

Devon County Council Response to the East Devon and Blackdown Hills Landscape Character Assessment: Consultation Draft September 2018

January 2019

Introduction

Devon County Council welcomes the opportunity to comment upon this draft landscape character assessment. The final approved version will help ensure that relevant policies in statutory development plans, including Devon's Minerals and Waste Plans, are underpinned by up-to-date evidence relating to landscape character. In helping to safeguard what is distinctive and special about the landscapes of East Devon and the Blackdown Hills, the assessment aligns with the Council's Strategic Plan "Better Together" by helping to safeguard Devon's outstanding environment - which is fundamental to the delivery of the Plan's strategic aims.

The comments below are compiled from DCC officer responses received to date and cover minerals and waste planning, flood risk management, public health, and economic development. General comments are followed by a table capturing points of detail. You will be aware that our landscape officer made comments on the first draft as part of her role on the Project's Steering Group.

General comments

The information is well presented, easy to navigate, and appropriate in its scope and content. A minor point in terms of presentation is that the guidelines annotated on the hand drawn illustrations re-used from the previous LCA are difficult to read. They may benefit from being removed since they may in any case not reflect the updated guidelines.

Whilst we appreciate the need for brevity, we would welcome opportunities to further highlight the implications of future forces for change where these impact on Devon's economy and the health, safety and wellbeing of people, including flood risk. For example, the loss of trees through disease such as Ash Dieback threatens not only to change the distinctive character and openness of the landscape but may also reduce the amount of shade along recreational routes, potentially resulting in adverse health impacts in a warming climate. We would welcome further emphasis of these issues to help to strengthen and support the associated guidelines.

A key strength of the LCA is that it helps guide change, helping to reconcile the need to keep Devon special and distinctive whilst accommodating sustainable growth and sympathetic sustainable development. We support guidelines that:

-)] Ensure that expanding visitor/tourist developments, especially in visible coastal areas and estuaries, don't impact on the very reason they are there i.e. the quality of scenery and views. If so this could be counterproductive to the wider visitor economy;
-)] Protect the quality of remaining dark skies in the more remote rural areas by promoting significant measures to limit the impact of light pollution along transport corridors, at Cranbrook and any other new community/urban extensions

- J) Sustain and enhance woodland cover that helps preserve the rural character of long-distance views towards Cranbrook, Skypark, and the Science Park areas, particularly if/when any further extensions happen.

In terms of the revisions to the LCT mapping, we will make provision to update the County-wide map of Landscape Character Types once the LCA is adopted. The Devon-wide LCA mapping is accessible under the 'landscapes' tab on our Environmental Maps here:

<https://new.devon.gov.uk/environment/environmental-maps>

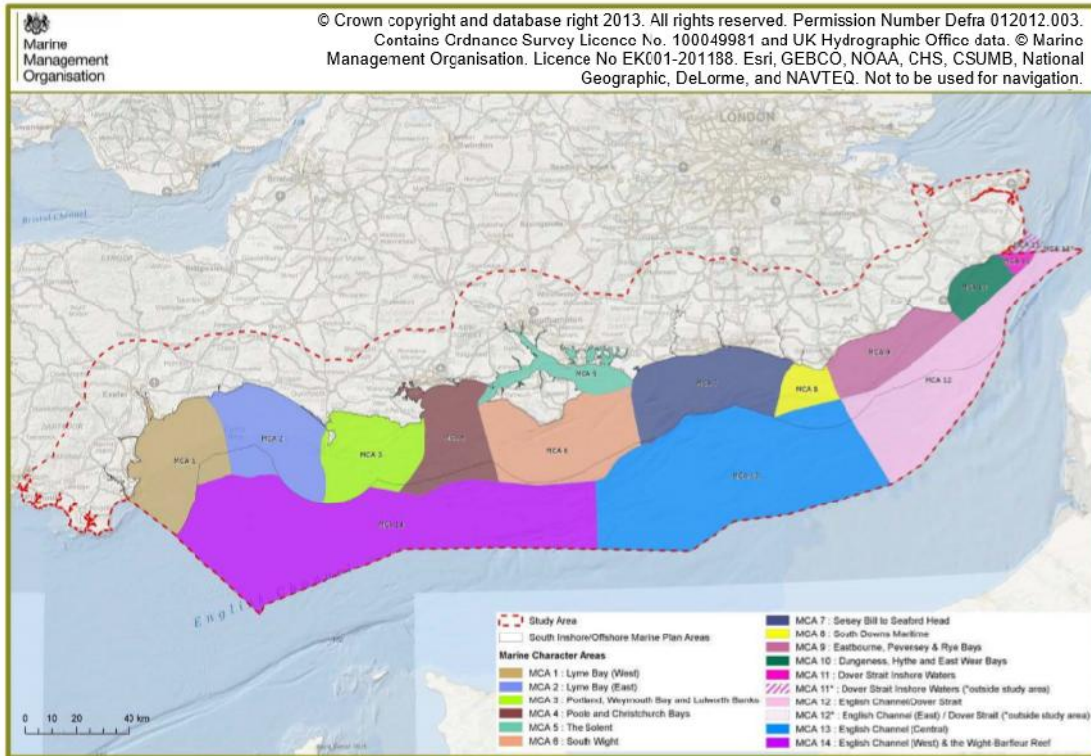
Detailed Points

Page	Ref / Topic	Comment
p. 6	1.6 Relationship to other documents	The list of documents should include the Devon Minerals Plan and Devon Waste Plan (and their Somerset equivalents including Taunton Deane Local Plan/Core Strategy that cover part of the Blackdown Hills within the study area).
p.12	2.6 LCT 2: Scarp slopes	Typo- should be LCT 2A, not LCA 2A.
p. 13	Map 3: LCTs	It would be helpful if this map could be annotated to highlight the key changes made to LCTs since the original LCA was published back in 2006. This would serve as a suitable record of such changes.
p.30	LCT 1C: Past and current forces for change	We would query the reference to "active quarrying and processing" in relation to the Pebble Bed Heaths- 'recent' would be more accurate following the cessation of quarrying and processing at Blackhill, Venn Ottery and Rockbeare Hill.
p.30	LCT 1C: Future forces for change – 1 st bullet	There seems to be a misunderstanding of the purpose of the Mineral Safeguarding Area – it does not provide for future mineral extraction and infrastructure but seeks to avoid other forms of development that may sterilise the mineral resource. Paragraph 3.3.8 of the Devon Minerals Plan states that " <i>inclusion of land within a Mineral Safeguarding Area carries no presumption that mineral development would be acceptable or that planning permission would be forthcoming for extraction</i> ". In addition, the Pebble Beds are protected through Policies M18 (the AONB great weight/exceptional circumstances test) and M17 (international nature conservation sites).
p.30	LCT 1C: Future forces for change – 2 nd bullet	The risk of losing various types of trees due to the impact of climate change may also have a negative impact on physical activity where these trees offer shade and support other recreational activities such as photography and art. Where the loss of trees is known to be along well used recreational spaces, we recommend a suitable guideline on the following page to 'plan to mitigate loss of trees that provide interest and shade for areas and routes used for outdoor activity'. This is likely to be applicable for many more LCTs.
p.30	LCT 1C: Future forces for change – 5 th bullet	Should 'West End village' be 'West Hill village'?
p.38	LCT 1E: Future forces for change – 1 st bullet	See comments above on p.30 2 nd bullet regarding loss of trees
p.47	LCT 3A: Guidelines-Plan	We welcome the penultimate bullet point to enhance the Public Rights of Way network and create circular trails, as this will help sustain and increase physical activity provision.

p.55	LCT 3C: Guidelines- Plan	<p>We support the guideline to ‘Develop integrated flooding and water quality solutions (including Natural Flood Management) for floodplains and wider river catchments.’ This will help to future proof existing levels of flood protection against the increasing risks from climate change.</p> <p>We suggest that the following is included: “<i>Work with farmers to encourage sustainable farming practices and land management such as soil aeration, crop selection or hedge reinstatement to reduce, attenuate or slow the runoff from agricultural land</i>”.</p>
p.78	LCT 4D: Future forces for change	<p>In the penultimate bullet point, is the issue loss of local building stone, or is it that quarrying of local building stone may cause loss of bat habitats? This needs to be clearer and should avoid giving the impression that quarrying of local building stone is necessarily a problem, as it can assist in maintaining local distinctiveness/character.</p>

MJC/29/01/19

Figure 13: Marine Character Areas.



Source:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/488992/Seascape assessment for the South inshore and offshore marine plans MMO 1037 final report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/488992/Seascape_assessment_for_the_South_inshore_and_offshore_marine_plans_MMO_1037_final_report.pdf)