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Our ref: 270500  
Your ref: Culm Garden Village - consultation



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**BY EMAIL ONLY**

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Dear Tina,

**Culm Garden Village - Village Design Statement. Draft vision and concept.**

Thank you for your consultation request on the above dated and received by Natural England on 16<sup>th</sup> January 2019.

Natural England welcomes design guidelines that respect, and where possible, enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature.

We have the following advice for the draft vision and concept for the wider culm garden village.

**Key principles**

The vision statement identifies a number of key principles by which the garden village will be developed.

Natural England welcomes the principle of 'embedding the countryside within the garden village' in particular the objective to secure 'Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience'.

We also welcome the principles of 'creating a healthy living environment' particularly the objective to connect people to their natural environment and the 'future proof and sustainable' principle particularly the biodiversity net gain and climate change resilience objective.

**Biodiversity and biodiversity net gain**

The Design Statement should recognise and reference designated wildlife sites<sup>1</sup> and other biodiversity assets in the immediate area, such as protected species, ecological networks, habitats and green spaces. Design guidelines should respect, and enhance the local and neighbouring biodiversity resources, especially in an urban development that wishes to reflect the 'garden village' concept. The Town and Country Planning Association has produced a practical and design orientated [Biodiversity by Design](#) guide to achieving high levels of biodiversity in developments, which may be of use. When preparing the Design Statement, we recommend consulting your local Wildlife Trust and local environmental record centre and local and national Biodiversity Action Plans should be referenced where relevant.

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<sup>1</sup> Special Areas of Conservation, Special Protected Areas, Ramsar, Sites of Special Scientific Interest, Local Nature Reserves and Local Wildlife Sites

Development needs to secure a net gain for nature as outlined in Mid Devon's [Green Infrastructure Plan](#) (Policy GI/3 biodiversity net gain), paragraphs 170 and 174 of the [revised NPPF](#) (2018) and within the Defra 25 year Environment Plan.

We welcome that, as we understand from the masterplan, you have considered first what existing environmental features on and around the site can be retained or enhanced before considering what new features could be incorporated into the development proposal.

Biodiversity metrics<sup>2</sup> are available to assist developers and local authorities in securing biodiversity net gain. Local Authorities can set their own net gain thresholds but Natural England would currently expect a minimum of 5% net gain and LPAs should aim to negotiate upwards where possible. Based on the principles as set out we expect significant biodiversity net gain to be achieved for the garden village.

### **Green Infrastructure and Sustainable Design**

We welcome the focus of the vision and concept on Green infrastructure to be respected and delivered.

The existing green infrastructure is a significant constraint and the vision highlights some of the opportunities to build on this to increase habitat connectivity and multifunctional green space recognising that green space can act as not only a leisure facility but also to reduce flood risk, improve air and water quality and provide wildlife habitats.

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

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

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

### **Landscape**

To preserve the wider landscape character of the area, the Vision Statement should recognise and give appropriate consideration to the impact of the village design on protected landscapes such as National Parks and Areas of Outstanding Natural Beauty (AONB). The Culm garden village will be within 4km of the Blackdown Hills AONB.

Landscape Character Assessments (LCA) provide a context for looking at possible changes and for seeking to ensure that the countryside character is protected and enhanced. Local area LCAs and

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<sup>2</sup> e.g. Defra metric; North Devon Biosphere reserve metric based on the Defra metric

those for protected landscapes (where applicable), should be cross-referenced as they are a useful tool to ensure that the Village Design Statement makes a positive contribution in terms of design, form and location, to the character and functions of the landscape, and avoids any unacceptable impacts. Following the principles of LCA at a local scale helps to capture the significant features, style and patterns of settlement and setting within the landscape and key views in and around the village. National Park and AONB Management Plans can also provide useful information for design statements within or adjoining protected landscapes. The Blackdown Hills AONB's management plan can be found at <https://blackdownhillsaonb.org.uk/our-work/management-plan/>

Natural England's Natural Character Area (NCA) profiles are guidance documents which include a description of the key ecosystem services provided in each character area and how these benefit people, wildlife and the economy. They identify potential opportunities for positive environmental change and provide the best available information and evidence as a context for local decision making and action.

NCA profiles are available on the [NCA pages](#) of our website for you to refer to. The relevant NCA profile for the Cullompton area is the [Devon Redlands \(NE425\)](#) .

### **Community Engagement**

As an organisation, we are committed to involving the community in our work, ensuring that local people and the organisations that support them are consulted at the earliest possible stage. We are pleased to see this principle adopted as part of the village design statement formulation process so that local people have a chance to contribute to the development of the statements from the outset.

Please do not hesitate to contact me on the email or telephone number below if you wish to discuss anything in this letter further.

Yours sincerely

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