

**Report to:** **Strategic Planning Committee**

**Date of Meeting:** 26 March 2019

**Public Document:** Yes

**Exemption:** None

**Review date for release** No document review is planned.



**Agenda item:** 8

**Subject:** **East Devon and Blackdown Hills Landscape Character Assessment**

**Purpose of report:** This report advises of the consultation on the draft East Devon and Blackdown Hills Landscape Character Assessment and it summarises and comments on responses received. The report seeks formal approval for endorsement of the revised Landscape Character Assessment that has been amended, where appropriate, taking comments into account.

**Recommendation:** **Strategic Planning Committee is recommended to note the comments received on the Draft document and to adopt the revised (2019) East Devon and Blackdown Hills Landscape Character Assessment for use in decision making.**

**Reason for recommendation:** To gain formal approval for the amended Landscape Character Assessment.

**Officer:** Ed Freeman, Service Lead – Strategic Planning and Development Management

**Financial implications:** There are no specific financial implications.

**Legal implications:** The outcome of the consultation ensures the Landscape Character Assessment identifies locally distinctive landscape features, characters and special qualities which can be used to inform Local Plan and Neighbourhood Plan preparation as well as cross-boundary issues and proposals which may have an impact on East Devon. There are no legal implications other than as set out in the report.

**Equalities impact:** Low Impact

**Risk:** Low Risk  
There is a low risk identified and associated with securing approval for this document.

**Links to background information:** • Links are provided in the body of the report.

**Link to Council Plan:** The Landscape Character Assessment has direct links with – [“Delivering and Promoting our Outstanding Environment”](#).

## 1 Introduction

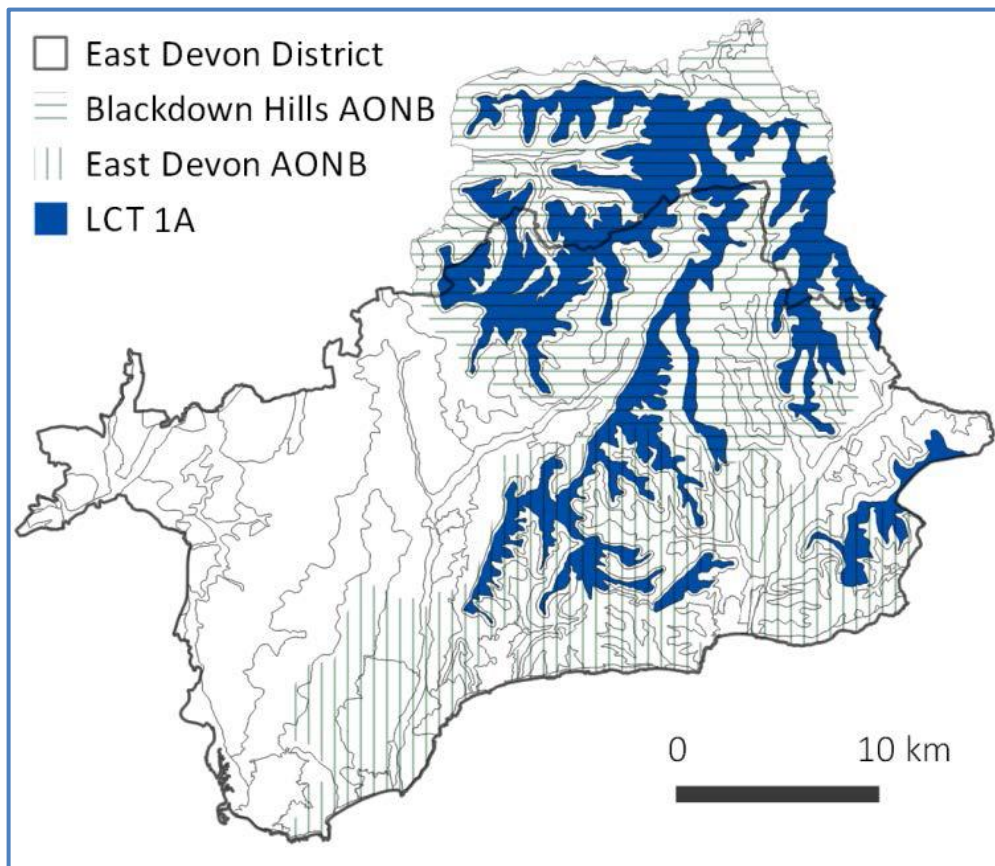
- 1.1 A Landscape Character Assessment (LCA) seeks to characterise and describe features, landform and land uses that make up the landscape. Through having a thorough understanding of landscape character it becomes easier to plan and manage potential changes in a more consistent and robust manner. Natural England have produced guidance on LCA production - An Approach to Landscape Character Assessment - October 2014 which can be viewed at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/691184/landscape-character-assessment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf)
- 1.2 East Devon District Council, working in partnership with Devon County Council and the East Devon Area of Outstanding Natural Beauty (AONB) partnership and the Blackdown Hills AONB partnership, commissioned the assessment work in 2018 and, following Strategic Planning Committee approval on 27 November 2018, the draft was subject to public consultation that concluded in February 2019.
- 1.3 The LCA covers the whole of East Devon district, which means that it explicitly covers the whole of the East Devon AONB. The assessment also, however, covers the whole of the Blackdown Hills AONB and whilst most of this designated area falls in East Devon parts are also located in Mid Devon, South Somerset and Taunton Deane.
- 1.4 This Landscape Character Assessment is not a brand new piece of work, rather it is an update of an assessment that was completed in 2008. The update responds to changes that have occurred both in the landscape and also in approaches and methodology of assessment since the original work was undertaken.
- 1.5 The now amended LCA (the document that we seek endorsement of), and information on the consultation draft and responses received, can be/will be available to view on the Council web site at: <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/>
- 1.6 The LCA is intended to have a wide range of end users – the list is not exhaustive but it includes planners, developers, farmers and foresters and land users and managers, those involved in conservation and more generally the public and local communities. The document therefore offers commentary, advice and recommendations relevant to these and other users and user groups.

## 2 The Format and Structure of the Draft Landscape Character Assessment

- 2.1 The bulk of the LCA is based around 18 different landscape character types (abbreviated to LCT) that are identified, categorised and found in East Devon. For example area LCT 1A is defined as “*Open Inland Planned Plateaux*” and the assessment advises that:  
*“This LCT occurs in the eastern half of the Study Area, and contains some of the highest land. It comprises a series of elevated fingers of land which are flat or gently*

*undulating. The boundaries of the LCT are generally clearly marked by the transition to steep scarp slopes below (LCT 2A). This is a relatively simple landscape, with strong horizontal elements: flat horizons, straight roads and regular field boundaries.....”*

- 2.2 The map reproduced below, taken from the draft assessment, defines the extent of this 1A character type. For this and the other 17 defined landscape character types the assessment describes the key characteristics that define and establish the landscape type, what past and current potential forces or factors exist that have or may produce changes (these are changes potentially for the worse, though could be for the better) and what changes may arise in the future. For each landscape character type the assessment also identifies a strategy for managing potential forces for change along with more detailed guidelines.



- 2.3 For a complete picture of all document content, and specifically all area types, the LCA, both the consultation draft and now the amended version, should be read in their entirety.

### 3 Consultation Response

- 3.1 In total there were responses received from 21 individuals or organisations on the consultation. Most were supportive of the LCA and its content and approach. Appendix 1 to this report provides more details of who responded and the comments they made as well as an officer response and recommended changes arising from comments. A very succinct commentary on responses received is, as well, provided below. It is stressed, however, that for a complete picture all responses should be read in their entirety, web links to comments are provided in Appendix 1.

- 3.2 Four of the responses that were received were from agents acting for land owners or businesses with an interest in land, with a view to possible potential for development; these were:
- Barton Wilmore – for land to the east of Honiton;
  - David Lock Associates – land at Cranbrook;
  - Lichfields – land at Devon Cliffs Holiday Park near Exmouth; and
  - Savills – land at Uplyme west of Lyme Regis.
- 3.3 Of these agent responses Barton Wilmore considered the LCA to be insufficiently detailed to be of specific relevance to land that their client has an interest in. The other three respondents questioned the degree to which the LCA sought to define an appropriate strategy and means for managing potential change in defined areas. There was a view that the LCA should set an approach that was more accommodating of development and also that the LCA seeks, inappropriately, to establish policy rather than provide evidence.
- 3.4 In broad response to these agent comments it is considered that the LCA is pitched at an appropriate level that strikes an appropriate balance between giving a broad brush overview of landscape types (and avoiding excessive levels of detailed assessment) whilst also giving a steer on key factors that are relevant to and may inform future decision making. An objective being to support the integrity of and the positive characteristics that help define the separate landscape character types. There are, however, some recommended changes made to the proposed LCA for adoption to clarify that it does not constitute formal planning policy (rather it is evidence to assist with application of policy and future policy making) and that in arriving at decisions (for example determining planning applications) a full range of material considerations, across social, economic and environmental fields, may be relevant and need to be taken into account. The recommended changes are set out in Appendix 2. Also in Appendix 2 there is commentary on inclusion of a new section in the LCA called “Forces for Change” that comments on potential matters that could impact on the landscape in the future.
- 3.4 There were a limited number of comments from public bodies and some individuals that gave either general support or neutral comment for or on the LCA without highlighting need for change. In one case it was not considered that the comment received really related to the LCA but were concerned with past planning decisions.
- 3.5 The bulk of comments received were, however, supportive of the principles behind the assessment, the approach taken, conclusions reached and the general form and content. A number of respondents falling into this broad category made comments on matters of detail that were seen as beneficial in respect of improving and refining the LCA and in most cases comments received have informed text amendments in the proposed final LCA.

## **4 The Revised Draft of the LCA and Recommendation of Document Endorsement**

- 4.1 In light of the comments received on the consultation, and recommendations for change by officers set out in Appendix 1, the draft LCA has been amended to form a final document on which approval is sought. It is stressed that Appendix 1 does not include full details of all changes made in the proposed draft of the document, rather it concentrates on the more significant matters or issues. Minor changes have not been explicitly logged or recorded

and for a complete picture of changes the old version and the new version of the LCA need to be read alongside one-another.

- 4.2 The revised LCA, that is recommended for approval, will be on the planning policy web pages at: <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/>
- 4.3 On assumption of endorsement the LCA will provide a key landscape evidence document to support planning decision making in East Devon, including in respect of determining planning applications and future policy making. It will, as well, help inform much wider decision making, plans and management regimes as may be undertaken by this council, its many partners (specifically including the AONB partnerships and Devon county Council) and other organisations.

## Appendix 1 - Comments Received on the Draft Landscape Character Assessment Along With Officer Response and Recommendations

In total there were response received from 21 individuals or organisations on the consultation. Over the page there is a table that, by column heading, sets out details of;

1. **Respondent** - Identifies the person or organisation making the response – it is highlighted that the text in this column also forms a web link to the submission received (though with appropriate contact details redacted). In some cases responses received relate in part or whole to specific areas of land that the respondent has an interest in – where this is the case summary text is also provided to explain where the land is;
2. **Officer Summary of Issues Raised** - Provides an officer summary of key points raised (or in some cases the text or extracts are reproduced), relevant to the LCA report, in comments made – it is stressed that this is an officer summary only and for a complete picture (specifically as made by the respondent) representations should be viewed in their entirety;
3. **Officer Commentary on issues Raised** - An officer commentary on the issues raised in consultation response and comment on appropriateness of changes to the LCA; and
4. **Summary of Recommend Changes to the LCA** - Details of any changes made to the Draft LCA in response to comments made.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<p><a href="#">Barton Willmore</a></p> <p>It should be noted that in their response Barton Wilmore highlight an interest in land to the east of Honiton.</p>	<p>In their response Barton Wilmore (their paragraph 2) advise that: <i>“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</i>”. They consider that the overall assessment work should provide more detail of variations across and within the differing Landscape Character Types, specifically in respect of managing potential development pressures. They advise that this level of detail is typically provided in Landscape Character Assessment processes.</p>	<p>The Landscape Character Assessment work that was commissioned was by clear intent and design a higher level assessment that sought to generate a generic overview of key themes and patterns in the landscape. Whilst some Landscape Character Assessment may drill down into more detailed work (as Barton Wilmore suggest would be appropriate) this is by no means a universal approach and to take this approach across the whole of the study area would be extremely time consuming and expensive. Furthermore the assessment process that has been applied is directly compatible with the approach taken across the rest of Devon, it is a widely used standard and does not, in any sense, preclude more detailed evaluation that could be undertaken (and would be expected) for detailed or specific areas of land.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA.</p>
	<p>Barton Wilmore object to the LCA (their paragraphs 2 and 3) on the basis that it does not provide an assessment of urban areas and the characteristics of urban areas and the influences they have on surrounding areas. They highlight that the urban character of Honiton influences and impacts on landscape to the east of the town and that this should be referred to in the overall assessment.</p>	<p>To assess all towns and urban areas, through the LCA process, and as may be implied should be done, would be a very time consuming and expensive exercise. It is not appropriate as the assessment process, by design, does not seek to highlight every possible consideration that impacts on adjoining land areas and specifically the interactions between urban and rural areas; rather it seeks to provide a generic overview of key characteristics. The LCA does not preclude site specific assessment work from being undertaken, rather it actually provides a context to help with more detailed assessment.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Barton Wilmore (in their paragraphs 5 to 8) highlight that the assessment for the landscape area 3A (the area of land that they have interest in falls in 3A) does describe some of the feature that are found in their land area of interest but the description also includes feature that are not present. They also highlight that there are factors that are relevant to their land area of interest that do not feature in the description or related assessment.</p> <p>They raise concern that the LCA does not set out as strategy for managing development of land that they have an interest in and dismiss the strategy as being of limited relevance to their site interests.</p>	<p>It is recognised and acknowledged that, in being a broad brush assessment, that not every specific detailed area of land will contain all of the generic features listed, as being characteristic, for any given Landscape Character Area type. By clear intent the LCA is broad brush and it would not be expected that any given specific site will not contain everything that an overarching description of character area types will contain.</p> <p>It would, short of producing an extremely long and detailed document (at great expense), be impossible to produce the kind of highly detailed assessment, across the whole of East Devon and the Blackdown Hills, that Barton Wilmore imply is appropriate.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA.</p>
<a href="#">Colaton Raleigh Parish Council</a>	<p>The Parish Council advise:</p> <p><i>“The report is well structured and features many different kinds of landscape.</i></p> <p><i>However, Colaton Raleigh Parish Council is concerned that the report does not address the importance of preventing soil loss and preserving soil fertility for these landscapes.</i></p> <p><i>Landscape management that fails to address the prevention of soil erosion can lead to a reduction in vegetation as well as more soil deposits in rivers and water courses. Fertile soil needs to be protected both with farming techniques and with attention to new building. This is especially important now as climate change accelerates soil erosion and it is paramount to preserve soil fertility.”</i></p>	<p>The observations are welcomed and it is agreed that it would be beneficial for soil erosion considerations to be referenced in the revised LCA.</p>	<p>Include references to soil erosion considerations.</p>



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Cranbrook Town Council</a>	<p>The town council note the broad ranging scope of the LCA and they highlight the ongoing work on the Cranbrook Plan, they comment that the LCA is: <i>“a very professional document, providing up to date assessments.”</i> In comments the town council note threats that can occur to the landscape and potential for mitigation.</p> <p>The town council advise that they <i>“commend the report, and reinforce the recommendations in the Cranbrook Master plan, reminding EDDC planning of the need to adhere to principles shown in local plans - such as preserving the green spaces and corridors between neighbouring villages, thus preventing their absorption into a ‘greater Cranbrook’”</i>.</p>	The comments are noted and welcomed.	No changes are recommended.
<a href="#">David Lock Associates on behalf of East Devon New Community Partners</a>  David Lock Associates advise that they are writing on behalf of the East Devon New Community partners (EDNCp) with	<p>David Lock Associates (in their “First” issue raised) provide support for landscape character area 3E (the area in which Cranbrook falls) in respect of the way that it addresses areas <i>“affected by development or where development is planned”</i>. They consider that the full extent of permitted and allocated development at Cranbrook should be shown under the ‘Main Town or City’ classification, which has reference number LCT7. They also consider that the document should explain that committed development will be treated as part of LCT7.</p>	<p>It is agreed that it would be appropriate and informative to users of the LCA to show the area of Cranbrook that is built, has planning permission for development and which is allocated in the East Devon Local Plan for development under the ‘Main Town or City’ classification (this has area Type 7). However at this stage (as at March 2019), as it is still an emerging plan, it would be inappropriate to show the additional proposed allocations for development in the Cranbrook Plan under this classification. Bearing this change it is not relevant to have further written commentary in respect of committed development in the text. It is also appropriate to show other newly built, permitted and local plan allocated sites elsewhere in the urban areas around East Devon under the classification.</p>	<p>Show, with a cross hatch notation, areas of land around Cranbrook and other towns that have planning permission for development or are allocated in the local plan.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
specific interest in Cranbrook.	<p>David Lock Associates (in their “Second” issue raised) express concerns in respect of LCT3E, and the text box headed “Landscape Strategy” that that <i>“The retention of all existing landscape features is not always practicable and, indeed, may not always be desirable in the long term.”</i> Inappropriate retention, they contest <i>“can stifle placemaking – in particular the ability in which to deliver well-connected and designed layouts for modern living.”</i> They suggest that text should be amended to promote the best practice design 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.</p>	<p>It is agreed that absolute retention of all landscape features, in all instances, can be inappropriate. On this basis it is desirable to amend the text, however there is a concern that the changes promoted go far and could threaten and bring about loss of landscape features that are important or desirable to retain. In response, and following more detailed officer working group critique, it is considered the text should be amended to read:</p> <p><i>Landscape strategy</i>  <i>In parts of the LCT affected by development or where development is planned, the existing landscape structure <b><u>and character</u></b> should <b><u>be assessed in terms of its value, susceptibility to change,</u></b> and condition, <del>form the framework for development and associated</del> <b><u>Landscape features worthy of retention can help to create high quality, distinctive and functional places and opportunities should be taken to include these within</u></b> Green Infrastructure <b><u>for new built development, and allow for their ongoing management.</u></b> Elsewhere, the strongly-rural character should be retained. Throughout the LCT, habitats should be enhanced and settlements should retain their distinctive characters.</i></p>	Amend the text as highlighted in officer commentary.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Devon County Council</a>	<p>Devon County Council welcomed the LCA and highlighted that it will help ensure that relevant policies in statutory development plans, including Devon's Minerals and Waste Plans, are underpinned by up-to-date evidence.</p> <p>They suggested that the hand drawn pictures may be better annotated and 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. They highlight, for example, that the loss of trees through disease such as Ash Dieback threaten not only 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. They would welcome further emphasis of these issues to help to strengthen and support the associated guidelines.</p> <p>In addition to these broad brush issues a number of more detailed and specific points were raised, these are reproduced below showing the text in the submitted representation:</p>	<p>It is agreed that it would be desirable to improve the text on the hand drawn plans to make them more legible. It and also agreed that, what are minor tweaks to the document, are relevant to strengthen and support the guidelines. These will be addressed in a new section called forces for change in the introduction.</p>	<p>Recommended that the text on the hand drawn pictures are improved</p>
	<p>Page 6 – Para 1.6 – Relationship to other documents:  <i>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).</i></p>	<p>It is agreed that, as these plans should be informed by the LCA, that links should be provided to relevant Devon and Somerset waste and mineral plans and local plans.</p>	<p>Links are made suggested plans.</p>
	<p>Page Para 12 - 2.6 LCT 2:  <i>Scarp slopes Typo - should be LCT 2A, not LCA 2A.</i></p>	<p>Agree that this is a typographical error.</p>	<p>Amend text as suggested.</p>
	<p>Page 13 Map 3: LCTs  <i>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.</i></p>	<p>An appendix is added with the changes made to the landscape character type boundaries – showing location and reasons for change from the past LCA to this LCA and correcting anomalies and mistakes in the past LCA.</p>	<p>Add an appendix showing changes.</p>
	<p>Page 30 LCT 1C: - Past and current forces for change  <i>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.</i></p>	<p>It is agreed that the change proposed would add clarity.</p>	<p>Amend text, as suggested.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Page 30 LCT 1C: Future forces for change – 1st bullet  <i>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 “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”. In addition, the Pebble Beds are protected through Policies M18 (the AONB great weight/exceptional circumstances test) and M17 (international nature conservation sites).</i></p>	<p>It is agreed that the role of safeguarding is to resist development that could prejudice potential for mineral extraction rather than indicate that extraction should happen or is appropriate.</p>	<p>Amend text to make role of safeguarding clear.</p>
	<p>Page 30 LCT 1C: Future forces for change – 2nd bullet  <i>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.</i></p>	<p>It is agreed that loss of trees could have adverse impacts on recreational routes and wider activities and therefore planning to mitigate adverse impacts is appropriate. In the new “Forces for Change” Section” relevant text is included.</p>	<p>Add text to highlight considerations relating to tree loss.</p>
	<p>Page 30 LCT 1C: Future forces for change –  5th bullet Should ‘West End village’ be ‘West Hill village’?</p>	<p>This reference to West End villages is actually somewhat spurious, and in reviewing the document it is more appropriate to just take out the bullet point.</p>	<p>Amend text to remove bullet point.</p>
	<p>Page 38 LCT 1E: Future forces for change – 1st bullet  <i>See comments above on Page 30 2nd bullet regarding loss of trees</i></p>	<p>It is agreed that loss of trees could have adverse impacts on recreational routes and wider activities and therefore planning to mitigate adverse impacts is appropriate.</p>	<p>Amend text to highlight considerations relating to tree loss.</p>
	<p>Page 47 LCT 3A: Guidelines – Plans  <i>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.</i></p>	<p>Comments and endorsement of the LCA is welcomed.</p>	<p>No change.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Page 55 LCT 3C: Guidelines - Plan  <i>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. We suggest that the following is included: "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>Comment and endorsement is welcomed and it is agreed that the suggested change would help.</p>	<p>Amend text, as suggested.</p>
	<p>Page 78 LCT 4D: Future forces for change  <i>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.</i></p>	<p>There are two separate issues here, one about stone for quarrying and the other about bats. It is considered that they should feature in separate bullet points.</p>	<p>Amend the text as suggested.</p>
<a href="#">Devon and Cornwall Police</a>	<p>Devon and Cornwall Police, in comments made, highlight the role of the Police Designing out Crime Officer as the single point of contact for the planning authority, architects and developers in designing out opportunities for crime, fear of crime, antisocial behaviour (ASB) and conflict in the built environment.</p> <p>They advise that <i>"Legislation under Section 17 of the Crime and Disorder Act (1998) places a duty on the planning authority to consider preventing crime, fear of crime, ASB and other behaviour which adversely affects the local environment (as referred to in the NPPF). Being mindful that this document is to inform the management of change and to deliver sustainable development, I hope you deem it appropriate that opportunities for designing out crime, the fear of crime, ASB and conflict are recognised and referenced in such a document."</i></p>	<p>Whilst it is understood and acknowledged that initiatives to design out crime can be very relevant and important in many development proposals the role of the LCA is specifically concerned with landscape matters, rather than broader brush design and development matters. Should reference be made to designing out crime in this LCA it would be logical to include reference to a great many other guidance documents on a diverse range of subject matters, this would make the LCA unreasonably long. The change suggested is, therefore inappropriate.</p>	<p>No change.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Devon Gardens Trust</a>	Devon Gardens trust advise: <i>"The Devon Gardens Trust would like to congratulate you on this excellent report. We would suggest that perhaps mention should be made of the contribution that historic designed landscapes particularly those in the English Landscape Style associated with many of country houses and country estates in East Devon have made to the landscape character of the County."</i>	It is agreed that it would be desirable for mention to be made in the LCA of the contribution that historic designed landscapes associated with country houses and country estates.	Put extra text into the 1B profile (see Killerton and Bickton references).
<a href="#">Equality and Human Rights Commission</a>	The Equality and Human Rights Commission advise:  <i>"The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or infrastructure projects unless they raise a clear or significant equality or human rights concern.</i>  <i>Local, Parish and Town Councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people."</i>	It is not considered that the LCA raises issues that have a bearing on the matters raised in the Public Sector Equality Duty and therefore no further action or changes to the document are appropriate.	No change.
<a href="#">Exmouth Community Association</a>	The Exmouth Community Association welcomes the LCA and the work that has gone into its production. In this context they highlight the stage of production of the Exmouth neighbourhood Plan (approaching referendum) and they agree with the strategies for the three landscape types at Exmouth. They stress that the LCA contents need to be pursued in practice advising <i>"In this way, hopefully, through a mix of direct action, influence and partnership working, our wonderful environment will in fact be protected and enhanced in the way this Assessment recommends"</i> .	The positive comments are welcomed.	No change.



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Hawkchurch Parish Council</a>	<p>Hawkchurch Parish Council advise that they accepts the recommendations of the draft document. They state that:</p> <p><i>“We note that there are very clear landscape management planning guidelines for each landscape character type in the Hawkchurch parish and that they are comprehensive and appropriate. The Parish council expects these guidelines to be adhered to by EDDC in any future planning decisions and considers that to a large extent the character assessment in conjunction with the Local Plan reduces the value of having a Neighbourhood Plan. We may however evaluate the possible benefits of a Neighbourhood Development Order to be used in conjunction with EDDC plans and will approach the Senior Planning Officer to discuss this further.”</i></p>	<p>The comments made are noted and</p>	<p>No change.</p>

<p><a href="#">Lichfields on behalf of Bourne Leisure</a></p> <p>These representations are specifically in respect of the Devon Cliffs Holiday Park near Exmouth that Bourne Leisure operate.</p>	<p>Whilst it is advised that Bourne Leisure supports the overall process of a Landscape Character Assessment (their 3<sup>rd</sup> paragraph) they (in their 4<sup>th</sup> and 5<sup>th</sup> paragraphs) consider that the assessment should not include the planning guidance section that exist as part of each section that assesses the different landscape character types. They suggest that this section amounts to policy</p> <p>They consider that the LCA should be limited to providing an evidence base that is limited to assessment of the landscape types, character and characteristics and not include what they see as creating new policy that <i>“fails to recognise the wider context of how it would be used as a material consideration in planning decisions alongside the development plan and other material considerations.”</i> They contest that such an approach to LCAs is inconsistent the national guidance issued by Natural England.</p>	<p>As part of the assessment of each LCT there is a page of text that includes a heading title called “Landscape Management and Planning Guidelines” and under this three sub-headings (with bullet point guidance under these that read:</p> <ul style="list-style-type: none"> <li>- “Protect” – which is concerned with key characteristics or features that should be protected;</li> <li>- “Manage” – that is concerned with management issues; and</li> <li>- “Plan” – that is geared around planning considerations.</li> </ul> <p>It is the “Plan” element that is objected to. However, it should be noted that these three elements are explicitly identified in the Natural England guidance on LCA work and many LCAs include such guidance. The plan references in the Natural England document focus on the plan aspect being primarily concerned with informing future plan making and policy production – and the LCA will be of great importance in respect of future policy making. However, it is considered that the guidance that the LCA provides, through the “Plan” headings is also useful in respect of giving some pointers and assistance to those determining planning applications and indeed in respect of wider tasks, specifically including management. In providing the landscape guidance through the LCA it is acknowledged that any decision taker will need to take into account many other (non-landscape) matters when making decisions but as the LCA is concerned with landscape matters it is reasonable for it to address and concentrate on landscape matters and not comment on other considerations that maybe taken into account in respect of decision making; it should be seen as a given that a decision maker should take into account all relevant considerations, on all relevant topic, when arriving at decisions.</p>	<p>Whilst no substantive changes are seen as appropriate in respect of comments received there are a number of recommended changes, from these and other comments, that are set out in Appendix 2 to this report.</p>
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Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
		The LCA, in providing guidance, should be read alongside policy documents, specifically including the East Devon Local Plan, with, for example, Strategy 46 being explicitly concerned with landscape quality issues. Furthermore the guidelines in the LCA (to 'protect', 'manage' and 'plan') are consistent with requirements of the European Landscape Convention, which the UK Government ratified in law in 2007.	
	In their second key issue raised Bourne Leisure highlight that the LCA does not assess in detail the character of specific areas within those parcels. They consider that <i>“The LCA should be explicit on the limitations of the assessment, such as this one, and how this will affect its use in decision-making.”</i>	It is recognised that the LCA does not assess in detail the character of specific areas within the LCA. To do so on a comprehensive basis would not be reasonable (it would be hugely time consuming and expensive to seek to be universal in coverage). It is not considered, however, that there is any need to mention this point in the document, it is self-evidence from reading the LCA what matters and at what scale it does cover and by implication, therefore, what it does not cover. It should be noted, as well that the approach the LCA takes is a Devon-wide standard approach.	In response to the issues raised it is not recommended that any changes are made to the LCA.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Bourne Leisure makes explicit comment on LCT1b which is concerned with the Open Coastal plateaux. Much of Devon Cliffs Holiday Park falls in this landscape area.</p> <p>The LCA refer to impacts from coastal change management, including accommodating development at risk from coastal erosion, which the company welcomes. They consider that planning applications that arise, as a result of coastal change, should take account of all relevant policies.</p> <p>It's advised that <i>“Bourne Leisure considers that tourist accommodation comprises an important element of East Devon’s Open Coastal Plateaux LCT and that this type of development can be particularly vulnerable to coastal change by virtue of its location.”</i> They would wish to see flexibility for new development to be accommodated on the coastal plateau where existing uses may be threatened by coastal change. In this context they object to wording that seeks to retain (as undeveloped) the existing undeveloped landscape of the coastal plateaux.</p> <p>Bourne Leisure further object to references to resistance of expansion of coastal sites which can be seen in coastal views. This they regard as introducing planning policy through the LCA which they regard as inappropriate (they consider as worded the LCA would seek to wholly restrict new development) and they consider that planning decisions should be determined through consideration of all relevant matters. They suggest amendment to wording that in could allow for expansion of coastal sites unless such expansion <i>“would result in significant unacceptable harm to the LCT as a whole”</i>.</p>	<p>It is noted and recognised that if coastal change occurs this could impact on some facilities at Devon Cliffs Holiday Park (in crude terms some parts of the holiday park could be washed into the sea). National planning guidance and Local Plan policy give a clear steer on addressing coastal change (see for example Strategy 45 - Coastal Erosion). It would as a matter of course be appropriate for all relevant policies to be taken into account in determining any planning applications and the LCA does not need to point this out, rather, it is legitimate and appropriate for the LCA to address, as it does, landscape matters and considerations.</p> <p>In principle it is desirable for the coastal plateaux to be retained as undeveloped, it is a landscape type that is vulnerable to significant impacts as a result of development. Strategy 34 of the East Devon Local Plan, Undeveloped Coast and Coastal Preservation Area, affords specific protection for the undeveloped coast and land at and around Devon Cliff holiday Park falls in the defined policy area. The LCT guidance directly complements the overall policy approach of the East Devon Local Plan. It should also be noted that there are tourism policies in the Local Plan that would be specifically relevant to any new development at a holiday park.</p> <p>The change that Bourne Leisure suggest would establish a test that development would only be unacceptable if it adversely affected, in a significant way, the LCT as a whole. In this context it should be noted that this LCT is found a various points along the entire East Devon coast, specifically including up to East Devon boundary with Lyme Regis. A test, as suggested, would clearly be inappropriate.</p>	<p>In response to the issues raised it is not recommended that any changes are made to the LCA - other than in the description LCT 1B (boxed text under the LCT1B) to advise that the landscape type is “large scale and predominantly undeveloped”.</p>

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<p>Bourne Leisure makes explicit comment on LCT4H which is concerned with Cliffs. Parts of Devon Cliffs Holiday Park are in or near to this landscape area.</p> <p>Within the context of coastal erosion and the potential for loss of properties to the sea Bourne Leisure object to reference in the LCA to replacement of facilities “inland” as opposed to wording that they prefer that advises of replacement being appropriate <i>“landward of the eroded cliff edge”</i>.</p> <p>Bourne leisure also reiterate there concerns that <i>“the LCA should not be introducing policy and any decisions made on the acceptability of development must be done so in the context of all planning considerations.”</i> They continue by advising (quoting paragraph 168 of the NPPF) that The LCA <i>“should specifically acknowledge that it will be necessary to support the businesses along the developed coast in its response to coastal erosion.”</i> They propose wording that would explicitly support development (as opposed to resist development) <i>“provided that this would not result in significant unacceptable harm to the attributes that give the LCT its character as a whole”</i>.</p>	<p>As the coastal setting and environment is so sensitive it is generally going to be desirable to avoid development (including relocating where lost to erosion) at or close to the sea edge. For this reason “inland” (where topically adverse landscape impacts can be expected to be far less significant) is seen as appropriate and more desirable than (just) being to “landward of the eroded cliff edge”.</p> <p>Likewise it would also be inappropriate, given sensitivity issues and also the existing coastal protection that correctly exists to be open ended, as representations imply, about accommodating development along cliff (edges).</p>	In response to the issues raised it is not recommended that any changes are made to the LCA.
<a href="#">Marine Management Organisation</a>	The Marine Management Organisation advise that decisions that affect or might affect the UK marine area must be made in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan (the South Inshore and South Offshore Marine Plans) or UK Marine Policy Statement. In this context they highlight three specific issues, as reproduced below:	The general observations are noted.	No change.
	<i>“In section 1.6 we recommend reference to the South Marine Plan.”</i>	It is agreed that it would be beneficial to refer to the South Marine Plan at this point in the LCA.	Amend text, as suggested.
	<i>“Landscape Character Types (LCTs) LCT 4A, LCT 4B, LCT 4D, and LCT 4H do, or may have relevance to the South Marine Plan area. We recommend referencing the South Marine Plan as a consideration in these LCTs.”</i>	Include references in the LCA in the section that is headed “Relationship to other documents”.	Amend text, as suggested.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	<i>"As the Marine Policy Statement (MPS) states that references to seascape should be taken as meaning landscapes with views of the coast of seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other you may wish to consider the MMO's Seascape assessment for the South Marine Plan Areas in your landscape assessment. More information on seascape including maps of the South marine character areas and visual resource mapping can be found in the South Marine Plan Technical Annex on pages 113-119."</i>	Whilst a relevant document specific changes are not recommended to the LCA.	No change.
<a href="#">Natural England</a>	Natural England advise that they <i>"support development of the landscape character assessment and have no specific comments to make at this stage."</i>	Support is welcomed.	No change.
<a href="#">Otter Valley Association</a>	The Otter Valley Association highlight the LCA as being an excellent piece of work, though they highlight cases where development has occurred that is/would be contrary to the references relating to protection of skylines and ridges. They highlight that the value of the work lies at the point at which the document is used in practice. The Otter Valley Association highlight two issues that are summarised below:	The positive comments are noted and welcomed.	No change.
	<i>"The main difficulty with the document was in using the maps, as it is very hard to relate the map to the LCT categories, even when enlarged by 200%. Also the poor choice of colours were too similar and very hard to differentiate."</i>	The colours used on the maps follow a Devon wide standard and for this reason using differing colours would be inappropriate. However it is suggested that, in paper version, Map 3 can be usefully read alongside the specific maps for each landscape character type that show the relevant boundaries only for each area. Following adoption of the document the intent is that an interactive map will be placed on the Council web site. This will make it far easier to see boundaries.	Also a hyper-link will be provided to the Devon County websites/ and East Devon web site.
	<i>"The document does not fully address the archaeology on the LCT 1C, the Pebblebed Heaths, not does it highlight the serious damage to narrow lanes caused by modern tractors, in LCT 3B and other LCTs. Some of the sketches could have had more content."</i>	The adverse impacts that can arise from tractors are noted though it is not clear what further archaeological references would be appropriate. It is appropriate to put in a reference to tractors in the new forces for change section of the document	Amend text, as suggested.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Mr P Girling</a>	Mr Girling advises: <i>“Whenever has East Devon District Council taken any notice of the fact that the Blackdown Hills are in an AONB when it comes to making decisions to protect them i.e. Dunkeswell Kart Club, which is a blight on the landscape and responsible for Air and noise pollution and excessive traffic on our roads? Lets face it The area surrounding Dunkeswell Aerodrome is a dumping ground for all unpalatable enterprises. What a complete and utter waste of time and money”.</i>	It is not considered that the comments made are explicitly relevant to the LCA so no changes to the document are considered appropriate.	No change.
<a href="#">R Churchill</a>	Ruth Churchill advises <i>“have read through section 1 (I will look at the rest when I get some more time) comments so far: 1.1 paragraphs 2 &amp; 3 begin 'It' without any clarity as to the entity to which the pronoun refers. 1.4 final bullet refers to a menu and section 2.3. I looked at section 2.3 and it did not make the sentence any clearer - the only other time the word menu is used in the document is in section 2.4 (should the x-ref be corrected?)”</i>	Correct the typing errors.	Amend text, as suggested.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">Savills on behalf of Hallam Land Management Ltd</a>  These representations are specifically in respect of land on the south eastern edge of East Devon, in Uplyme parish, abutting the Dorset town of Lyme Regis.	<p>Hallam Land recognise the importance of LCA <i>“to provide a baseline understanding of the key landscape characteristics and types in East Devon”</i> and they also acknowledge that an update to the previous LCA is appropriate. However they express concerns around what they see as restrictive and inhibiting terminology.</p> <p>The land area that Hallam Land are specifically interested in falls in Landscape Character Type LCT 1B: Open Coastal Plateau. They highlight, for this land type, The Landscape Strategy states that it will <i>“Retain the Open Coastal Plateaux as a large scale and undeveloped landscape which forms a positive setting and skyline to the coast, World Heritage Site, South West/England Coast Path and several settlements”</i> and that <i>“Incursion of development onto higher land should be avoided.”</i> They consider that the LCA unreasonably expands on this to provide a restrictive approach to potential for accommodating development that does not consider wider, non-landscape, planning matters. These non-landscape matters, they highlight, include the need for housebuilding, and they consider that <i>“Lyme Regis is a town with an acute housing affordability issue with high house prices and relatively low average salaries”</i>. They also note that Lyme Regis <i>“is washed over by AONB landscape designations and with such constraints it is inevitable that future growth will have a degree of landscape impact wherever it is located.”</i></p> <p>Hallam land consider <i>“Given the challenges that Lyme Regis faces”</i> that the LCA should not explicitly seek to resist development in certain locations and rather the LCA should be more accommodating and use such language as <i>“maintain, conserve and enhance landscape character and minimise impact”</i> of development.</p>	<p>It is welcomed that a need for LCA updating is recognised. Whilst the concerns raised in the representation are noted it is considered that Hallam land are (perhaps) inferring an overarching importance to, and of the LCA, as being the only determinant of where and how future development might take place.</p> <p>Landscape Character Type 1B is extensive in scale, covering large expanses of coastal plateau land from Uplyme in the east to Exmouth in the west. Given its extensive nature it is appropriate for the LCA assessment to provide what is and can only be broad brush overarching comment and guidance that is applicable to a range of land areas where differing sets of circumstances may apply.</p> <p>In terms of assessing suitability of any land area for future development the LCA and its guidance will be one factor that is taken into account alongside all other relevant planning considerations. The LCA seeks to set out what is most appropriate in respect of landscape considerations but it is recognised that other considerations may pull in other directions.</p>	<p>Under Protect - 1B take the first two bullets under “Plan” and move to “Protect” – these read:</p> <ul style="list-style-type: none"> <li>• Retain the largely undeveloped character of the area.</li> <li>• Resist pressure to allow development on high ground which is currently undeveloped, and which forms the setting to settlements.</li> </ul>
<a href="#">South West Water</a>	South West Water advise that they have no comments.	Noted.	No change.
<a href="#">Taunton Deane Borough Council</a>	Taunton Deane Borough Council advise <i>“I note that part of the assessment covers Taunton Deane Borough District. I would agree with the assessment made in our district.”</i>	Noted.	No change.



Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
<a href="#">The Jurassic Coast Trust</a>	Jurassic Coast Trust advise that the LCA is <i>“an extremely useful piece of work for the ongoing management of the Jurassic Coast.”</i> they highlight the issues reproduced below:	Support is welcomed	No change.
	Page 25 - <i>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.</i>	It is agreed that text amendments would ensure the accuracy of the document.	Amend as suggested in representation.
	Page 25 - <i>What Makes it Special paragraph - the LCT doesn't exclusively form the setting of the WHS, only part of it.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	General comment - <i>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.</i>	Make minor amendments as suggested.	Amend as suggested in representation.
	Page 27 - <i>under 'plan' list - 6th bullet referring to quarries - in addition to landscape character and biodiversity quarry management and restoration plans should also enhance geodiversity.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 43 & Page 47 - <i>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.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 77 - <i>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.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.

Respondent	Officer Summary of Issues Raised	Officer Commentary on issues Raised	Summary of Recommend Change
	General Comment - <i>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.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 80/81 - <i>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.</i>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
	Page 82 - <i>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>	Comment is noted and agree with and changes are therefore recommended.	Amend as suggested in representation.
<a href="#">West Hill Parish Council</a>	West Hill Parish Council support the LCA, including in reference to the treed character of the village. They do, however, highlight a couple of typographical errors: “Page 29, 6th bullet point – it should be “West Hill woodland village”, not “West End woodland village”. Page 30, Future forces for change, last bullet point – again should be “West Hill”, not “West End”.	As this reference in the document is somewhat anomalous it is suggested that the bullet point is actually deleted.	Delete bullet pointed text.



## Appendix 2 – Additional proposed changes resulting from assessment of comments received

Whilst Appendix 1 highlights changes made in respect of specific comments received there were a number of comments about the role and application of the LCA that generate the need for additional further recommended changes.

A concern was raised, in respect of the LCA and making planning decisions (including policy choices and determining planning applications) that the LCA was presenting matters in a way that may be interpreted or considered to be the only body of evidence and technical guidance that should apply. This of course is not the case and any decision taken will need to weigh-up all of the relevant planning considerations, be they landscape, other environmental, social or economic when arriving at conclusions. To ensure there is no ambiguity a recommended change is proposed to the document, with a new paragraph, 1.7 to read:

### 1.7 Use of the LCA in decision making

The LCA provides a robust evidential landscape baseline to inform future decisions and does not set out policy and it should be considered as one of a number of material planning considerations when considering any planning matter. It will need to be seen and set alongside wider matters including other environmental, social and economic considerations in the decision making process. In this context Natural English guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/691184/landscape-character-assessment.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf)

advises: *“The results of a Landscape Character Assessment often form part of an evidence base, for example for a development plan and its policies and allocations, or the baseline for a Landscape Impact and Visual Impact Assessment (LVIA) as part of an Environmental Impact Assessment (EIA) of a proposed development. The information is therefore used in circumstances where the results are subject to public scrutiny and debate, such as at public inquiries or examinations in public”*. References to the sub-heading “Plan” under the heading of “Landscape Management Guidelines” for each landscape character type in the LCA should be read in this context.

Further to this change it is also recommended that:

Throughout the document there are boxes, for each landscape character type, that are titled ‘Landscape Strategy’ these are recommended for should be re-labelled to ‘Landscape Aim/s’ – this highlights that the text in the boxes form aims rather than ‘strategy’ (in this context a strategy is akin to being a policy).

and

Throughout the document, for each landscape character type, there is a heading of 'Landscape Management and Planning Guidelines'. These should be renamed to read 'Landscape Guidelines'.

Also document title of document to be called "East Devon and Blackdown Hill Landscape Character Assessment".

The most significant change to the document is, however, inclusion of a new section called 'Forces for Change' (see paragraph 1.6 near to the front of the report). This new section, which incorporates a number of recommended changes to the LCA highlighted in this report, sets out the key activities that may bring about landscape change in the future and provides commentary on these. Specific subject matters that could bring about change that are commented on are;

- Development pressure;
- Renewable Energy;
- Recreation Pressure;
- Rural Lanes (specifically from increased vehicle sizes and activity);
- Declining water and soil quality;
- Agricultural management and habitat connectivity;
- Natural processes (from coastal erosion and also inland away from the coast); and
- Climate change.

It is, however, also highlighted that there are many positive landscape changes taking place.