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Our ref: 270511  
Your ref: Proposed Masterplan SPD.



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**BY EMAIL ONLY**

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Dear Tina,

**Culm Garden Village. Proposed Masterplan Supplementary Planning Document (SPD) for the East Cullompton allocation – Phase 1.**

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

We welcome this opportunity to give our views on how the first phase of the garden village should look and function and advise you to consider the following issues:

**Green Infrastructure**

The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on [Green Infrastructure](#) provides more detail on this.

This SPD should consider making provision for Green Infrastructure within development in line with Mid Devon's [Green Infrastructure Plan](#)

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.

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

There may additionally be significant opportunities to include green infrastructure in urban environments such as green roof systems and roof gardens;

- green walls to provide insulation or shading and cooling;
- new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to habitat connectivity, the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "[Good Practice Guidance for Green Infrastructure and Biodiversity](#)".

Where sustainable drainage systems<sup>1</sup> are proposed their amenity and wildlife value can be increased with careful design. Guidance can be found at [https://www.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf)

### **Biodiversity net gain and enhancement**

This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on strategic net gain to be provided and/or guidance on individual development sites throughout the area, such as the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. There are several examples of good practice where LPAs are making progress with [delivering net gain](#) and Natural England would be happy to advise further.

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

Biodiversity metrics<sup>2</sup> are available to assist developers and local authorities in calculating and securing biodiversity net gain. Local Authorities can set their own net gain thresholds but Natural England would currently expect a minimum of 5% net gain and LPAs should aim to negotiate upwards of this.

### **Landscape enhancement**

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

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

For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.

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

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<sup>1</sup> [https://www.susdrain.org/community/Developers\\_Hub](https://www.susdrain.org/community/Developers_Hub) Susdrain developers Hub - understand the benefits of SuDS and support you in making the right choice for your development. It provides a wealth of resources and evidence including; case studies, videos and fact sheets supporting the inclusion of SuDS on all projects

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

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 \(NE425\)](#) .

### **Building design and layout**

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.

Key documents to assist with the development process are:

- [Biodiversity by Design](#) – a guide for sustainable communities TCPA 2004
- [Environmental quality in spatial planning](#) – incorporating the natural, built and historic environment, and rural issues in plans and strategies 2005.

The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity ([para 180](#)).

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

### **Strategic Environmental Assessment/Habitats Regulations Assessment**

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance [here](#). SPDs should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

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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