Modular**	**Item/supplier**	**Order Value**
Outline specification			**Outline specification**		
Build type	**Other MMC MODULAR**		Build type	**Other MMC MODULAR**	
EPC rating	B		EPC rating	B	
Op Net-Zero carbon	No		Op Net-Zero carbon	No	
Demolition and ACM removal	Yes		Demolition and ACM removal	Mix	
Additional infrastructure	Unknown		Additional infrastructure	Mix	
Other			Other		
Notes			Notes	Average m2 build cost for 9no. schemes. Excludes feasibility, design and all planning costs, unknown specification beyond EPC B	
10 x 1 Bed flats	Total scheme cost	£2,836,211.00	**Total number of units and total costs unknown**		n/a
		£2,836,211.00			
	Average cost all units (no breakdown data available)	**£283,621.10**			
Funding	HE AHP	**-£1,050,000.00**	**Funding**	Unknown	
		£2,701,153.33			
	Average NET cost all Units	**£207,115.33**		**Average NET cost all Units**	**not available**
	Est. NET cost per m2	**£4,501.92**		**Average NET cost per m2**	**£2,387.65**

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Annex C Mid Devon District Council/Zed Pods Development Awards

2023-24

St Andrews House:

Winner (5 in total):

1. CN Specialist Awards: Project of the Year by a Specialist Contractor (subcontract up to £2m)
2. Construction Excellence CESW: Building Project of the Year (Up To £5M)
3. Construction Excellence CESW: Climate Action
4. Brownfield Awards: Best Public Sector Brownfield Project
5. BCIA Awards: Carbon Net Zero Initiative of the Year

Finalist (9 in total):

1. BCIA Awards: Residential Project of the Year
2. Unlock Net Zero: Building or development of the year
3. Inside Housing Awards: Best affordable housing development
4. Inside Housing Awards: Best healthy homes development
5. CN Awards: Low Carbon Project of the Year
6. Construction Excellence CESW: Residential Project of the Year (Up To £5M)
7. Offsite Awards: Social Housing Project of the Year
8. Brownfield Awards: Best Sustainable Brownfield Scheme
9. Building Innovation Awards: Most Innovative Affordable Housing Project

Shapland Place:

Finalist (1 in total):

1. Construction Excellence CESW: Modern Methods of Construction

2025 to date

Shapland Place:

Finalist (3 in total) – winners to be announced:

1. Construction Excellence CESW: Delivering Value
2. Construction Excellence CESW: Environmental, social and governance
3. Construction Excellence CESW: MMC

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ZED PODS Limited

Social Value Impact Economic Appraisal Report

In partnership with

Mid Devon DISTRICT COUNCIL

Project: St Andrews House, Cullompton

March 2025

Contents

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2 Background **2**

3 Social Impact **3**

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1 Overview

Economic appraisals form a critical part of the HMT Green Book business case methodology (being the standard approach adopted by local authorities and the public sector when seeking approval for their capital projects).

Public sector landlords require a robust evidence base to demonstrate the social impact of their development projects and evidence the wide-ranging benefits that a partnership with ZED PODS can achieve in designing and building zero-operational carbon MMC-led new developments.

The purpose of this economic appraisal is to appraise the social, environmental and economic costs, benefits and risks for the options of a project and identify the option most likely to offer the best social value for delivery of the project.

By preparing an economic appraisal that demonstrates, quantifies, and monetises the benefits of using ZED PODS housing solutions, alongside the whole lifecycle costs and reduced risks of the product, this robust evidence base will support public sector landlords in the development of their business cases for the project and demonstrate the best social value for money option when compared to other possibilities.

This economic appraisal following Green-Book methodology model has been prepared by Global City Futures, who are a team of Better Business Case Practitioner Accredited consultants (the Government's gold standard training accreditation) working in partnership with ZED PODS Limited.

2 Background

ZED PODS deliver revolutionary cost-effective, eco-friendly, affordable housing solutions through the utilisation of volumetric offsite MMC technology. Predominantly partnering with local authorities and other public sector organisations, ZED PODS look to not only optimise the use of underutilised and constrained public sector land but also keep the lowest possible utility and lifetime costs.

This social value economic model aims to quantify and detail the wider social benefits that are delivered both in implementation and through the lifecycle of the ZED PODS product. This will support Local Authorities to navigate their governance and approval processes by generating an output that can be used to inform the Economic Appraisal.

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3 Social Impact

A partnership with ZED PODS will have a wide range of positive effects on communities, individuals, and society at large, which can be demonstrated by this social impact economic model. The output of the economic model is a dashboard which provides a snapshot of the overall social impact of the project.

3.1 The Economic Appraisal

ZED PODS' bespoke economic appraisal model helps public sector landlords to identify and quantify the benefits arising from a development project. The model provides a robust evidence base to demonstrate the social impact and the wide-ranging benefits that a partnership with ZED PODS achieves. The economic appraisal conducted includes the four benefit classes as laid out in HM Treasury guidelines:

1. **Cash Releasing Benefits**
2. **Non-Cash Releasing Benefits**
3. **Societal Benefits**
4. **Unmonetisable Benefits**

When assessing the benefits of a project or policy, the HMT Green Book categorises them into four main types:

1. Cash-Releasing Benefits

These benefits result in direct financial savings that can be reinvested or used elsewhere. They involve actual reductions in expenditure, such as:

- Lower operating costs from energy efficiency measures
- A reduction in staff costs due to automation
- Savings from reduced procurement costs

These are tangible and measurable in monetary terms, directly impacting budgets.

2. Non-Cash-Releasing Benefits

These benefits generate efficiencies or cost savings, but they don't immediately free up cash for other uses. Instead, they may allow organisations to do more with the same resources. Examples include:

- Increased productivity from improved processes
- Reduced maintenance needs extending asset life
- Time savings for staff, allowing them to focus on other tasks

While they improve value for money, they don't necessarily translate into direct budget savings.

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3. Societal Benefits

These are broader benefits that improve social and economic well-being, often affecting communities, businesses, and the environment. Examples include:

- Reduced carbon emissions improving public health
- Increased employment opportunities supporting local economies
- Better living conditions that contribute to enhanced wellbeing

These benefits often justify public investment, even if they don't directly impact government budgets.

4. Unmonetisable or Qualitative Benefits

Some benefits are difficult to quantify in financial terms but are still important for decision-making. These include:

- Improved quality of life or well-being
- Increased biodiversity from environmental initiatives
- Enhanced reputation or public trust in government services

While harder to measure, these benefits should be considered alongside financial impacts when evaluating a project's overall value.

3.1.1 Discounting in Economic Appraisal

When evaluating a project or investment, we need to compare costs and benefits that occur at different points in time. However, money today is worth more than the same amount in the future due to factors like inflation, risk, and the opportunity cost of capital. Cost discounting helps us fairly compare future costs and benefits by adjusting them to reflect their present value. The key reasons for Using Cost Discounting are:

- **Reflecting Time Value of Money**
  - A pound today can be invested and grow over time, making it more valuable than the same pound received years later.
  - Discounting adjusts future values to account for this, ensuring fair comparisons.
- **Accounting for Risk and Uncertainty**
  - The further into the future a cost or benefit occurs, the greater the uncertainty.
  - Discounting reduces the weight of future values to reflect this risk.
- **Supporting Better Decision-Making**
  - Helps policymakers and businesses choose options that deliver the best long-term value.
  - Ensures that projects with early, high-value benefits are not treated the same as those with delayed or uncertain returns.

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How It Works

A discount rate is applied to future costs and benefits, reducing their value to what they would be worth today (Present Value). This ensures that long-term investments are appraised in a way that reflects real economic value. By using cost discounting, we make more informed and efficient investment decisions, ensuring public funds and business resources are used wisely.

4 Dashboard

From the economic model a dashboard has been developed to highlight the benefits of the project **"St Andrews House"**, which can be seen in Figure 1 below.

Location St. Andrews Estate, Cullompton, EX15 1JA

Client: Mid Devon District Council (MDDC)

Principal Contractor: ZED PODS Limited

Architect: ZED PODS Limited

Scope of works: Full turnkey package RIBA stages 0-7 undertaken by Zed Pods Limited

Project Description: St Andrews House, a pioneering six-unit zero-operational-carbon, social-rented modular homes on a challenging council-owned brownfield site (garage site) in Cullompton using Volumetric Modular Construction (Category 1).

Start Date (Design & Planning): August 2021

Start Date (Built phase) Summer 2023

Completion Date: Spring 2024

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Figure 1 Model Dashboard

Zed Pods Housing Model Benefits Appraisal

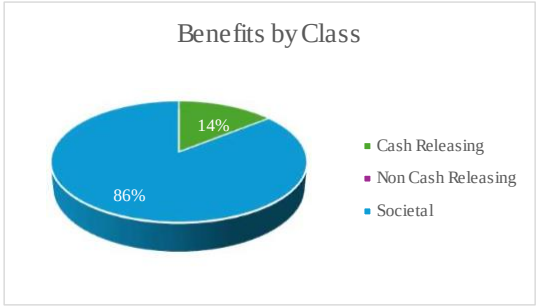
St Andrews

Project Details	
Region	South West
Development Start Year	2023
Practical Completion Year	2024
Acquisition Costs	£0
Development Costs	£1,000,000
Size Area (Ha)	0
Number of Units	6

Benefits

Total Discounted Benefits	£8,154,809

Benefit Class	Total	Total Discounted Benefits
Cash Releasing	£2,672,949	£1,164,562
Non Cash Releasing	£0	£0
Societal	£16,347,777	£6,990,247
Unmonetisable	£0	£0
Total	£19,020,726	£8,154,809



Metrics

Total Discounted Benefits	£8,154,809
Total Discounted Costs (assumed incurred Yr 0)	£1,000,000
Benefit / Cost Ratio	8.15
Net Present Social Value	£7,154,809
Payback Year	2028

Unmonetisable Benefits

Climate Resilience
Improvement of anti-social behaviour and increased community cohesion
Efficiencies in regard to brownfield site management
Provision of low carbon living training to residents

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5 Sources

5.1 GMCA Cost Benefit Analysis (CBA) Model

Source:

https://www.greatermanchester-ca.gov.uk/what-we-do/research/research-cost-benefit-analysis/

Description: The CBA model is used to understand the value for money provided by an intervention, particularly in terms of the use of taxpayers' money and the extent to which new delivery models might generate improved outcomes and related savings compared to 'business as usual'. The CBA model also enables the wider 'economic case' or public value to be articulated, quantifying economic benefits that accrue to individuals and businesses, and social benefits in terms of improved individual health and well-being.

5.2 Land Value Estimates

Source Land Value: https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2019

Description: MHCLG land value estimates for policy appraisal from 2019, valuations averaged by region and costs.

Source Indexation: https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator

Description: To inflate the MHCLG land values from 2019 to the 2024 base year.

5.3 Carbon Valuation

Source:

https://www.gov.uk/government/publications/valuing-greenhouse-gas-emissions-in-policy-appraisal/valuation-of-greenhouse-gas-emissions-for-policy-appraisal-and-evaluation#annex-1-carbon-values-in-2020-prices-per-tonne-of-co2

Description: Greenhouse gas emissions values ("carbon values") are used across government for valuing impacts on GHG emissions resulting from policy interventions. They represent a monetary value that society places on one tonne of carbon dioxide equivalent (£/tCO2e). They differ from carbon prices, which represent the observed price of carbon in a relevant market (such as the UK Emissions Trading Scheme).

5.4 Quality Adjusted Life Years (QALY)

5.4.1 Source Green Book QALY Valuation:

The Green Book (publishing.service.gov.uk) Page 87

Description: Monetary valuations of QALYs are available for the UK. The current monetary Willingness-to-Pay (WTP) value for a QALY is £74,000 in 24/25 prices. Further information on the basis for the value of a QALY can be obtained by contacting the Department of Health and Social Care. The amount of Value of a QALY effects should be discounted at the health rate of 1.5%, declining after 30 years. The value of 0.084 represents the improvement in Pain/Discomfort from Moderate to No Problem resulting from access to warm accommodation.

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5.4.2 Source QALY calculation:

https://www.gov.uk/guidance/cost-utility-analysis-health-economic-studies

Description: "QALYs attempt to combine the effects of your product on both mortality (how long people live for) and morbidity (how well people are). One QALY represents one year of life in full health. To calculate QALYs, you will need to measure:

- life years

- health-related quality of life (HRQL or QoL)

Life years are estimates of how far an intervention extends life. HRQL reflects an individual's perceptions of their own health, shown as specific health states or dimensions."

5.4.3 Source HRQL measure:

https://euroqol.org/wp-content/uploads/2024/01/ENG_value-set_STATA.txt

Description: "Measures QoL in 5 dimensions: mobility, ability to self-care, ability to carry out usual activities, pain/discomfort. Each dimension is rated at one of 5 levels: no problems / slight problems / moderate problems / severe problems / extreme problems or unable."

5.5 WELLBY

Source:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005388/Wellbeing_guidance_for_appraisal_-_supplementary_Green_Book_guidance.pdf

https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/personalwellbeingandprotectedcharacteristics

https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/methodologies/personalwellbeingfrequentlyaskedquestions

Description: WELLBY assesses the wellbeing impact for an individual. Improvements in the measurement of wellbeing measurement in the second half of the twentieth century have enabled consideration of wellbeing as part of the microeconomics of social welfare.

5.6 Prisoners Building Homes Programme

Source:

https://www.gov.uk/government/statistics/proven-reoffending-statistics-january-to-march-2022/proven-reoffending-statistics-january-to-march-2022

Description: Data shows the national reoffending rate, ranging from 25.1% to 55.5%.

Source: https://bristoltogether.co.uk/social-impact/

Description: Bristol Together CIC (an employer on the Programme and established in 2011 with the specific goal of employing and training ex-offenders) have supported over 130 former prisoners into employment

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through their work and have seen a reoffending rate of less than 10% for prisoners employed under their organisation

Source:

https://www.fpe.org.uk/the-cost-of-prisons/

Description: For 2021/22, the process costs of imprisoning someone typically costs £65,000

Source:

costs-per-prisoner-individual-prison-2022-2023.ods

Description: For 2022/23, once inside prison, the estimated cost of a prison place is £51,108 per year

Source Indexation:

https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator

Description: To inflate the MHCLG values from to the 2024 base year.

5.7 Cost of Retrofit

Source:

The-costs-and-benefits-of-tighter-standards-for-new-buildings-Currie-Brown-and-AECOM.pdf

Description: A report for the Committee on Climate Change

5.8 Fuel Poverty

Source:

https://assets.publishing.service.gov.uk/media/65ccecba1d939500129466a9/annual-fuel-poverty-statistics-report-2024.pdf

Description: 13% of households in fuel poverty

5.9 Roles in Construction

Source:

https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/averageweeklyearningsbyindustryearn03

Description: Average earning ONS - roles in Construction

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Report for:	**Cabinet**
Date of Meeting:	8 July 2025
Subject:	**Communications & Engagement Strategy**
Cabinet Member:	Cllr David Wulff, Cabinet member for Quality of Living, Equalities and Public Health
Responsible Officer:	Head of Digital Transformation & Customer Engagement
Exempt:	Not applicable
Wards Affected:	All
Enclosures:	Appendices 1 & 2

Section 1 - Summary and Recommendation(s)

The purpose of this report is to provide Members with the revised Communication and Engagement Strategy and accompanying Media and Social Media Policy.

Recommendation:

1. **That the content of the reviewed Communication and Engagement Strategy and the Media and Social Media Policy to be adopted as recommended by the Community, People and Equalities Policy development group.**

Section 2 – Report

1.0 Introduction

1.1. The Council has a duty to consult and engage effectively with residents, partners, employees and other stakeholders when deciding about future changes to services and new developments.

1.2. As a council we must offer value for money and customer satisfaction, therefore two-way engagement is an essential part of delivering our services.

1.3. This engagement must be delivered in an open and transparent way that is accessible to our audience.

1.4. Since the last strategy was revised in 2023 the Communications Team has continued to support services across the Council.

1.5. The team has supported the elections service, with the UK Parliamentary Election, Police and Crime Commissioner Election, Devon County Council Election and a number of town, parish and by elections.

1.6. Each year the Communications Team organises the Council's stand at the Mid Devon Show, which in 2024 focused on housing and leisure with support from both services.

1.7. A drive to improve engagement with our residents has also seen our engagement platform Let's Talk Mid Devon utilised further. In the two years since the last strategy was produced the platform has gained 592 registrations, been visited 18,801 times and had an engagement rate of 20%.

1.8. In the past year two years the team has attracted an extra 2,330 followers to our social media channels with our channels now having a total of 25,002 followers across the platforms.

1.9. GovDelivery is our e-bulletin system which is used to send out news stories and service changes. We now have 14,420 subscribers who regularly receive bulletins.

1.10. A web review is underway which has already streamlined content. This review will also consider the need for a new website design and hosting, but this project may be impacted by LGR.

1.11. The team has also launched two full resident surveys, in 2023 and 2024. The most recent survey showed 59.6% of respondents felt very or fairly well informed about the Council's work, an increase from 52.8% in 2023. We are continuing to explore ways to improve the survey response rate across the district.

1.12. A number of civic events, which have been organised by Democratic Services, have been supported by the Communications Team such as VE Day commemorations and Chairman events.

1.13. Most recently the Communications Team has taken on a large proportion of Active Mid Devon communication work, including managing social media pages and supporting the Active Mid Devon website, campaigns and branding.

2. Future

2.1. The Communications Team will continue to support services across the authority.

2.2. Upcoming projects in 2025 and beyond include the completion of a website review and potential for a new website, Local Government Reorganisation

(LGR) communications and further Active Mid Devon campaigns. The team will also be exploring the Council's use of AI as a communication tool for different services, ensuring it is used in a transparent and controlled way. The creation of a comprehensive emergency planning toolkit is also being planned.

It is anticipated this Communications Strategy and accompanying policies will be revised again in three years, potentially to coincide with LGR depending on timeframe.

Financial Implications: The revised strategy does not have any specific financial implications. Should the Council wish to implement larger scale communication changes, such as to develop a new intranet or website, or carry out a full rebranding exercise, this would involve a financial cost and these would be accompanied by a business case

Legal Implications: To ensure that all communication and methods of consultation are GDPR compliant and adhere to the Council's Single Equality Scheme.

Risk Assessment: Failure to engage with the Council's stakeholders could mean the Council's actions and objectives are not understood, risking reputational damage.

Impact on Climate Change: The Communication and Engagement Strategy includes work to support the Council's Climate Strategy and Climate Action Plan. The Council's communication utilises a digital first approach, contributing to a reduction of our carbon footprint from printing and postage. However, we always include alternative formats for those who need or prefer different communication channels.

Equalities Impact Assessment: Any consultation and communication channels would have regard to the Council's Single Equality Scheme.

Relationship to Corporate Plan: To ensure that our customers, staff, members and stakeholders are informed about Council services, news and changes through appropriate and varied channels.

SECTION 3 – STATUTORY OFFICER SIGN-OFF/MANDATORY CHECKS

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151 Officer
Date: 25.6.25

Statutory Officer: Maria de Leiburne
Agreed on behalf of the Monitoring Officer
Date: 25.6.25

Chief Officer: Stephen Walford
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 25.6.25

Performance and risk: Steve Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 29/05/2025

Cabinet member notified: yes

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. 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. No

SECTION 4 - CONTACT DETAILS AND BACKGROUND PAPERS

Contact: Jane Lewis, Communications and Engagement Manager

email: jlewis@middevon.gov.uk

Tel. 01884 234953

Background Papers:
Appendix one: Communication and Engagement Strategy 2025
Appendix two: Media and Social Media Policy 2025

Appendix One

Version Control Sheet

Title: **Communication and Engagement Strategy**
Purpose: **To set out how the Council will inform, engage and listen to our communities, in order for the Council to provide services which are fit for purpose for our customers and provided in a cost effective and transparent way.**

Owner: **Communications & Engagement Manager**
jlewis@middevon.gov.uk

Date: **May 2025**

Version Number: **1.0**
Status: **DRAFT**
Review Frequency: **Every three years or sooner if required. This date is suggested to coincide with LGR.**
Next review date: **May 2028**
Consultation: **This document will be sent out for consultation to the following:**
Community, People and Equalities PDG
Cabinet

Document History

This document obtained the following approvals.

Title	**Date**	**Version Approved**
Community, People and Equalities PDG*		
Cabinet		

*- Delete if not applicable

DRAFT

1.0 Introduction

The Communications and Engagement Strategy sets out how the Council will inform, engage and listen to our communities, in order for the Council to provide services which are fit for purpose for our customers and provided in a cost effective and transparent way.

Communication within the Council supports the Council's values which are People, Pride, Performance and Place as well as sharing the objectives and successes detailed in our Corporate Plan.

The Communication function is split into three key areas. These functions are:

- Community engagement
- Media relations
- Internal communication

This strategy works in conjunction with the Media and Social Media Policy, the Corporate Branding Guidelines and the Single Equality Scheme.

2.0 What we do

The core functions of the Communications Team are:

- Media relations and media monitoring
- Social media management
- Staff communication
- Community consultation and engagement
- Stakeholder consultation and engagement
- Branding and corporate campaigns
- Communication advice and training
- Website editing

The current structure of the Communications Team is a part-time Communication and Engagement Manager, a part-time Communications Officer and a full-time Digital Communications Officer. The team sits within the Digital Transformation and Customer Engagement Service and works closely with all service areas of the Council to provide a more effective approach to communication and engagement with our customers.

3.0 Who we communicate with

The Council has a wide audience in terms of demographics with a population of circa 82,800 spread over a largely rural area.

The majority of the work carried out by the Communications Team is with our customers who live in the district and with our staff who run our services.

DRAFT

This communication may be directly with these audiences or via the local media, partners or stakeholders such as local charities, parish and town councils, MPs and schools, as well as visitors to the area.

Communication with Mid Devon businesses is an important part of the Council's work, but this strand of communication is led by the Growth and Economic Development Team.

The Communications Team also supports Active Mid Devon with communication to its users and members, through campaigns, the Active Mid Devon app and their social media pages.

4.0 Our aim

The Council aims to provide communication which is:

- accessible and clear
- planned and proactive
- creative and engaging
- cost-effective
- positive and transparent

5.0 Community engagement

The Communications Team provides effective engagement channels which aim to give the local community a greater say and impact on the delivery of local services, while being better informed about the Council's work. Community engagement is about putting communities at the heart of their own local services. Effective community engagement is essential to ensure the services the Council operates are fit for the communities they serve.

In some areas of the Council there is a statutory consultation requirement when the Council has a duty to engage with the public, such as planning and licensing, which is supported by the Council's adopted Statement of Community Involvement 2020.

At other times the Council voluntarily and actively seeks out the views of the community to ensure the Council is delivering a high quality, cost effective service which meets the needs of the customer.

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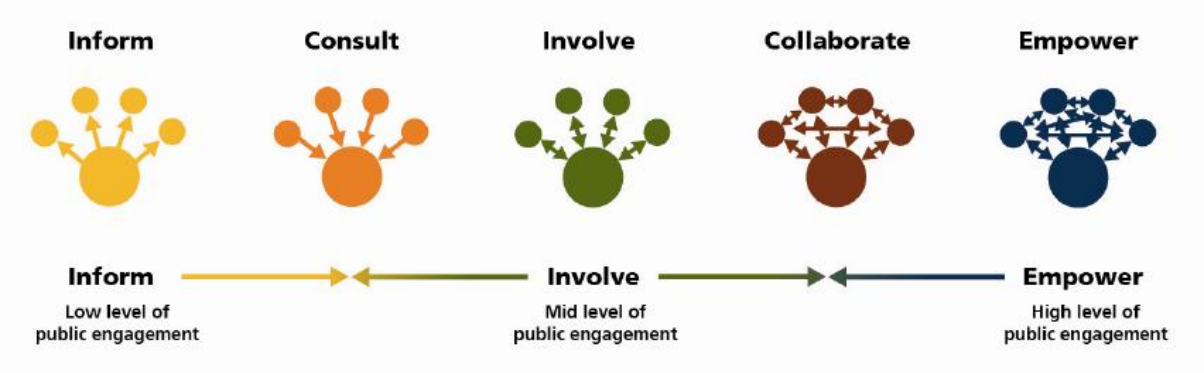
There are different levels of engagement and this should be considered when embarking on any form of engagement. The most appropriate method of engagement will depend on the desired outcome and audience.

Figure 1: Shows the different levels of engagement



To develop and improve community engagement the Council should:

- understand and respond to the needs of our customers
- plan and deliver better and more efficient services
- take transparent decisions based on evidence and be held accountable for these decisions
- build relationships with the local community and partners
- test out ideas and explore local issues
- measure the performance of the Council in delivering services

The Communications Team will support this by:

- Sharing information via multiple channels in multiple formats
- Exploring new partnerships, particularly with community and voluntary groups, as well as statutory/public sector partners
- Working with Members to promote the work of the Council and to receive feedback from constituents
- Encouraging service areas and Members to share news, upcoming events and consultation
- Giving the community and stakeholders clear means to express their views
- Listening to the feedback from our customers and acting on this feedback
- Working with partner organisations

Our community engagement methods will also support and adhere to our Single Equality Scheme 2025.

Our engagement can be split into three main areas: Customers, Members and Staff.

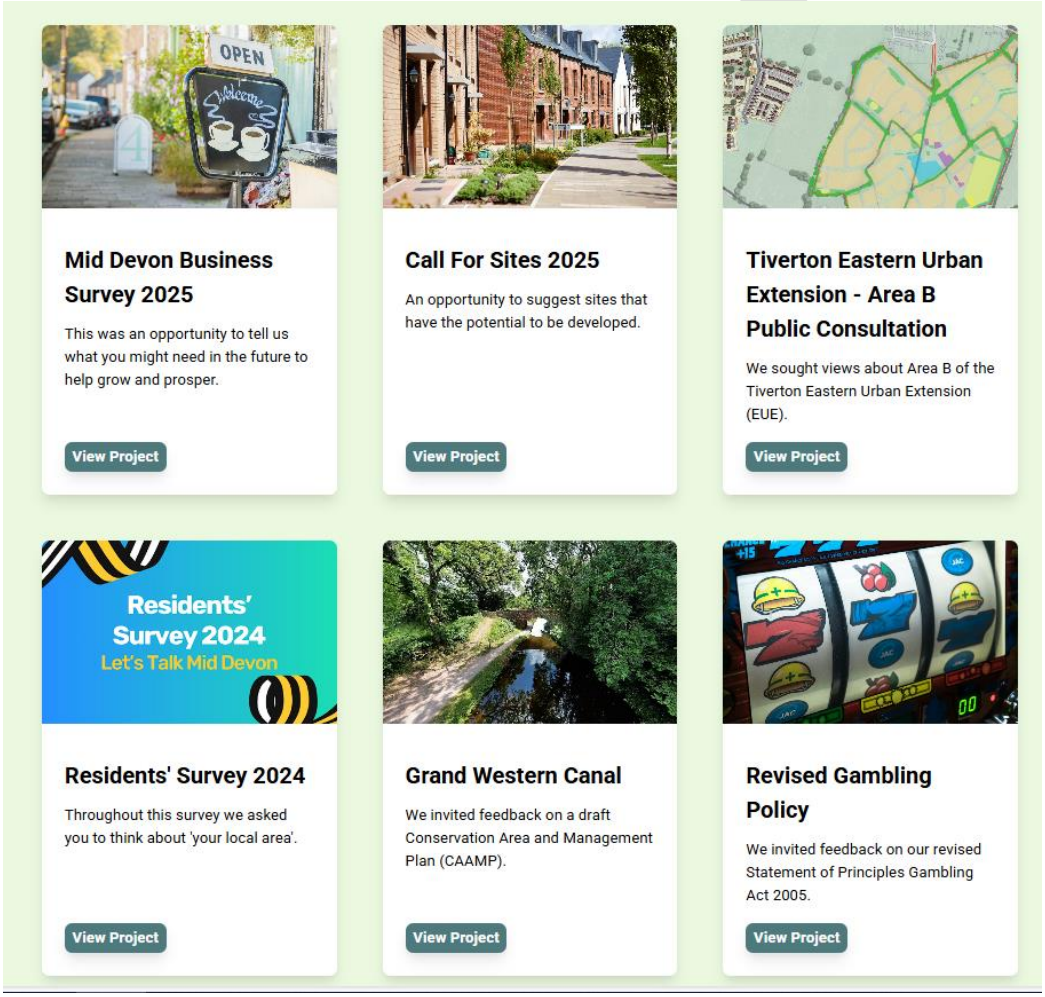
Customers

We share the work of the Council, its achievements and upcoming changes to services. We do this through a digital first approach, while ensuring all residents have

access to information by using a number of different communication methods including print, in-person events and online platforms.

The Council has an online engagement platform, Let's Talk Mid Devon which is steadily growing in use. The aim of this is to act as a hub for residents and businesses to communicate directly with the Council. The platform allows the Council to share information, ask questions, invite discussion and host forums directly with residents and businesses. It is a two-way communication tool that can be used for both statutory and non-statutory communication.

Figure 2: *Homepage of Mid Devon's Community Engagement Platform called Let's Talk Mid Devon*



Our communities already have a number of methods to engage with us including:

- An annual resident survey
- Service specific consultation exercises
- Service specific feedback processes
- An e-newsletter subscription service
- Multiple social media channels
- Business Forum
- Mid Devon Show event

- Specific in-person planning events
- Printed and online feedback forms

Elected Members

We aim to ensure our elected members, who represent our residents, are kept informed and engaged with our activities and we ask them to support this work by sharing information within their wards.

We will work closely with Democratic Services to:

- Share weekly key messages with councillors
- Share our news releases with all members
- Share media monitoring
- Host relevant councillor information on SharePoint and Teams
- Follow councillors' social media profiles on our official channels

We encourage Members to support community engagement, as they are the face of the Council in the community and can help ensure the Council's priorities reflect the community's wishes. It is important that our Members:

- Support and share council-run campaigns
- Share good news within their communities
- Feedback community ideas and issues
- Encourage participation with the Council
- Share community events and consultation

Staff Engagement / Internal communications

The Communications Team works closely with the Leadership Team, Corporate Management Team, Operations Managers and People Services to support staff communication across the organisation.

Our aim is to provide an internal communication system which promotes interaction and ensures staff at all levels feel valued and informed, giving them the best position to support the objectives and values of the Council.

We will do this by:

- Ensuring communication is shared with staff in a timely, easily accessible way, especially during periods of change, so that they feel better informed and engaged
- Helping employees see the connection between their job and the organisation's aims and objectives
- Recognising that different methods of communication are needed depending on the audience and message
- Encouraging staff to share good practice and expertise

- Encouraging senior management to listen to staff feedback and questions, and respond accordingly, creating a climate of two-way communication and improved levels of trust
- Facilitating free-flowing communication

The Council runs quarterly staff briefings which are hosted in a hybrid way, publish a fortnightly staff newsletter, send all officer emails when appropriate, host a staff consultation group and work with People Services to support regularly team meetings.

6.0 Media relations

The Communications Team works closely with existing and emerging media (local and national) to inform and engage the public about the work of the Council, ensuring the reputation of the Council is upheld and enhanced.

We will do this by:

- Generating news content
- Generating photo and video content
- Monitoring local and national news and sharing this information internally
- Liaising regularly with local reporters and editors
- Linking trending articles to the Council's work on social media
- Working closely with Members on issues that matter to them
- Using paid for adverts, when budget allows, particularly for campaigns

7.0 Media training

The Communications Team can support Members and officers who wish to learn or improve their interview skills and media handling, as well as support them with the setting up of social media pages. The team can also support Members by utilising external training providers for media training, particularly as part of the Member Induction Programme.

AI

The Council's first Artificial Intelligence Policy was adopted in 2025. This policy ensures users are aware of the methods the Council uses to manage AI. Users must comply with this policy to ensure appropriate use of AI tools. It links with other policies, including Corporate Data Protection, Information Security, ICT Acceptable Use, and Freedom of Information Policy.

The Council recognises that the use of AI is becoming more accessible and more frequently used by organisations and individuals in the work place. While the Council is in the early stages of developing its use of AI, the Council acknowledges there will be many opportunities to use AI in the future, generating benefits to the Council and our customers. It is also aware of the risks and need for robust governance with the use of AI. AI tools may be used in the future for tasks within the Council such as document improvements, meeting notes, report writing, data analysis, summarising

complex documents, translation, drafting communications, content creation, workflow management, and reviewing accessibility. However, it is important to remember that these tools will be used in a manner that complements professional judgement and expertise, without replacing them. Users remain responsible and accountable for the quality and content of any AI-generated output, regardless of how it is generated or used.

8.0 Emergency Planning

The Communications Team is on hand to support the Council during an emergency ensuring residents, staff, visitors and businesses are kept up to date in a time of crisis. The team is part of the Local Resilience Forum and liaises regularly with other local authorities within Devon. There is a mutual aid agreement in place with Devon County Council for use during an emergency if further communications resources are needed.

9.0 Corporate Branding

The Council recognises the importance of communicating in a way that is clear, consistent and uses Plain English. The Council has Corporate Branding Guidelines which should be adhered to when undertaking communications.

10.0 Accessibility

The Council must follow WCAG 2.1 AA standards on all public-facing websites and business applications that the public can use, such as apps. The standards required can be found here: https://www.w3.org/TR/WCAG21/

Any software procured / commissioned by the authority should be checked to ensure it meets WCAG 2.1 AA standards. We would be breaking the law if we purchase publicly visible apps / websites that don't meet this criteria.

The Communications Team and Web Developer manage a team of Content Editors / uploaders who are responsible for the accessibility of the content they upload to any Council-run website or where a website is hosted by a third party supplier such as ModernGov.

Officers in the Council have a responsibility to ensure content they would like in the public domain is accessible following WCAG 2.1 AA Standards.

11.0 Our success and accountability

It is important that our communities know how we are performing and what decisions we are making, so that they can challenge us and hold us accountable.

The Council is committed to working with communities to give them the chance to shape our priorities and to ensure they have the information they need to hold us to account for our performance.

This can be achieved by:

- Customer satisfaction surveys
- Tenant involvement
- Business forums
- Performance sharing
- Consultation exercises
- An open budget setting process
- A simple and transparent complaints process

We will measure communication and engagement success by:

- **Evaluating** website and digital analytics
- **Monitoring** media coverage
- **Increasing** our social media following and reach
- **Developing** partnership work
- **Implementing** an annual resident survey
- **Supporting** the annual staff survey
- **Developing** our two-way engagement platform Let's Talk Mid Devon

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Appendix Two:

Media & Social Media Policy

May 2025

Media and Social Media Policy

Version Control Sheet

Title:	**Media and Social Media Policy**
Purpose:	**To outline how we deal with media and social media and to provide advice and guidance to officers and elected Members**
Owner:	**Communications & Engagement Manager**
	jlewis@middevon.gov.uk
Date:	**May 2025**
Version Number:	**1.0**
Status:	
Review Frequency:	**Every three years or sooner if required**
Next review date:	**May 2028**
Consultation:	**This document will be sent out for consultation to the following:** Community, People and Equalities PDG Cabinet

Document History
This document obtained the following approvals.

Title	Date	Version Approved
Community, People and Equalities PDG*		
Cabinet		

*- Delete if not applicable

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1 Introduction

This policy outlines procedures for Mid Devon District Council officers and elected Members who may come into contact with the media. It supports the Council's **Communication and Engagement Strategy**.

This policy relates to social media, online versions of newspapers, blogging and citizen journalism, and any media policy must take into account both the traditional media (newspapers, magazines, radio and TV) and online digital media (including websites, blogs and social media).

It explains processes in relation to: proactive media relations; dealing with media enquiries; and dealing with posts on social media. It also provides guidance on a range of other media-related issues.

1.1 Our strategic aim

To work closely with existing media, and to develop relationships with new media channels, to inform and engage the public about the work of the Council, ensuring the reputation of the Council is upheld and enhanced.

1.2 Our policy statement

Mid Devon District Council recognises the value of the media and social media as a means of communicating information and messages to the public. We are committed to:

- transparent government;
- a positive working relationship with the media;
- always being open, honest and proactive in our dealings with the media and on social media, and;
- respecting the right of the media to report all views on any given topic.

2 Proactive media relations

Positive media coverage comes from pro-active media relations and the recognition of a good news story. Ideas for stories can come from both officers and elected Members. The drafting of press releases is undertaken primarily by the Communications Team. Creative and editorial support is also offered to services, however, they are free to submit their own drafts to the Communication Team where appropriate sign-off has already been sought.

2.1 Press releases

Media coverage is predominantly generated through the publication and distribution of press releases to:

- Increase public awareness of services provided by the Council and the functions we perform
- Explain to residents and council taxpayers the reasons for particular policies and priorities
- Improve local accountability
- Publicise forthcoming events
- Encourage participation in public consultations
- Explain changes to services
- Explain how the Council is dealing with issues of particular interest to local communities
- Share good news

2.1.1 Press release content

In the first instance services should contact the Communications Team for advice on submitting and writing a press release.

> ***Tip:*** Make sure that the relevant Cabinet Member(s) – and, for local issues, any Ward Members – are informed about what is happening and that a press release is being prepared (even if those Members are not actually quoted in the press release).

2.1.2 Who should be quoted in a press release?

Quote attribution depends on the nature of the press release, for example:

- The relevant Cabinet Member and the officer most directly involved in the subject may both be quoted – this gives the media a strategic/policy viewpoint, as well as the day-to-day operational viewpoint
- An officer
- A Member
- An external partner

If the press release provides only straightforward information, there's no need to include a quote.

2.1.3 Contact details on press releases

Generally only contact details for the Communications Team are included in the 'ENDS' of all press releases for follow-up enquiries from the press. This is to prevent journalists from contacting officers directly with future enquiries and to ensure all contact with the press is directed through, and logged with Communications.

Specific contact details may be included in relation to consultations, where a 'return path' is required for respondent enquiries.

> ***Tip:*** Where a press release covers a specialist subject for which follow-up inquiries from the press can only be answered confidently by a specific officer or Member, he/she should ensure they're available for contact by the Communications Team, the following few days after release.

2.1.4 Press release approval

For press releases written by the Communications Team, sign-off is sought from the relevant Corporate Manager and Cabinet Member. Where a press release has been written by a service directly, it's up to the author to agree sign-off with the relevant Service Manager or Corporate Manager and Cabinet Member before submitting to communications@middevon.gov.uk, for publication and distribution. However, we strongly advise services to contact the Communications Team in advance so that press releases are written and approved based on the Council's corporate style.

Before issuing to the media, the Communications Team will undertake checks for spelling, language and grammar.

Tip: Depending on the complexity of the subject matter, various people may need to agree the wording of a press release, such as:

- Any quoted elected Member/officer(s)
- The relevant service manager
- The Chief Executive, Director or Corporate Manager (for important corporate issues or important operational issues)
- The Leader of the Council or the relevant Cabinet Member (for important strategic issues or policy decisions)
- Relevant partner organisations

2.1.5 Press release distribution

Press releases from services which are time-sensitive and sent in advance, must contain *****EMBARGOED***** within the subject line, along with the specified date for release. Press releases must also be accompanied with an appropriate image at an industry standard resolution of ~300dpi. This is not only for publication online, but also for reprinting by the press, should they choose to cover the article.

All press releases are published onto the Council's website and then distributed via email to all media contacts, town and parish councils, and internally to Corporate Managers, Members and Customer First for info.

Press releases are further promoted through:

- social media posts published on the corporate Facebook and X , LinkedIn and Nextdoor pages, which link back to the story on www.middevon.gov.uk/news and;
- via e-bulletin to GovDelivery subscribers subscribed to the Council's email subscription service.

2.2 Other ways of generating coverage

The Communications Team can be consulted for advice on other aspects of media relations including:

- Planning media campaigns
- Setting up photo opportunities
- Media briefings and media launches
- Use of embargos (where the media is given advance notice but cannot publish until a specified date)
- Negotiating special features
- Improving webpages to support publicity
- Making better use of social media
- Increasing community engagement through GovDelivery
- Hosting community engagement on the Let's Talk Mid Devon platform

3 Reputational issues

3.1 Imbalanced or inaccurate media coverage

When media coverage of a particular issue is unduly negative and imbalanced, services can liaise with the Communications & Engagement Manager about how best to try to redress the balance. Action taken in response may involve:

- An email/phone conversation with the reporter
- A letter to the publication/Editor
- A request for a correction
- Communications & Engagement Manager, Chief Executive and/or Leader to meet and discuss with the Editor
- Generating further media coverage to move the story on in a more positive way

If we judge the following coverage to still be unfair or not based on fact, a complaint may be made to the Independent Press Standards Organisation (IPSO).

3.2 Confidential information

Leaking of confidential information, exempt agenda items and minutes to the media, is viewed seriously by the Council. The Freedom of Information Act 2000 (see also 4.3 below), allows certain information to be available on request to anyone including the media, unless the Council has a valid reason for not releasing it. Please refer to the Freedom of Information Policy on SharePoint for further information.

Occasionally, issues come to the notice of the media that involve staff or Members and aspects of their private lives or employment contracts. Our policy is not to comment upon such issues. Factual responses are permitted, for example: *“I can confirm that the employee is no longer in employment with Mid Devon District Council, but I am not able to discuss the situation in any greater detail.”*

The Communications Team will liaise with a member of the Leadership Team to discuss any response to the leaking of sensitive information.

3.3 Issues relating to employee relations

It is recognised that there will be occasions where the Unions wish to comment to the media in relation to issues rather than individual cases, on behalf of itself and its members.

There are mechanisms for complaining about issues or situations arising in the workplace and individual employees should refer to the procedures laid out in the appropriate policies (e.g. grievance, dignity at work/harassment and appeals procedure, whistle-blowing), available on SharePoint. If in doubt about how to raise concerns or which policy would be most appropriate for their needs, employees should seek advice and guidance from People Services.

3.4 Protecting the Council's reputation

While it is recognised that elected Members will want to comment on particular issues such as council policies and decisions, neither officers nor Members should bring the Council into disrepute or publicly criticise individual officers or associates.

4 Media enquiries

Every media enquiry can be used as a positive opportunity to get a message across to the public. Failure to provide a response explaining 'our side of the story' is an opportunity missed to ensure the subsequent reporting is fair and balanced. Our preference is to provide a response rather than a reply of ‘no comment’, which can come across as aloof, uncaring or that we have something to hide. If, for some reason we cannot comment in detail, for example, in relation to case work which is ongoing, we can usually provide a general comment and an explanation as to why we cannot go into detail.

4.1 Points of contact for media enquiries

4.1.1 Communications

The press and media personnel are encouraged to contact the Communications Team with any requests for comments, supporting information or interviews. Communications will liaise with the relevant Corporate Manager or service spokesperson to coordinate a response. The enquiry and proposed response is also cc'd to the relevant:

- generic department email if there is one;
- Cabinet Member;
- Leader of the Council (if controversial), and;
- Committee Chair (if in relation to an incident or comment made at a committee meeting).

The Communications Team will ensure all statements received are well written and submitted within the media's deadline. Final statements will be appropriately attributed, ensuring staff names and job titles are correct. Care is also taken to ensure that direct contact details for staff are not disclosed in any replies sent to the press.

Where a response from the relevant service is outstanding, we will respond to acknowledge receipt of the journalist's enquiry and to ask whether he/she is willing to extend the deadline for their enquiry. If no one is available, we will reply stating that the appropriate officer is currently unavailable for comment.

All contact between the press and staff is currently documented on the media reporting system CommsFlow for future reference and month-end analysis. This system will be replaced in the new CRM.

4.1.2 Officers and Members

The media may contact officers or Members directly. If the enquiry is straightforward, requiring only a factual answer, this can be answered there and then. However, the responding officer or Member must notify the Communications Team to record the enquiry onto CommsFlow (soon to be replaced with a tool within the CRM).

With the immediacy of news now being published predominantly online, officers and Members should be aware of the urgent need to respond within the deadline set by the enquiring journalist. It is within our mutual interest to respond positively and on time. The forging of good relations with the press allows us to build positive relationships and seek to ensure any future coverage is accurate, with either a favourable view, or, if the story is more negative, the opportunity to provide the council's perspective. Similarly, journalists will tend to be more willing to amend or withdraw a story if it's been reported inaccurately.

Note: Nothing in this policy precludes Members or political groups from speaking to or contacting the media. Members should make it clear to the media whether they are speaking:

- officially on behalf of the Council – in this case the Communications Team should be kept informed, *or;*
- officially on behalf of their particular political group, *or;*
- in a personal capacity.

Media training may be offered to all Members who are likely to be called on to speak to the media.

4.2 Media interviews and comments

4.2.1 Officers

It is up to Heads of Service and Corporate Managers to make arrangements for which officers in their teams can act as a spokesperson to provide comments or be interviewed by journalists.

The relevant Cabinet Members, should be consulted for advice at any time and be involved in drafting any media statements or preparing for interviews

that are highly controversial or where this is a significant reputational risk to the Council.

Staff are likely to be called on to comment on these issues:

Chief Executive / Leadership Team	Major corporate issues (and in situations where the Leader would normally respond but is not available within the timescale)
Corporate Managers	Corporate issues within their service areas (and in situations where the Cabinet Member would normally respond but is not available within the timescale)
Officers	To answer questions of fact and/or technical information within their areas of expertise and in relation to projects and initiatives they are involved in, but they will not be expected to do live on-air interviews unless they have received appropriate media training

4.2.2 Members

Members are likely to be called on to comment on these issues:

Leader	Strategic issues, key policy decisions, and other major corporate issues affecting the Council
Cabinet Members	Issues that come under their remit
Chairmen of PDGs	Issues their PDG is involved in
Chairmen and Vice-Chairmen of committees	Recent committee decisions
Chairman and Vice-Chairman of Scrutiny	Issues that Scrutiny raise and reviews that they are working on
Local Ward Members	Issues of particular local concern
Group Leaders	Issues that transcend politics, for example obituaries

4.3 Freedom of Information (FOI) requests

Some media enquiries are submitted as FOI requests, in which case the Performance, Governance and Health & Safety Team will coordinate the response in accordance with the applicable legislation. See Freedom of Information Policy in the governance area, within ‘Policies & Strategies’ on SharePoint.

5 Social media

In addition to posting proactive stories on Facebook, X, LinkedIn, Nextdoor, and YouTube, social media is now also used as a customer service channel, where we can respond directly to customers' questions, comments or complaints.

Customer enquiries are currently dealt with via the Communications Team but in future this area of social media may fall to the Customer Services Team. The new CRM may also affect how direct messages are answered by the Council and by whom.

5.1 Main corporate accounts

The Communications Team maintains and administers the corporate Facebook, X, LinkedIn, Nextdoor, and YouTube accounts. Where applicable, notifications in the form of questions, complaints and comments are dealt with directly by a member of the Communications Team. If the query is more complex, or concerns service policy, the relevant service is approached for information and guidance when forming an appropriate response.

Services should be aware there is no such thing as a deadline on social media; customer expectation is for a quick response – certainly hours rather than days – and leaving a post (particularly a negative comment or complaint) unanswered for more than a few hours gives the impression we are ignoring it.

5.2 Other service-specific accounts

A number of services have their own specific social media accounts and these include:

- Mid Devon Housing
- Tiverton Pannier Market
- Electric Nights Streetfood
- Active Mid Devon (one main page and three separate pages, one for each site)
- Culm Garden Village
- Mid Devon Business
- Visit Mid Devon

Staff within these services respond to their own notifications, however, with the use of Meta Business Suite for Facebook, the Communications Team can access and publish posts onto these pages, where urgent action is required and the relevant page editor is absent. (This does not apply to X, for which there is no Business Manager equivalent).

Any service wishing to set up a new social media account must discuss this with the Communications & Engagement Manager first. An officer/service must prepare a business case in conjunction with the Communication and Engagement Manager before setting up any new channel/page. This must include details about clear aims and reason for the channel, methods of management control and responsibility for content creation and direct messaging. Any new Facebook page must be set up correctly using Meta Business Suite which allows the Communication Team to monitor access appropriately. The overall approval for a new social media page/channel lies with the Corporate Manager for Digital Transformation & Customer Engagement & Digital Services.

The relevant service Operations Manager (or equivalent post) has overall responsibility for their social media content and users.

Two-factor authentication must also be used on all social media channels. This will have implications for users who access pages using personal devices. Under Facebook T&Cs all pages must be linked to a personal profile meaning personal accounts must use two-factor authentication.

All users must be included in the Council's Register of Social Media Access document. Each department will be limited to a maximum of five registered social media users per team/site, unless the Operations Manager (or equivalent role) has put a case forward for more users to Communications Team

It is also mandatory for all registered users to read the latest Media and Social Media policy each year via the LMS.

As a commercial arm of the Council, Active Mid Devon also runs a number of social media pages and channels. The leisure social media pages, and those staff accessing these pages and platforms, will follow this policy and it is recognised the overall governance of those accessing these pages is the accountability and responsibility of the Leisure Management Team.

5.3 Dealing with detractors

When dealing with detractors, all page editors and administrators using social media business accounts should avoid getting into an argument or inflaming a discussion. Officers will try to help in the first instance; if the user continues to post without engaging our offer of help, their posts will be ignored.

5.4 Deleting abusive or discriminatory comments

As a general principle we do not attempt to moderate posts on social media, as to do so could also open us up to accusations of censorship. However, we will remove any posts from our social media accounts that are abusive (for example, use of language, personal attacks on a particular named officer or Member, or discriminatory (for example, racist or homophobic).
As a last resort an individual account may be blocked if content posted continues to be repeatedly abusive or offensive.

5.5 Social media guidelines

The following guidelines set out the responsibilities, standards of behaviour and provide guidance to employees and Members using social media in a professional capacity, and things to consider when using social media for personal purposes.

All employees and Members should be aware of and adhere to the following policies, whichever is applicable:

- Dignity at Work
- Single Equality Scheme
- Member Code of Conduct
- Officer Code of Conduct
- Council Safeguarding Policy

5.5.1 Do

- **be responsible and respectful** at all times by adhering to the existing policies listed above
- **trust yourself** to use social media – the Council already trusts you to send an email on behalf of the organisation and the same applies for social media
- check your **privacy** settings – understand who can see the information you publish and your personal information
- **chat** informally with other users – use language and tone of voice that's consistent with your target audience
- **credit** other people's work, ideas and links

- **respond** to all comments and private messages as quickly and honestly as possible. Be personal and professional in your response – show empathy and a desire to find a resolution to problems where appropriate
- drive the conversation **offline if it's sensitive** in nature or likely to escalate – ask the individual to message you privately with more details and include your name so the customer knows who he or she is talking to.
- **listen** in on other pages to what's being said about the Council, its services and the local area, then join in on discussions, and;
- **share** helpful content and links signposting people to the appropriate service or authority to inform and grow your audience. If you're in any doubt about sharing any particular content, the best rule-of-thumb to follow is don't share it!
- seek advice from the communications team or legal services if you are unsure**,** it's there to help you
- **add value** by creating content that educates and spreads awareness about Council services. Include positive stories encountered whilst on the 'day job' and news-bites with perspective to show the human side to public services
- align your posts with the **Council's purpose and values**
- **seek permission** to publish any information, report or conversation that is not already in the public domain.
- **respect copyright** when linking to images or other online material – obtain owner permission and provide appropriate attribution when using images that aren't your own, and make sure you purchase the correct license for any stock images used
- respect the pre-election period (see local.gov.uk/our-support/purdah)
- **ask** your followers questions to glean valuable insights (but ensure there's a clear and resourced return path for respondents to leave their feedback and make sure you share the results with them)
- **monitor and evaluate** the success of your activity.

5.5.2 Don't

- post content which will **embarrass** the Council or yourself
- **reduce your credibility** by posting your every personal thought – especially if you're complaining
- **moderate posts** unless they are abusive – blocking someone or deleting their posts without just cause will incur accusations of 'censorship'
- use council **jargon** or corporate speak
- **ignore comments** and private messages (unless engaging will inflame a situation or the comment is clearly politically motivated, or the person commenting has received an answer multiple times to the same question)
- say anything you **cannot substantiate** – if you don't know the answer, let the individual know you're looking into the matter

- cite or reference customers, partners or suppliers **without their approval**
- **argue** with customers or inflame a discussion
- refer customers to **another channel** such as email or telephone – if they've contacted you via Facebook, you should respond in kind. The exception would be sensitive topics such as comments in relation to planning applications, etc.
- follow or share **political opinions** or groups which could otherwise compromise the Council's impartial service to the Government
- **broadcast** or talk at people. Users who post information which is mostly information-sharing have twice as many followers than those who post mostly relating to themselves
- **cover up** mistakes, be honest and you'll get more respect for it in the long run
- disclose **personal information** – to do so would be in contravention of the Information Security Incident Policy and the social media platform's rules
- **assume** that social media will look after itself – you will need to invest time, enthusiasm and energy to make it work.
- **share your passwords** with anyone other than the Communications Team.

5.6 Training

One-to-one staff or Member training to use social media can be provided by the Communications Team on request. Such requests should be emailed to communications@middevon.gov.uk. A Social Media Guide for Members and Staff is also available.

6 Other issues and special circumstances

6.1 Emergencies and out-of-hours contact

In the event of an emergency situation affecting multiple agencies, a Media Cell will be setup by the lead agency to manage communications and the press. For more information, please refer to the Devon Emergency Planning Service (DEPS) Incident Response & Recovery Plan on SharePoint.

In the event of the media contacting the Council outside normal office working hours and if deemed an emergency, contact details for the Communications & Engagement Manager and Communications Officers are listed in Part 5 of the DEPS Incident Response and recovery Plan. The Communications & Engagement Manager will decide if and what response is required. If a response is required, they will contact the relevant officer (Chief Executive or head of service) and/or lead Member.

6.2 Court cases

The Council will occasionally launch prosecutions and will want to use successful outcomes of court cases to deliver a message to the public. The best way of doing this is by issuing a press release, or prior notification to the media of an impending court case. The relevant Corporate Manager should be consulted.

6.3 Photography and child protection

As outlined in our Safeguarding Children and Adults at Risk Policy and Procedures, officers, Members and volunteers should be vigilant at all times. Any person using cameras or videos within Council premises and at events or activities which involve children and young people, should be approached and asked to complete a Photography Consent Form (see **SharePoint >> Communications >> External Communications**).

Guidance for commissioning professional photographers or inviting the press to cover Council services, events and activities

- Ensure that you make your expectations clear in relation to child protection

- Check credentials of any photographers and organisations used
- Ensure identification is worn at all times, if they do not have their own – provide it
- Do not allow unsupervised access to children or young people or one-to-one photographic sessions
- Parents must be informed when photographs of their child or young person may be taken at activities or events, and parental consent forms need to be signed agreeing to this
- It is recommended that the names of children or young people should not be used in photographs or video footage, unless with the express permission of the child or young person's parent

6.4 Data protection

Personal information and data protection
The Data Protection Act 2018 (DPA) determines the way in which the Council obtains, holds, uses, releases and disposes of personal information. Under the DPA you are entitled to request copies of your personal information that is held by us.

Freedom of information
The Freedom of Information Act 2000 (FOIA) provides a right of access to information held by Public Authorities. Under the FOIA you are entitled to request disclosure of any information that is held by us. However, some of the information held may be exempt. The FOIA also places an obligation to pro-actively publish certain information through the Council's Publication Scheme.

For guidance, see Data Protection Policy or contact our Corporate Performance and Improvement Manager.

6.5 Elections

During elections, all publicity referring to a political party or anyone standing for election will – except as in the following paragraph – be suspended between the publication of a notice of election and polling day.

Members will not be quoted in press releases during this period unless it is a Member holding a key political or civic position commenting on an emergency

or an important event outside the Council's control and where there is a genuine need for a response by a Member. For further information concerning the publicity restrictions observed by Local Authorities during the pre-election period previously known as 'purdah', please refer to local.gov.uk/our-support/purdah.

6.6 Filming, recording and use of social media at Council meetings

All media, including radio and TV journalists, and members of the public may attend Council, Cabinet, PDG and committee meetings (apart from items where the public is excluded). 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.

7 Media monitoring and evaluation

7.1 Monitoring

7.1.1 Newspaper and online mentions

The Communications Team monitors local media, notably Mid Devon Gazette, Crediton Courier, Devon Live, and BBC.

Any articles referencing the Council, its staff or Members are summarised and sent to the Leadership Team, relevant Corporate Managers and Members for information.

For any printed or online reporting which is found to be baseless, either the Communications & Engagement Manager or relevant Corporate/Service Manager can decide whether any follow-up action is required in response (see also 3.1 above). Any coverage generated – whether from a press release or by responding to a media enquiry – is collated and reported monthly to the Leadership Team for evaluation.

7.2 Hard copy press cuttings

Because it is prohibitively expensive, we do not have the necessary NLA Media Access licence to permit us to photocopy or electronically scan press cuttings. Officers and Members should therefore not make or store any copies of press cuttings for any purpose, as to do so would be breaking copyright law. The originals of articles may, however, be cut out from newspapers and kept.

7.3 Social media monitoring

The social media channels for the following areas are monitored by the Communications Team:

- Media organisations (both local and national)
- Community news and forums (including some groups members may be part of)
- Local what's on pages, partners and charities
- National partners, charities and government organisations

References to the Council or Members are flagged and reported as above where seen. Note that social media monitoring can be a full-time role and there is not currently the capacity within the Council to carry out this task in this way.

7.4 Web Alerts

Monitoring of the web for accessibility is carried out on a quarterly basis using Sort Site.

The Communications Team receive Google Alerts to detect changes in content for predefined search terms. Terms have been entered for the Council, its premises, ongoing plans/developments, and names of key staff, Members and vexatious complainers. Additional search terms are added as and when appropriate, or the need arises. Any detections are automatically emailed to communications@middevon.gov.uk, then forwarded to the relevant staff and/or Members, as above.

Report for: **Cabinet**

Date of Meeting:	8 July 2025
Subject:	**Waste Depot Remodelling**
Cabinet Member:	Cllr Josh Wright, Cabinet Member for Service Delivery and Continuous Improvement
Responsible Officer:	Andrew Jarrett, Deputy Chief Executive (S151)
Exempt:	N/A
Wards Affected:	All
Enclosures:	Appendix 1 – Site Plan for proposed changes Appendix 2 – Indicative New Office complex option

Section 1 – Summary and Recommendation(s)

To present proposals to remodel the waste depot to meet new Environment Agency permit regulations and requirements, and enable the service to accommodate increased volumes and waste types as well as have the capacity to further increase its recycling portfolio.

This report seeks approval for the high-level plan with delegation sought to progress the set out schedule, specify the detail and subsequently implement the changes.

Recommendation(s):

That Cabinet consider the proposed remodelling of the site, and

1. **Give delegated authority to the Deputy Chief Executive (S151) to progress the works as planned. Noting, any subsequent specific spend or contractual awards in line with key decisions thresholds will be brought back to Cabinet for agreement.**
2. **Agree the purchase of a new Modular Office complex, to be specified, up to the value of £250k.**
3. **Agree the alignment of the leases of the various existing units to end on the same date as that recently agreed for the new car park site – 7 November 2039.**

Section 2 – Report

1.0 Introduction

1.1 The Environment Agency (EA) announced on the 18 December 2024 that it has consolidated 28 existing “standard rules permits” into 8 new “standard rules permits”. These changes come into force on 19 June 2026. This update aims to streamline permitting processes and aligns them with modern standards.

1.2 To meet the new requirements some significant changes are required to the Waste Depot; the main changes being certain elements of Waste and Recycling require storing undercover, that the recyclate is securely stored and with some recycling materials needing to be baled. This demands that the service have sufficient capacity and space to ensure service delivery is legally compliant. This requires a new building to house the materials.

1.3 The proposals regarding the remodelling of the site will also help increase our storage capacity at Carlu regarding recycling materials. This will include a considerable increase in our undercover storage capacity, which will allow the housing of extra baled bay areas. This will give us the future provision to store flexible/soft plastics, disposable nappies and other potential recycling initiatives.

1.4 This is vital to help the Council further build on and sustain the excellent performance it has achieved regarding enhancing its recycling rate and reducing its residual tonnage over the last two years. This work has seen Mid Devon catapulted into the top 5% of national performance as well as gain recognition from OFLOG and be shortlisted for a national LGC award.

1.5 A paper setting out the proposed future direction of travel and appetite regarding additional recycling activity will be taken to the next Service Delivery and Continuous Improvement PDG in September. This will then inform the future permit variation application that will be required to be sent to the EA regarding the remodelling exercise so future changes are processed in the same submission (thus saving time and expense).

1.6 This report outlines at a high level the plans to remodel the depot to meet the permit requirements and enhance and future proof the operation. The Council has a firm deadline of 19 June 2026 to meet the new regulatory guidance. Following approval of the plans that are presented in this paper, subsequent planning, building and preparation work is required over the coming 10-month period to ensure everything is in place well before the deadline.

2. Changes to the EA Regulations

2.1. The EA published legal guidance that Waste and Recycling services need to both abide to and meet for its collection services to be permitted and carried out after June 2026. Recycling services that do not comply with this guidance may be disrupted, with alternative tipping arrangements needing to be sought that are highly likely to be significantly more expensive. The Council needs to take proactive action to ensure that the primary service experienced by all of

the District's residents continues at the highest standard, without public health risks that arise from collection services being affected and/or delayed. This is a situation that we wish to avoid.

2.2. The new permit which affects the Council is:

SR2022 No 4: Non-hazardous waste recycling with asbestos, hazardous batteries, cable, and WEEE storage, which can be found here: https://www.gov.uk/government/publications/sr2022-no-4-non-hazardous-waste-recycling-with-asbestos-hazardous-batteries-cable-and-weee-storage/sr2022-no-4-non-hazardous-waste-recycling-with-asbestos-hazardous-batteries-cable-and-weee-storage

Currently the dry recycling side is covered by several waste exemptions, and only the Waste Transfer Station (Black bags, food waste and green garden waste) require an environmental waste permit.

2.3. The new permit requirements stipulate that certain elements of Waste and Recycling require storing securely undercover, with some recycling materials needing to be baled. To ensure the operation is legally compliant, this requires additional capacity and space as well as the necessary fire protection and suppression in place and appropriate containment and drainage for the foul water.

2.4. The Council will need to vary its current permit to carry out new recycling activity, for example pots and pans, disposable nappies and coffee pods so this project will allow the service to bring everything together at the same time. A pre-approval application for the permit to the Environment Agency will be made once the plans for the Carlu site redevelopment have been approved and finalised.

3. The Operational Benefits

3.1. The requirement to cover the recyclate bales offers an opportunity to expand the current depot storage capacity, both in terms of volume and the range of materials stored, giving a level of future proofing. For example, this would enable the permanent collection of materials included within recent trials, and/or allow us to undertake new trials collecting alternative materials. The additional storage capacity will accommodate the required mandatory collection of soft plastics and wrapping from 1 April 2027 for example.

3.2. The changes are also financially beneficial in the longer term. The higher the level of recycling that can be achieved, the less residual waste goes into Energy from Waste – lowering the disposal charges. It also means more recyclate can be sold, increasing our direct income but the recycling performance also feeds into other funding streams like the outgoing Shared Saving Scheme with Devon County, or the new incoming Extended Producer Responsibility (EPR) arrangements.

4. The Planned Works

4.1. At this stage, the plan is at the high-level outline stage. The requirements are known and the proposals included within this report are made with the backing of independent external advice. However, there are a number of technical requirements that require further refinement. These include the detailed specification of the new weighbridge, the new fuel station, the fire identification and suppressant requirements, along with foul water management (containment and separation ahead of disposal).

4.2. As outlined above, there are a minimum set of works required to enable the Council to meet the permit requirements. At a broad high-level, the minimum requirements are:

- Raise Bay walls in the Recycling Transfer Station to allow one metre of “free board” at the end and above the materials stored, making them sufficiently fire proof to contain the fire for 2 hours;
- The Recycling Transfer Station to be extended to allow for storage bays for baled products, with associated fire protection and water management – this requires planning approval and the landlord is progressing this and will undertake the build as it will remain in their ownership after the lease expires;
- The creation of a new building to accommodate two additional storage bays and the Waste Electrical and Electronic Equipment (WEEE) skip and battery storage, again with associated fire protection and water management. This new storage building will be built by the Council and could be transferred to the landlord at the end of the lease, or potentially might need to be removed upon leaving the site;
- Creation of a sampling station.

4.3. In addition, there are a raft of operational changes that will benefit the service by increasing efficiency and capacity, which in turn drives increased income and enables operations to be fit for purpose for the medium term (15 years minimum). These include:

- Expansion of the overall depot operation– achieved through securing the new unit on the business park – see Cabinet decision 15 October 2024. This is now the car park;
- Re-use the old car park to accommodate the Office complex and Grounds Maintenance service;
- Re-use the space vacated by Grounds Maintenance to accommodate the new weighbridge, new fuel station and wash-down area;
- Re-use the vacated weighbridge area to accommodate the welfare units;
- Alter the traffic management system on the site, switching the current entrance gate to be the exit, and using the Grounds Maintenance entrance as the overall entrance. This enables the current exit to be blocked off to improve overnight vehicle parking;
- The existing bin store, currently within a separate unit on the business park, can be moved onto the main site and the unit released, thus saving money;

- Separately to this project, but in conjunction, the service will be replacing the baler, which will improve operational efficiency by compacting the bales more and thereby allowing the storing of more material.

This high-level summary of the planned remodelling works does not do justice to the complexity and scale of the project. A plan of the remodelled main site is included within **Appendix A**.

4.4. There are a couple of decisions at this point.

4.4.1. The first is in respect of the Office complex. There are two choices:

(1) Move the existing (dated) modular office blocks and update as far as possible. This may yield another 5 – 10 years use at a broad cost of circa £50k. Irrespective of the modernisation of the buildings, they are very unlikely to last the medium term (15 years) aim of the project. There will need to be a degree of decanting and the offices will not be usable during the move and updates, leading to temporary costs to hire replacements.

Or

(2) Buy new modular offices fit for the future at a cost of around £250k. **Appendix 2** gives a guide to what is available. The existing office complex could be sold at a minimal price (circa £10k). This also offers significant benefits for the timeframe of the project, enabling the new offices to be built and positioned while the existing offices are in use. Further expansion would be possible if required in the future.

This key long-term investment decision gives the service the opportunity to significantly improve the staff office accommodation and therefore improve the staff welfare. These new purpose built offices will be more flexible, modern and energy efficient with an appreciably elongated economic life that will provide a significant uplift on the current arrangements and ensure this is future proofed on a similar basis as the other site improvements.

In addition, should the need arise, the increased capacity provides greater flexibility for wider Business Continuity, for example if Phoenix House were not operational, an emergency duty or recovery team could be based there in the interim.

4.4.2. The second is to grant approval to align the leases of the various units on the site, so that there is security of the site for the medium term. This project is aiming to future proof the operation for a period of 15 years. Therefore, the leases need to cover that period. Approval is therefore sought to align the end dates with the latest lease (for the new car park) ending 9 June 2039.

5. The Timeline

5.1. The legal requirement is to have applied for the new permit by 19 June 2026, although it is planned to be done well before then. The above tasks are required to be in place in order to be able to apply for the permit, and given the complexity of some tasks, the timeframe should be considered as manageable, but tight. For example, a significant unforeseen delay in achieving the planning approval for the extension could prevent the build completing in time.

5.2. The summarised timeline, or critical path, for this project is as follows:

- July 2025 – Decision point to approve the plan (this report);
- ASAP – Landlord to submit the planning application for the extension;
- End of July 2025 – final detailed specifications to enable contracts to be tendered;
- End of September 2025 – Complete moves to old car park area - Grounds maintenance and Office Accommodation, clearing space for extension. Reposition welfare units;
- October 2025 – March 2026 – build timeframe (allowing good flexibility) for:
  - Recycling Transfer Station extension – expected to take circa 3 months
  - New Storage Building – expected to take circa 3 months
  - New weighbridge, new fuel station and wash-down area; – expected to take circa 3 months
- April / May 2026 – contingency for any overruns
- June 2026 – have submitted permit application.

5.3. As far as possible, the project will try to avoid any disruption to normal service delivery. Fortunately, much of the project is within areas that can be cordoned off – both the extension and new storage building are on one side of the depot, and the weighbridge, fuel station and wash-down area is on a discrete area on the other side of the site. Both aspects of the development can be actioned at the same time. However, there will be instances where disruption is inevitable. These will be managed appropriately, with as much work as possible completed out of normal working hours. Full communication with appropriate stakeholders will be undertaken.

6. Project Management and Governance

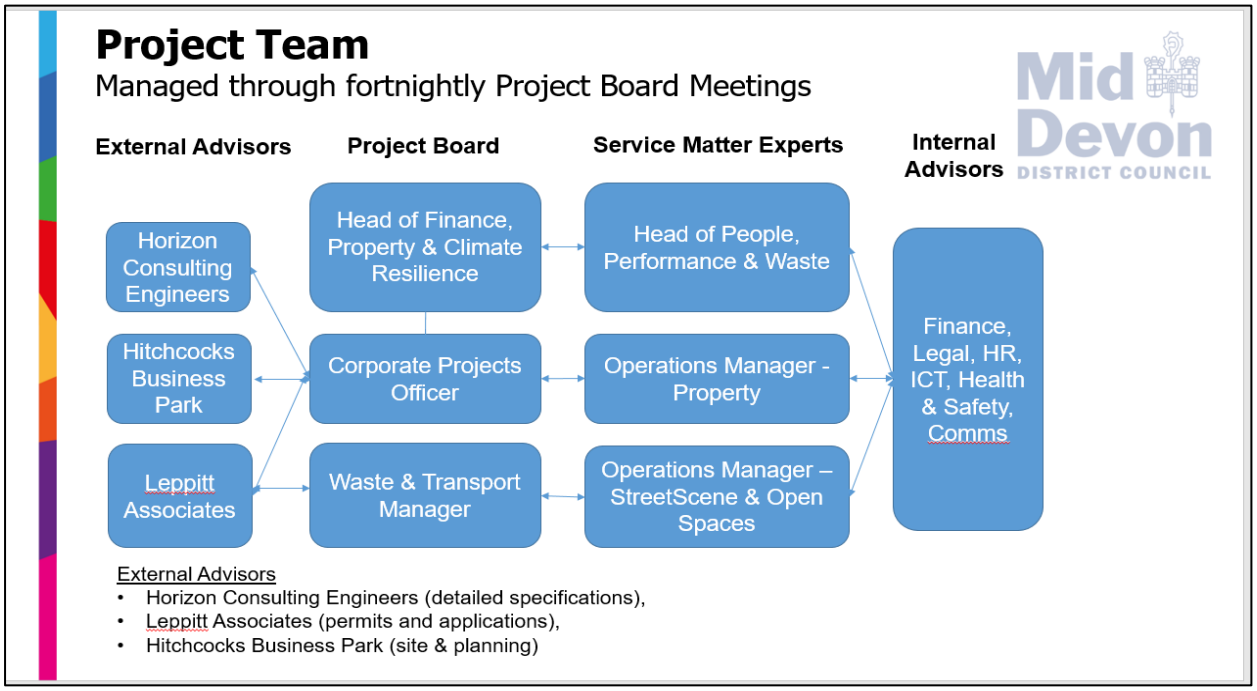
6.1. This is a significant and critical project for the Council. The implications for failing to secure the new permit will be costly and harmful for the Council's reputation. As such, strong project management and governance is in place.

6.2. There is a live Project Initiation Document outlining the critical elements of the project, including the requirements and stakeholders, the broad costs and benefits, the risks, the timeframes and project management.

6.3. A Project Board has been set-up, chaired by the Head of Finance, Property & Climate Resilience. There is a dedicated Project Manager and subject matter

experts from Waste and across the Council are involved. External advice is garnered through Horizon Consulting Engineers, for technical detail in respect of the site layout, traffic management, and specifications of the weighbridge, fuel station and wash-down area. Leppitt Associates are advising on the permit requirements and application. The landlord is fully engaged and supportive and is delivering the extension to the Recycling Transfer Station.

6.4. The Project Board operates like this:



7. The Costs

7.1. At this stage of the project, the majority of costs are estimated, based on data gathered and expert advice. As such, the current forecasts are broad and prudent. However, as the detailed specifications are finalised over the next few weeks, the greater clarity and certainty will help further refine the cost and timeline.

7.2. The main cost drivers within the project are:

Ref	Description	Approximate Value £
1	Relocating Ground Maintenance and Welfare Units.	£50k
2	Relocating and refurbishing Office complex OR Purchasing new modular Office complex.	£50k OR £250k
3	Groundworks to area accommodating Weighbridge, Fuel Station and Wash-down	£250k
4	New Weighbridge, Fuel Station and Wash-down	£150k
5	Extension to Recycling Transfer Station	£500k*
6	New Storage Building	£250k
7	Extending the bay walls	£100k
8	Other Costs	£100k
9	Contingency	£100k
	TOTAL	**£1,750k#**

* This cost could be paid up front, or added to the annual lease and paid over 15 years

\# Based on recommended purchase of new office complex and up-front payment of extension

~ This does not include the cost of the new lease taken on the new car park (£53k pa) or any changes to the rental costs from aligning the lease timeframes, or the cost of the new baler being considered separately.

7.3. There is funding set aside within the 2025/26 Capital Programme of £3,562k, of which £3,500k (based on previous assumptions of depot relocation) is assumed to be funded from borrowing, and £62k from earmarked reserves. Clearly, the full amount will not be required, thus reducing the assumed capital financing costs for future years.

7.4. As at the end of March 2025, there were specific waste service earmarked reserves of £777k, and general property sinking funds of £1,528k. In addition, during 2025/26 the first Extended Producer Responsibility grant payment of £927k is due, which has not been allocated yet.

7.5. Depending on whether a new office complex is purchased, and whether the extension to the Recycling Transfer Station is paid upfront or added to the annual lease cost, the project could be funded from existing resources, without the need for borrowing. The funding route is a treasury decision that will be made by the Deputy Chief Executive (S151).

8. Conclusion

8.1. The Street Scene service (Waste and Recycling) needs to reconfigure and increase capacity at its Carlu Close depot to meet future Environment Agency (EA) legal requirements (including the need to store some waste and recycling under cover) but also ensure it has sufficient operational space and storage and to make it fit for the future.

8.2. The works required to gain the new permit are unavoidable. However, this is a prime opportunity to go beyond the minimum requirements and enhance the service, enabling greater storage capacity and making it future proof.

8.3. Approval is sought for delegated authority to progress this outline plan, clarifying the detail and specifications required, and to implement the design.

Financial Implications
The financial implications of the works required are included within the 2025/26 Capital Programme. However, the funding assumptions can be revised with the costs being met from a combination of the new Extended Producer Responsibility grant and earmarked reserves. An option is available to include the cost of the Recycling Transfer Station extension within the revised lease, reducing the upfront cost and spreading the payment over 15 years.

Increased recycling should lower residual waste disposal costs, generate greater income both directly through the sale of recyclate materials, and grant funding.

Legal Implications
The EA published legal guidance that Waste and Recycling services need to both abide to and meet for its collection services to be permitted and carried out. Recycling services that do not comply with this guidance may be disrupted.

Risk Assessment
There are a raft of risks associated with this project, ranging from health & safety, financial, legal (failure to secure the permit), to the availability of resources (internal and contractors). A risk log has been created and will be reviewed regularly by the Project Board, with any escalations required highlighted to Leadership Team.

Impact on Climate Change
This programme of work has a very clear and direct link with our Climate Change portfolio and the need to further reduce our carbon footprint and meet our net zero commitment. The Bin-It 123 initiative is both affected and contributed to by every resident in the District and so being able to deliver our service in a legal and compliant way (and that meets the EA guidance) is vital.

The opportunity will be taken to maximise the inclusion of Solar Panels on the new roof space created. Additional EV charging points will be included to enable more use of electric vehicles, noting that realistically it is not going to be possible to operate an electric fleet within the waste service for some time. The new office complex (if agreed), has increased insulation and a good energy rating.

Equalities Impact Assessment
No equality issues identified for this report

Relationship to Corporate Plan
The work of our Waste and Recycling collection team is a clear strategic priority in our Corporate Plan. In addition to looking to further reduce residual tonnage and increase our recycling rate through cementing Bin-It 123 and best education/enforcement

practice, elected members are keen for further recycling initiatives to be introduced. This project will facilitate the achievement of higher recycling rates and increased volumes and types of waste collected (Corporate Priority 5.2).

Section 3 – Statutory Officer sign-off/mandatory checks

Statutory Officer: Andrew Jarrett
Agreed by or on behalf of the Section 151
Date: 24/06/2025 via Leadership Team meeting

Statutory Officer: Maria De Leiburne
Agreed on behalf of the Monitoring Officer
Date: 24/06/2025 via Leadership Team meeting

Chief Officer: Stephen Walford
Agreed by or on behalf of the Chief Executive/Corporate Director
Date: 24/06/2025 via Leadership Team meeting

Performance and risk: Dr Stephen Carr
Agreed on behalf of the Corporate Performance & Improvement Manager
Date: 24/06/2025

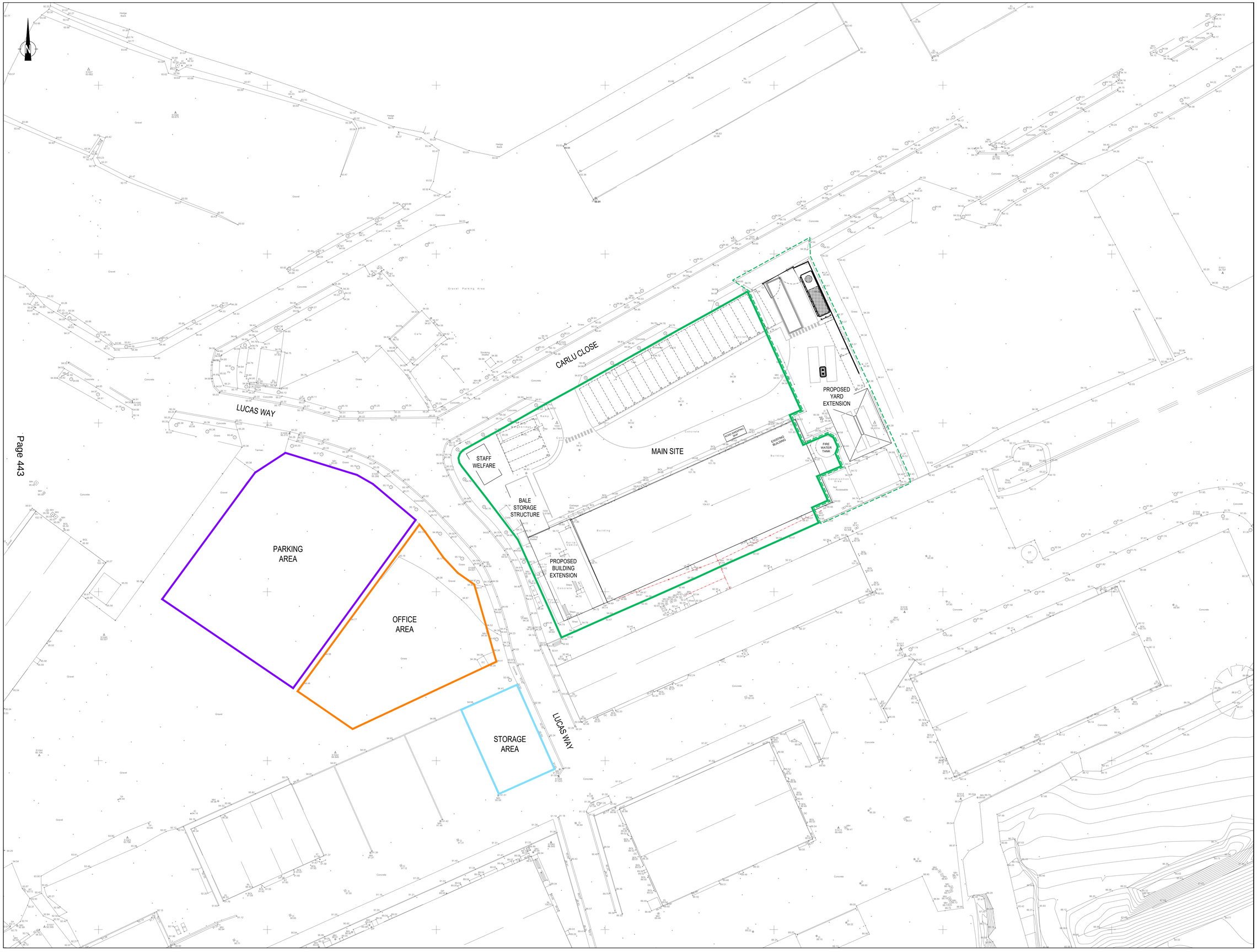
Cabinet member notified: Yes

Section 4 - Contact Details and Background Papers

Contact: Paul Deal, Head of Finance, Property and Climate Resilience
Email: pdeal@middevon.gov.uk
Telephone: 01884 23(4254)

Contact: Matthew Page, Head of People, Performance and Waste
Email: Mpage@middevon.gov.uk
Telephone: 01884 23(4919)

Background papers: StreetScene Depot - Additional Lease – 15 October 2024



NOTES: GENERAL

1. DO NOT SCALE FROM THIS DRAWING.
2. ALL DIMENSIONS SHOWN ARE IN METRES UNLESS STATED OTHERWISE.
3. THIS DRAWING SHALL BE READ IN CONJUNCTION WITH ALL RELEVANT SCHEME DRAWINGS AND SPECIFICATIONS.

Rev	Description	Drn	Chk	Date
REVISIONS				

Preliminary Issue	23.06.25	Submitted for S104	
Planning Issue		Issued for Tender	
Submitted for S38		Issued for Construction	
Submitted for S278		As Built	
DRAWING STATUS			

MID DEVON DISTRICT COUNCIL

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www.horizon-ce.co.uk

JOB TITLE
CARLU WASTE TRANSFER STATION
HITCHCOCKS BUSINESS PARK

DRAWING TITLE
EASTERN YARD EXTENSION
OVERALL SITE LAYOUT

DATE	DRAWN	CHECKED
JUNE '25	JT	–

DRAWING No.	REV.	SCALE	
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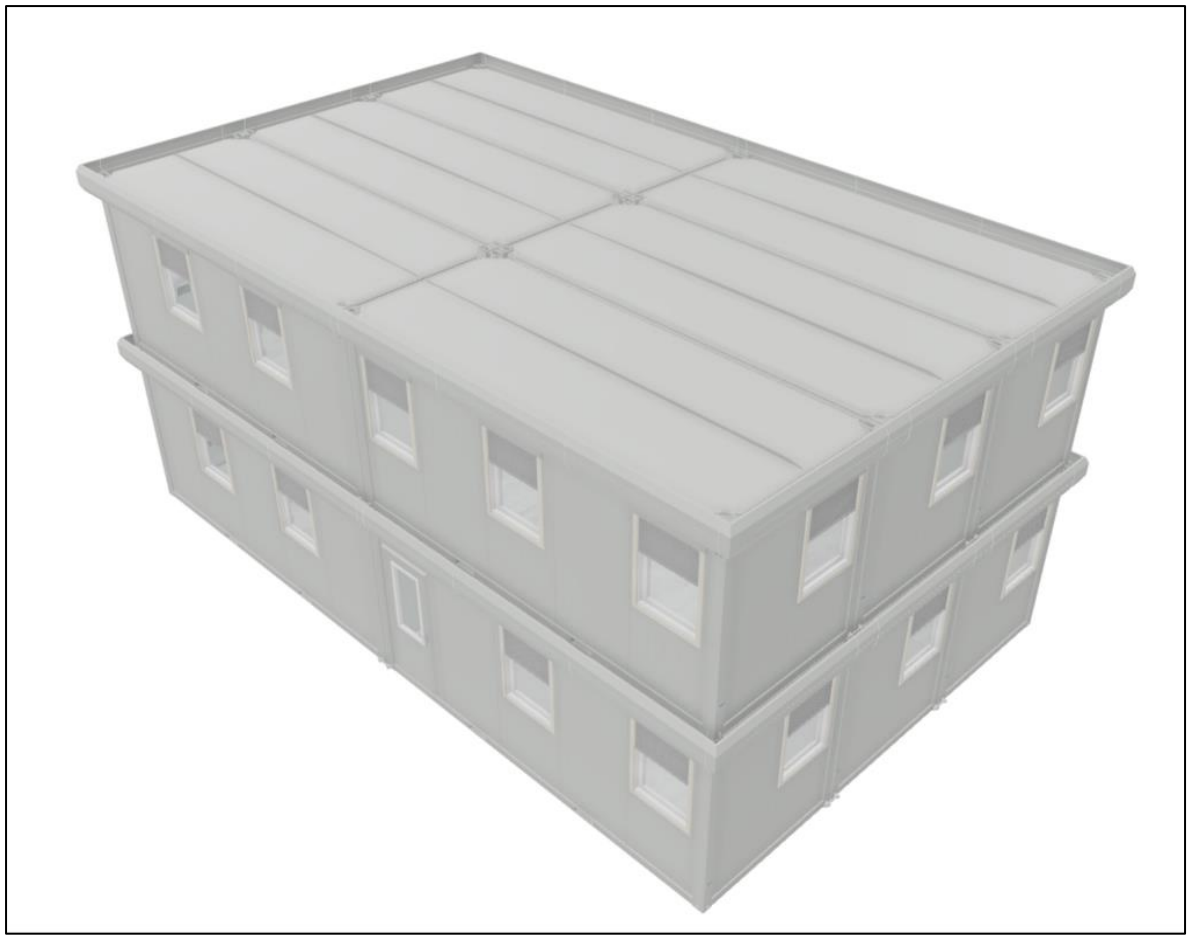
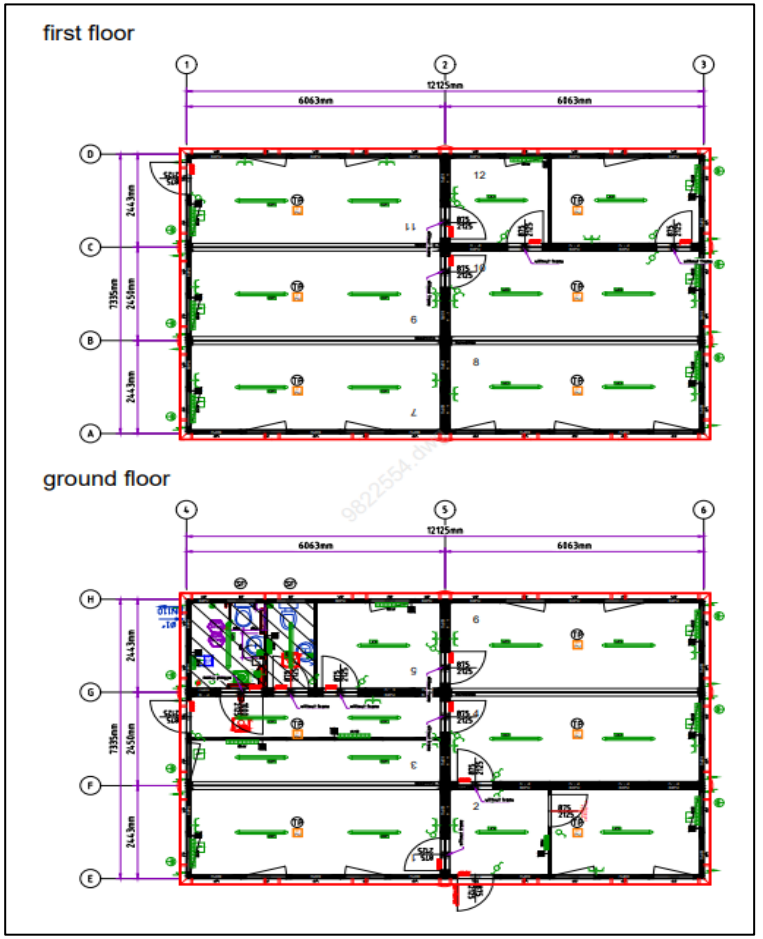
Appendix 2 – Indicative New Office complex





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MID DEVON DISTRICT COUNCIL – NOTIFICATION OF KEY DECISIONS

June 2025

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)
July 2025					
Waste Depot Remodelling To consider the future of the tenancy at Carlu Close	Cabinet	8 Jul 2025	Darren Beer, Operations Manager for Street Scene	Cabinet Member for Service Delivery and Continuous Improvement	Open
Value for Money Report - Traditional versus Modular Build To receive a report analysing the value for money in traditional builds versus modular builds.	Homes Policy Development Group Cabinet	3 Jun 2025 8 Jul 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Blackdown Hills National Landscape Management Plan	Planning, Environment & Sustainability Policy Development Group	10 Jun 2025	Tristan Peat, Forward Planning Team Leader	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)
	Cabinet	8 Jul 2025			
Corporate Risk Report	Audit Committee Cabinet	24 Jun 2025 8 Jul 2025	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	Open
Annual Performance Report	Cabinet	8 Jul 2025	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	Open
Community Engagement Strategy (Including Action Plan) Community Engagement Strategy	Cabinet	8 Jul 2025	Jane Lewis, Communications and Engagement Manager	Cabinet Member for Parish and Community Engagement	Open
August 2025					
HRA & SEA Screening & Draft Area B Masterplan for Stage 2 public consultation	Cabinet	5 Aug 2025	Christie McCombe, Area Planning 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)
Car Parking Report	Cabinet	5 Aug 2025	Luke Howard, Environment and Enforcement Manager	Cabinet Member for Governance, Finance and Risk	Open
MDDC202504-001- ASHP 2 ASHP upgrades 2025/26 - 2027/28	Cabinet	8 Jul 2025	Stephen Bennett, Building Surveyor	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Waste and Recycling Options- Pots and Pans trail	Service Delivery & Continuous Improvement Policy Development Group Cabinet	23 Jun 2025 5 Aug 2025	Luke Howard, Environment and Enforcement Manager	Cabinet Member for Governance, Finance and Risk	Open
2025/26 Budget Monitoring - Quarter 1	Cabinet	5 Aug 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Draft Devon Local Nature Recovery Strategy	Planning, Environment & Sustainability Policy Development Group	10 Jun 2025	Tristan Peat, Forward Planning Team Leader	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)
	Cabinet	5 Aug 2025			
Plan Mid Devon- Draft Policies and Site Options	Cabinet	Not before 31st Aug 2025	Tristan Peat, Forward Planning Team Leader		Open
September 2025					
MTFP Report	Cabinet	2 Sep 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
October 2025					
Unauthorised Encampment Policy To consider the report	Cabinet	7 Oct 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
MDH Mobility Scooter in Flats Policy To receive and approve the new MDH Mobility Scooter in Flats Policy which sets out the conditions under which tenants and their visitors may use, store,	Homes Policy Development Group Cabinet Council	9 Sep 2025 7 Oct 2025 29 Oct 2025	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)
and charge mobility scooters and powered wheelchairs within MDH flats and communal areas.					
Economic Strategy 2024 - 2029	Economy & Assets Policy Development Group Cabinet	18 Sep 2025 7 Oct 2025	Adrian Welsh, Strategic Manager for Growth, Economy and Delivery	Cabinet Member for Planning and Economic Regeneration	Open
Destination Management Plan for Mid Devon	Economy & Assets Policy Development Group Cabinet	18 Sep 2025 7 Oct 2025	Adrian Welsh, Strategic Manager for Growth, Economy and Delivery	Cabinet Member for Planning and Economic Regeneration	Open
Asset Management Plan To receive the revised Asset Management Plan.	Economy & Assets Policy Development Group Cabinet	18 Sep 2025 7 Oct 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Housing Strategy To receive the revised Housing Strategy.	Homes Policy Development Group Cabinet	9 Sep 2025 7 Oct 2025	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)
Play Area Inspection Policy To receive and approve the revised Play Area Inspection Policy.	Service Delivery & Continuous Improvement Policy Development Group Cabinet	15 Sep 2025 7 Oct 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Service Delivery and Continuous Improvement	Open
Corporate Risk Report	Audit Committee Cabinet	30 Sep 2025 7 Oct 2025	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	Open
Corporate Performance Q1	Cabinet	7 Oct 2025	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	Open
Draft Budget Report 2026/2027	Cabinet	7 Oct 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Data Policy (NEW) for MDH	Homes Policy	Not before 9th	Simon Newcombe,	Cabinet Member for	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)
To receive the new Data Policy for Mid Devon Housing	Development Group Cabinet Council	Sep 2025 Not before 7th Oct 2025 Not before 29th Oct 2025	Head of Housing & Health	Housing, Assets and Property and Deputy Leader	
November 2025					
Draft Budget Report 2026/2027	Cabinet	4 Nov 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
2025/26 Budget Monitoring - Quarter 2	Cabinet	4 Nov 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	
Corporate Recovery Policy To receive the updated Corporate Recovery Policy.	Audit Committee Cabinet	30 Sep 2025 4 Nov 2025	Dean Emery, Head of Revenues, Benefits & Leisure	Cabinet Member for Governance, Finance and Risk	Open
Tax Base Calculations	Cabinet Council	4 Nov 2025 17 Dec 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	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)
2025/26 Treasury Management Report - Qtr 2	Cabinet	4 Nov 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	
December 2025					
MDDC Council Tax Rebate Policy	Community, People & Equalities Policy Development Group Cabinet	11 Nov 2025 2 Dec 2025	Fiona Keyes, Operations Manager for Revenues Benefits & Recovery	Cabinet Member for Governance, Finance and Risk	
Tenancy Strategy To receive the revised Tenancy Strategy	Homes Policy Development Group Cabinet	18 Nov 2025 2 Dec 2025	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Strategic Grants Review 2025 To consider requests from external organisations for grants.	Cabinet	2 Dec 2025	Zoë Lentell, Economic Development Team Leader	Cabinet Member for Parish and Community Engagement	Open
Draft Budget Report 2026/2027	Cabinet	2 Dec 2025	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	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)
Corporate Performance Q2	Cabinet	2 Dec 2025	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	Open
Corporate Risk Report	Cabinet	2 Dec 2025	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	
Corporate Anti-Social Behaviour Policy To consider the report.	Community, People & Equalities Policy Development Group Cabinet	11 Nov 2025 2 Dec 2025		Cabinet Member for Quality of Living, Equalities and Public Health	Open
January 2026					
Shopfront Enhancement Schemes To receive a report setting out the Shopfront Enhancement Scheme for approval.	Economy & Assets Policy Development Group Cabinet	27 Nov 2025 13 Jan 2026	Simon Newcombe, Head of Housing & Health	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)
Infrastructure Funding Statement	Planning, Environment & Sustainability Policy Development Group Cabinet	25 Nov 2025 13 Jan 2026	Richard Marsh, Director of Place & Economy		Open
Draft Budget Report 2026/2027	Cabinet	13 Jan 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Fees and Charges Report	Cabinet	13 Jan 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
February 2026					
Pay Policy Report	Cabinet Council	10 Feb 2026 18 Feb 2026	James Hamblin, Operations Manager for People Services	Leader of the Council	Open
Draft Budget Report 2026/2027	Cabinet Council	10 Feb 2026 18 Feb 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	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)
2025/26 Budget Monitoring - Quarter 3	Cabinet	10 Feb 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	
Treasury Management Strategy Statement, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2026/27	Cabinet Council	10 Feb 2026 18 Feb 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
2026/2027 Capital Strategy and 2026/2027 Capital Programme	Cabinet Council	10 Feb 2026 18 Feb 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
Establishment Report	Cabinet Council	10 Feb 2026 18 Feb 2026	James Hamblin, Operations Manager for People Services	Cabinet Member for Service Delivery and Continuous Improvement	Open
Policy Framework	Cabinet Council	10 Feb 2026 18 Feb 2026	Laura Woon, Democratic Services 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)
Business Rates Tax Base	Cabinet Council	10 Feb 2026 18 Feb 2026	Paul Deal, Head of Finance, Property & Climate Resilience	Cabinet Member for Governance, Finance and Risk	Open
April 2026					
Single Equalities Policy and Equality Objective To consider the report.	Cabinet	7 Apr 2026	Matthew Page, Head of People, Performance & Waste, Dr Stephen Carr, Corporate Performance & Improvement Manager	Cabinet Member for People, Development and Deputy Leader	Open
Corporate Risk Report	Cabinet	7 Apr 2026	Dr Stephen Carr, Corporate Performance & Improvement Manager	Leader of the Council	Open
Corporate Performance Q3	Cabinet	7 Apr 2026	Dr Stephen Carr, Corporate Performance & Improvement	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)
			Manager		
Customer Care Policy To received the revised Customer Care Policy.	Service Delivery & Continuous Improvement Policy Development Group Cabinet	23 Mar 2026 7 Apr 2026	Lisa Lewis, Head of Digital Transformation & Customer Engagement	Cabinet Member for Service Delivery and Continuous Improvement	Open
Tenancy Fraud (NEW) To receive and approve a new policy in relation to Tenancy Fraud.	Homes Policy Development Group Cabinet Council	17 Mar 2026 7 Apr 2026 22 Apr 2026	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open
Aids and Adaptations policy To receive a report updating and reviewing the Aids and Adaptations Policy.	Homes Policy Development Group Cabinet	17 Mar 2026 7 Apr 2026	Simon Newcombe, Head of Housing & Health	Cabinet Member for Housing, Assets and Property and Deputy Leader	Open

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