

Planning Policy
East Devon District Council
Knowle
Sid mouth
EX10 8HL

email : Planningpolicy@eastdevon.gov.uk

1 February 2019

WCN053/nf

Dear Sirs,

**RE: EAST DEVON AND BLACKDOWN HILLS LANDSCAPE
CHARACTER ASSESSMENT - Consultation Draft
Representations on behalf of East Devon New Community
partners**

I write on behalf of the East Devon New Community partners in respect of the Council's draft Landscape Character Assessment. The partner's primary interest is in the new town of Cranbrook which is now a key element of the landscape. As such I enclose comments set out below in relation to Landscape Character Type 3E Lowland Plains.

First EDNCp support the Draft LCA's treatment of those parts of the LCT3E "affected by development or where development is planned" as being distinct from the remainder of the Landscape Character Type.

EDNCp also note and welcome the identification of those parts of Cranbrook that have been constructed as Landscape Character Type 7: "Main Cities or Towns". In this regard EDNCp consider that the full extent of the existing permitted Cranbrook development and that identified in the East Devon Local Plan or forthcoming Cranbrook Development Plan Document ought, likewise, to be shown in the Draft LCA as LCT7: Main Cities or Towns.

In any event the Draft LCA should explain that the committed development will be treated as part of LCT7.

Second, EDNCp would wish to comment on the Landscape Strategy ad guidelines relating to LCT3. That guidance seeks to "integrate new development... into the existing landscape structure of trees, woodland and hedgerows, to create distinctive and attractive places to live" (p59).

It is important, in this regard to have review and assess the quality and condition of on-site habitats and landscape features, such as hedgerows and trees. The retention of all existing landscape features is not always practicable and, indeed, may not be always be desirable in the long term. Whilst it is important to have regard to landscape character and landscape features, a slavish approach to the retention of all landscape features can stifle placemaking – in particular the ability in which to deliver well-connected and designed layouts for modern living.

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In conclusion, what should be expressed through the Landscape Character Assessment is the need for a careful evaluation of landscape features alongside the wider constraints, opportunities and requirements of the site/and or development, and taking into account the long term benefits that can be delivered by better and more varied features through new green infrastructure.

In terms of "*providing the framework for development*" it is considered that rather than retaining the existing landscape structure the best practice design approach is to consider the opportunities for green infrastructure creation to include where appropriate elements of the existing landscape that are of particular value and consistent with wider design objectives or appropriate compensatory measures.

The following wording amendments are suggested:

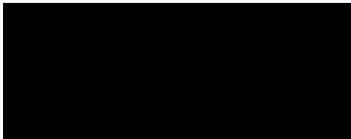
Landscape Strategy (page 58)

*In parts of the LCT affected by development or where development is planned, the existing landscape structure and character **should be assessed in terms of its value and condition. Retained landscape features of particular value (and where making a positive contribution to design), and the provision of new Green Infrastructure can help form the framework for new built** development and associated Green Infrastructure. Elsewhere, the strongly-rural character should be retained. Throughout the LCT, habitats should be enhanced and settlements should retain their distinctive characters.*

Plan - Reword bullet 1, column 2 page 59 as follows:

Where new development is occurring/planned, create distinctive and attractive places to live including through the creation of a clear landscape structure comprising new green infrastructure and where appropriate retained landscape features of particular value and contribution to design.

Yours faithfully/sincerely,



NICHOLAS FREER
BUSINESS PARTNER

