

Date: 31<sup>st</sup> January 2019

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**Land East of Honiton ('the Site'):**

**Review of East Devon and Blackdown Hills Landscape Character Assessment and Management Guidelines (Consultation Draft, September 2018), including in relation to the vicinity of the Site**

1. Barton Willmore LLP's Landscape Planning and Design team have reviewed the East Devon and Blackdown Hills Landscape Character Assessment and Management Guidelines (Consultation Draft, September 2018), on the basis of a landscape and visual appraisal of the Site and its surrounding area, including desk-based research and fieldwork.
2. The Consultation Draft focuses on the Landscape Character Types which, as noted within the report *"are generic types of landscape which can occur in different places"* (p.9). For this reason, the absence of geographically-specific distinctive characteristics is noted. This undermines the robustness of the assessment where there are distinct variations within the Landscape Character Types (LCTs), especially with regard to the influence Honiton exerts on landscape character in its immediate vicinity within the type LCT 3A. To understand how development pressures in different parts of each LCT, notably in the vicinity of Honiton, should be managed, there should be clear distinction made between different geographic areas of the LCTs. This is typically provided in the Landscape Character Assessment process through the use of Landscape Character Areas (LCAs) to subdivide the LCTs as relevant.
3. The Study Area includes *"the whole of East Devon District ... plus the entirety of the Blackdown Hills AONB"* (p.4). The urban areas in this Study Area have also been highlighted within Map 3 as *"7. Main cities and towns"*. Although the report does not explicitly exclude the urban areas from the assessment of adjoining areas, the exploration of the influence of such urban areas is limited. For instance, in the case of LCT 3A, Honiton is mentioned under Forces for Change but the assessment provides no further characteristics associated with the urban area. This is a fundamental omission in the document as the settlement of Honiton and its associated infrastructure and transport networks is substantial and, importantly, the combination of these factors exerts considerable influence on the adjoining landscape, not least as a result of the location of Honiton in a valley floor, widely visible from the surrounding area. Page 12 of the document states that:

***"Therefore, if a site or area is close to a boundary, it is important to understand the characteristics and guidelines for each of the nearby LCTs/DCAs, and to take them into account."***

4. This is a sensible and appropriate approach. However, this approach has not been applied to the interrelationship of the urban areas with their adjoining LCTs. The lack of any robust analysis of the interplay of the urban area with the surrounding landscape hinders the proper management of change in the landscape in these areas.
5. Some of the key characteristics recognised within LCT 3A, although generic, are reflected in the Site and its surroundings, such as ***"undulating upper valley slopes"***, ***"well-treed pastoral farmland"*** and ***"very winding lanes"***. However, some others such as ***"a dispersed settlement pattern of isolated farms and small villages"*** and ***"relatively remote and tranquil with little obvious modern development"*** have limited relevance to the Site or its setting at the fringes of Honiton. The proximity to Honiton and infrastructure including pylons, rail line and the A30 and A35 major roadways results in a perception of urban influence, including built form, movement and noise. This urban influence is also inconsistent with the description of this area as being ***"remote and tranquil"***.
6. Dark skies are noted as being characteristic and making this LCT special. However, the Site and its surroundings, being situated near the urban settlement of Honiton, along with the corridors of the A30 and A35 and passing trains along the Exeter-London Waterloo mainline, are subject to these light source influences, which detract from the perception of dark skies in the vicinity of the Site and the fringes of Honiton.
7. The assessment recognises the pressure for housing around Honiton within LCT 3A, however the management and planning guidelines does not suggest a strategy on how to manage such development requirements. This would be a critical addition to the document to inform the expansion of the settlement, which is substantial and a focus for development in the area.
8. Overall, the Consultation Draft provides generic information on the Landscape Character Type, however for the purposes of planning for future development, it lacks more geographically-specific information and is therefore of limited relevance to the Site and its setting at the fringes of Honiton.