
From: Sam Scriven [REDACTED]
Sent: 19 December 2018 12:22
To: Planning Policy
Subject: Draft Landscape Character Assessment comments

Thank you for consulting the Jurassic Coast Trust. This is an extremely useful piece of work for the ongoing management of the Jurassic Coast. The following comments are submitted in particular regards to how the landscape character types relate to the Outstanding Universal Value and Setting of the Dorset and East Devon Coast World Heritage Site (WHS), otherwise known as the Jurassic Coast.

p.25 - first bullet under key characteristics refers to 'Old Red Sandstone' - this is an outdated geological term and also incorrect. There is no 'Old Red Sandstone' in East Devon. Suggest change to Permian and Triassic sandstone and mudstone.

p.25 - What Makes it Special paragraph - the LCT doesn't exclusively form the setting of the WHS, only part of it.

General comment - All LCTs that are adjacent to the WHS arguably contribute to its setting. Relevant LCTs are 1b, 1c, 2a, 3a, 4a, 4b, 4d, 5d. Preferably this should be noted in the LCT descriptions.

p.27 - under 'plan' list - 6th bullet referring to quarries - in addition to landscape character and biodiversity quarry management and restoration plans should also enhance geodiversity

p.43 & p.47 - management guidelines for LCTs 2a and 3a both refer to the need to manage water run-off. This is not an issue per-se, but we recommend that the descriptions note the fact that groundwater regimes contribute to the functional setting of the WHS. That is they drive some of the natural cliff processes that in part underpin the WH inscription.

p.77 - what makes it special' paragraph - mentions WHS but also geological SSSIs whereas LCT 4h only mentions habitats as SSSIs. This is unhelpful inconsistency when referring to geological SSSIs, especially in regards to the WHS. Geological SSSIs overlap many of the LCT and are likely found throughout the entire assessment area. We suggest a more consistent way is found to incorporate reference to these statutory conservation designations.

General Comment - Each LCT comes with management guidelines with subheadings Protect, Manage and Plan. The need to protect, manage and plan for the conservation of the WHS is very poorly represented in these sections, perhaps most significantly from LCT 4h (cliffs) which includes the area within the boundaries of the WHS itself. Archaeology is listed as a feature to protect and yet the WHS, which is of the absolute highest heritage value, is not. It may be sensible to have a direct conversation with us to discuss how the interests of the WHS can be appropriately and more consistently represented within the LCT descriptions.

p.80/81 - We object to the word 'unsettled' being used as a key characteristic of the cliffs LCT. This carries negative connotations when in fact its 'unsettled' nature is part of its tremendous aesthetic, environmental, heritage and economic value. Suggest changing this to dynamic, changing, active or something similar.

p.82 - under future forces for change - should include a point to complement one made in other LCTs of 'Potential impacts from Coastal Change Management, including accommodating development at risk from coastal erosion'. e.g. Development may increase pressure for more coastal defences, impacting natural processes and conservation and heritage assets such as the SSSIs, SACs and WHS.

I am happy to talk through any of these points.

Thanks again

kind regards

Sam

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