



Plan Mid Devon
Forward Planning
Mid Devon District Council
Phoenix House
Tiverton
EX16 6PP

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By email to: planmiddevon@middevon.gov.uk

25 March 2022

Plan Mid Devon Issues Paper Consultation

This response is made on behalf of the Blackdown Hills AONB Partnership. We welcome the opportunity to contribute to this consultation. Comments are made on behalf of the Blackdown Hills AONB Partnership in respect of its role to safeguard the distinctive landscape, wildlife, historical and architectural character of the Blackdown Hills whilst fostering the social and economic wellbeing of communities. It is recognised that the AONB Partnership comprises a wide range of interests and organisations and that the comments made will not necessarily always be consistent with the views of individual organisations, or responses made by organisations as statutory consultees.

AONBs are designated under the National Parks and Access to the Countryside Act 1949. They represent England's finest countryside and are protected in the national interest for future generations. The primary purpose of the designation is to conserve and enhance natural beauty and in pursuing the primary purpose account should be taken of the needs of agriculture, forestry, other rural industries, and economic and social needs of local communities.

Comments:

Sustainability Appraisal

Page 47 – Other plans/programmes

A key point has been missed from commentary on the *Countryside and Rights of Way Act*. The Act importantly provides for AONBs (their designation, protection, consideration). It places a duty on public bodies to have regard to conserving and enhancing natural beauty (the purpose of AONBs) in exercising any functions affecting these areas.

Our view is that this means more than inclusion of a policy referring to the AONB (and National Parks); the duty needs to be reflected in the whole approach, through strategy, policies and allocations, and mindful of NPPF paragraphs 174 to 177, especially 176 on scale and extent of development.

It follows therefore that it may be appropriate to consider the settlement of Hemyock differently to others in rural Mid Devon, giving great weight to the AONB status. To some extent, this should also be a key consideration for Culmstock, and to a lesser extent Kentisbeare and Uffculme – both of which have part of the parish in the AONB, have a relationship through the Culm and its headwaters, but with the village lying in a landscape of different character.

Page 73 – Site appraisal guidance table

Concerned by what appears to be inherent underplaying of potential impact on the natural environment, namely that ‘small site’ could be up to 100 dwellings and would be scored as slight negative impact. For most of Mid Devon, especially the AONB, that scale of development would be significant and the negative impact substantial.

2.0 Sustainable Development and Six Top Priorities

Priority 4 Protecting and enhancing the natural and built environment, and respecting environmental limits

We welcome the reference to the protected landscapes up front here (although not referenced as National Parks and AONB). It is also good to see a reference to *Connecting the Culm*.

Looking ahead to this new local plan, it would be beneficial to see the opportunity taken to better align planning policy with land use and land management, which among other things could offer nature-based solutions to more effectively address flooding problems, nature recovery and green infrastructure. In the same vein, biodiversity should be at the heart of development proposals/major site allocations – designed as a whole, not just a few bird boxes and amenity planting.

4.0 Responding to the Climate Emergency and Moving to Net-Zero Carbon

Sites allocated for any use should require ultrafast broadband, EV charging infrastructure and low carbon/renewable energy as standard, allied to decentralised energy where appropriate.

9.0 Our Natural and Historic Built Environment

We support the intention to undertake a new landscape character assessment to help inform the new plan.

13.0 Our Rural Areas and Villages

Rural Economy

Concerned that the narrative in parts (notably paragraph 13.10 and 13.11) is not particularly reflective of the reality concerning agriculture, where in fact planning permission is often required for new buildings, or at least brought into the planning system through prior notification. 13.16 is a more realistic assessment of rural planning issues around agriculture; large, tall, industrial buildings on one hand, lifestyle ‘smallholders’ and equestrian on the other, plus implications of change of use permitted development. It will remain important to ensure that these matters are effectively covered by the new plan.

Small scale housing potential at villages to help sustainability

(also relevant to **16.0 A Sustainable Distribution of Development Across Mid Devon**)

It is right to reassess rural settlements as part of the new local plan, and this should include a review of how existing policy has served rural areas; for example, has new housing in 'villages suitable for limited development' been within settlement limits, has it been small scale and to meet local needs as the policy requires?

In the case of Hemyock for example, the iteration of the current local plan resulted in the village having no allocations and the plan referred to small sites within the settlement offering organic growth of the village. In reality, several sites outside the settlement limit have been permitted totalling over 100 dwellings in the last 10 years. Thus, significant housing growth has taken place without any strategic planning to consider landscape sensitivity, accessibility, infrastructure, services and facilities.

Any potential allocations in Hemyock, or policy criteria, should take full account of the AONB designation; not simply in the ultimate need for good design of any future development, but more fundamentally the principle of development and scale of growth within the AONB.

We trust that you will find our comments and observations helpful. We would be very happy to discuss any points further in due course and welcome continued involvement in the local plan process.

Lisa Turner
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