

East Devon Local Plan – Topic Paper

Chapter 12. Our outstanding landscape

Audit trail local plan evolution document and consultation statement

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1 Introduction

- 1.1 This topic paper sits behind and helps explain the content of and evolution of the Publication draft of the East Devon Local Plan.
- 1.2 There may be new versions of this topic paper as plan making progresses into and through plan Examination.
- 1.3 This topic paper specifically addresses Chapter 12 of the plan – our outstanding landscape.

2 The Publication draft of the Local Plan

- 2.1 This report is a redraft of an earlier report and in revised form it is specifically concerned with supporting the local plan at the Regulation 19 stage of plan making work. There are specific Government regulations that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).
- 2.2 The proposed Publication draft text of the local plan is an edited and amended draft of the consultation draft plan published in November 2022. The draft plan was consulted on under plan making Regulation 18 with further limited additional consultation under this regulation in the Spring of 2024.

3 Summary of proposed redrafting of Chapter 12 of the consultation plan

- 3.1 Chapter 12 has been subject to minor changes in response to feedback received and further technical work.

4 Issues and options consultation

- 4.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options¹ report. This included a series of questions that responds and comments were invited on. A feedback report was published².

¹ [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

² [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

- 4.2 The consultation set out the importance of protecting our valued landscapes and the potential limitations this may place on how much and where development should be placed. The questionnaire sought views on the levels of restriction that would be favoured. At that time other matters now covered by the policy, such as pollution, land contamination and agricultural land quality, were not consulted on (these policies were proposed later).
- 4.3 The most popular option was allowing for development to meet local needs with 46%. 31% of respondents supported a very restrictive approach. Only a small number of respondents – 7% supported greater levels of development and 5% supported none of the proposed options. A number of people supporting option 2 felt that small scale development could enhance villages and offer opportunities for local self-builders. Many responding with option 1 felt that protected areas were protected for a reason and that large scale growth should be directed to less sensitive areas. Those responding often commented that protected areas could sustain more development if done well and it might rebalance large scale growth in the west end of the district and protect services and facilities.
- 4.4 Lots of other comments were received and are touched on below:
- Neighbourhood Plans need to be taken into account.
 - We need to maintain green spaces in and around villages.
 - East Devon should look into national park designation.
 - Brownfield sites should be considered before greenfield.
 - AONB boundaries are often arbitrarily drawn and there should be a more nuanced test as to whether development is appropriate.

5 Draft plan consultation

- 5.1 In the draft plan consultation, landscape and soil quality/pollution matters were addressed in Chapter 12. The feedback report, summarising the comments can be read here (starting on page 425) [accessible-reg-18-consultation-feedback-report-spring-2023.pdf](https://www.eastdevon.gov.uk/accessible-reg-18-consultation-feedback-report-spring-2023.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk)).
- 5.2 Given the wide range of policy matters covered in this chapter, responses were received from a variety of individuals and notable organisations, including Natural England, the AONB teams, National Farmers Union, CPRE and the Environment Agency covering many issues. The policies were overwhelmingly supported, however there was concern that some policies needed to specifically identify the features to be protected (eg individual landscape features) and that, given the scale of some designations, some/more development should be permitted within them. There was also concern that a new town and additional development in the West End of the District would be likely to take place on the highest quality agricultural land, given that most undeveloped land in that area is grade 1, 2 or 3a. It was also pointed out that, within areas protected for their landscape/visual/amenity value there is scope to carry out climate change

mitigation and to deliver biodiversity and green infrastructure and these issues aren't currently covered by policy.

- 5.3 It is advised that the Council have undertaken detailed site assessment work (with landscape being a specific focus). This work was being undertaken with support and advice from the Council's Landscape Architect and with reference to the Devon and Local Landscape Character Areas. The evidence to date and to be produced will be considered to be robust.

6 Further Regulation 18 consultation Spring 2024

- 6.1 At the time of drafting this report further Regulation 18 consultation on selected topic matters was taking place. Two landscape matters, Green Wedges and the Coastal Preservation Area were amongst matters being consulted on. Should other matters pertaining to landscape be noted in feedback they will be reported on in any redrafting.

6.2 Coastal Preservation Areas

In the draft local plan policy wording was suggested but the potential boundary shown on the map was taken from the existing, adopted local plan. It was made clear that further assessment work would need to be undertaken and an updated boundary would be consulted on once that work had been undertaken. In line with an updated methodology, that work has now been completed and the proposed new boundary was consulted on in Spring 2024. Almost 500 responses were received.

Most responses related to the appropriateness of allocating sites for development within the CPA, with mixed views as to whether these sites should be excluded from the boundary or not allocated at all. Generally, the CPA as a policy approach was viewed extremely positively and development in it was viewed very negatively. There were also a number of general comments regarding the CPA policy and requests for the boundary to be amended to include/exclude specific areas of land.

6.3 Green Wedges

In the draft local plan policy wording was suggested but the potential boundaries shown on the map were taken from the existing, adopted local plan. It was made clear that further assessment work would need to be undertaken and updated boundaries would be consulted on once that work had been undertaken. Members subsequently agreed that the existing local plan boundaries, and green wedge equivalent boundaries in made neighbourhood plans, should form the basis of this consultation. Around 700 responses were received.

As with the CPA boundaries, most responses related to the appropriateness of allocating sites for development within the Green Wedges, with mixed views as to whether these sites should be excluded from the boundary or not allocated at all. Generally, the Green Wedge policy approach was viewed extremely positively and development in it was viewed very negatively. There were also a number of general comments regarding the policy and requests for the boundaries to be amended or green wedges to be identified in additional locations.

7 Sustainability Appraisal feedback

- 7.1 The draft local plan was supported by a Sustainability Appraisal³ (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.
- 7.2 The policies in this Chapter cover a range of landscape, natural environment, pollution and agricultural land quality matters. In all cases, the proposed policies were considered preferable to the alternatives due to numerous and wide ranging benefits relating to biodiversity, landscape, the historic and built environment, land/water resources and health. The specific alternatives that were assessed, and the reasons for their dismissal, are as follows (Note- all of the policies were assessed but alternatives were only considered where they were specifically identified in the consultation plan) :
- Do not include a policy to protect **landscape features** – this alternative would result in some uncertainty on the positive effects for objective 2, so is rejected.
 - Do not include a policy to protect **AONBs** – although AONBs are afforded protection in legislation and by the NPPF, given that two thirds of East Devon is designated as AONB, this alternative could reduce the positive effects and cause uncertainty.
 - Do not have **green wedges** – this alternative is rejected as it would result in negative effects on landscape (objective 2) as could potentially lead to settlement coalescence. It would also have less positive effects in relation to associated benefits of green wedges, such as flood management, recreation and biodiversity.
 - Have more extensive **green wedges** – this is rejected as it would go beyond the area of land required to avoid settlement coalescence and protect the character of settlements in close proximity to each other, and would lead to negative impacts on housing (objective 8) and employment land (objective 11) delivery.
 - Do not include a policy on **land of local amenity importance or Local Green Space** – this would cause negative uncertain effects on biodiversity (objective 1) and landscape (objective 2), due to potential for the 14 areas designated as land of local amenity important to be under pressure from development given their location in settlement boundaries; and less positive effects in relation to the policy approach in areas designated as Local Green Space. Therefore, this alternative is rejected.

8 Habitat Regulation Assessment

- 8.1 The local plan will need to be assessed under the Habitat Regulations. An preliminary assessment of policies in the draft plan has been produced – [east-devon-local-plan-hra-110723-2013-doc-from-footprint.pdf \(eastdevon.gov.uk\)](#)

³ [sa-of-pos-consultation-draft-lp_2022.pdf \(eastdevon.gov.uk\)](#)

9 Assessment of policies in chapter 12

9.1 Chapter 12 of the draft plan set out a series of policies that are reviewed below.

General issues raised on Chapter 12

The importance of, and need to protect, the natural environment and high quality landscapes in East Devon was supported very strongly. Many respondents, at all stages of plan making, reiterated this and it was raised as a consideration in response to many of the policies in the Plan (not just those in Chapter 12).

The Policies in this Chapter focus on protecting areas, features and matters of particular environmental importance, whether they are identified specifically on the policies map or not. The need to safeguard natural resources was raised as a significant issue and the plan includes policies to protect agricultural land, particularly for future food production, avoid or remediate contaminated land and prevent pollution, in addition to policies protecting green space, special features, landscapes and coastal areas.

Issues and options consultation

Question 20 sought views on the levels of restriction that would be favoured.

The most popular option was allowing for development to meet local needs with 46%. 31% of respondents supported a very restrictive approach. Only a small number of respondents – 7% supported greater levels of development and 5% supported none of the proposed options. A number of people supporting option 2 felt that small scale development could enhance villages and offer opportunities for local self-builders. Many responding with option 1 felt that protected areas were protected for a reason and that large scale growth should be directed to less sensitive areas. Those responding to question 3 often commented that protected areas could sustain more development if done well and it might rebalance large scale growth in the west end of the district and protect services and facilities.

Officer commentary in response:

The responses were taken into account in writing the Chapter 12 policies.

<p>Lots of other comments were received under option 4 and are touched on below:</p> <ul style="list-style-type: none"> • Neighbourhood Plans need to be taken into account • We need to maintain green spaces in and around villages • East Devon should look into national park designation • Brownfield sites should be considered before greenfield • AONB boundaries are often arbitrarily drawn and there should be a more nuanced test as to whether development is appropriate. 	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Policies in this Chapter were strongly supported. There were some requests for wording changes and minor additions but overall the policies were seen as very important to maintaining a high-quality environment. • Numerous respondents supported the protective nature of the landscape policies but felt these were at odds with other policies of the Plan, particularly those supporting or allocating additional housing, employment or solar development. The sentiment was that these will inevitably lead to the loss of greenfield sites and will impact on the visual appearance and character of the landscape. <p>Woodbury Parish Council submit nine maps showing where and how the countryside should receive further protection across the parish and beyond, by increasing public footpaths,</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The responses were noted and the policy amendments were incorporated where it was felt that they positively contributed to the aims of the policy or for clarity. • It is acknowledged that development will inevitably change the character and appearance of the landscape, however these protective policies are intended to ensure that this is done in an acceptable way. • Woodbury PC are in the process of producing a neighbourhood plan and have been advised that they can protect these features through local policies.

quiet lanes, public open space, green wedges, public access woodland.	
Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: <ul style="list-style-type: none"> • None raised at this time 	
Sustainability Appraisal	
<ul style="list-style-type: none"> • See Sustainability Appraisal table below. 	<ul style="list-style-type: none"> • No specific matters raised.
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> • No general concerns raised. 	Officer commentary in response: <ul style="list-style-type: none"> • No comments.
Commentary on policy redrafting for the Publication Plan	
There were no changes required as a consequence of general observations about the Chapter.	

Strategic Policy 74 – Landscape Features
This overarching policy aims to protect important features in the landscape, whether designated or not. A key objective of the Local Plan is to conserve and enhance the environment, the landscape, historic character and archaeological value and its wildlife, agricultural, recreational and natural resource value of countryside areas. This policy establishes that all development in the countryside should have regard to the District Landscape Characterisation Assessment (LCA), so as to take account of the different roles and character of different areas and be accompanied by a proportionate Landscape Appraisal.
Issues and options consultation

See General Issues above.	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The policy is considered to be important by respondents and most comments expressed concern that new development could be detrimental to important landscape features and/or suggested additional features to be included in policy. • The East Devon AONB team support this policy. • Devon County Council recommend the policy is amended to refer to “valued landscape attributes” and “special features and qualities” as evidenced in the Devon-wide Landscape Character Assessment. <p>More detailed points included:</p> <ul style="list-style-type: none"> • High quality landscape is vital to East Devon's economy, sense of place and at the root of wellbeing in the District. Protecting and enhancing must have a very high priority in the Plan. • A number of respondents felt that proposals for new development undermine countryside protection policies. • A large area of countryside will be lost to the new town and this was considered to conflict with countryside protection objectives. • Disingenuous to suggest that developing greenfields will provide more green space. • This policy should make clear that it applies to all proposed 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The importance and support for this policy are noted. There is an extensive list of features and considerations that respondents have suggested should be taken into account and it is considered that a comprehensive list of these would be excessive and unnecessary. Instead, a more succinct, but all encompassing, policy wording would ensure that all of these important considerations can be taken into account on a case-by-case basis. • Policy has been amended to refer to valued landscape attributes and special features and qualities as evidenced in the Devon-wide Landscape Character Assessment • The Environmental Improvement Plan and Plan Biosecurity Strategy are recognised and supported however they are not directly related to this policy and applicants can't be required to adhere to them • It is agreed that a more appropriate approach is for the applicant to demonstrate through a landscape appraisal that development would protect and enhance features and qualities that contribute to the character of East Devon's landscapes and not harm the distinctive landscape, amenity and environmental qualities within which it is located, having regard to the relevant published Landscape Characterisation Assessments as a basis for understanding, maintaining and enhancing local distinctiveness and landscape character.

<p>developments including land allocations and proposed development put forward through the LP.</p> <ul style="list-style-type: none">• The landscape, countryside and rural area should be protected from light pollution and development detrimental to tranquillity.• Need to refer to the Environmental Improvement Plan being published in Jan' 2023. Sitting at the heart of the government's Environment Act, its targets will include; to halt the decline in species populations by 2030, restore precious water bodies to their natural state; and boost nature recovery by increasing tree and woodland cover.• Need to refer to the Plant Biosecurity Strategy published 9th January 2023. The strategy sets out how more than 30 signatories, including Defra, the Royal Horticultural Society, National Farmers Union and the Woodland Trust, will deliver an ambitious programme of behavioural change across society through the Public Engagement in Plant Health Accord.• Climate change and protection of habitat should be prioritised• The text refers to landscape appraisal/LVIA, it is suggested that further guidance be prepared on what will be required to demonstrate that a development will protect and enhance features.• All High Distinctiveness Habitat should be strongly protected and not just trees and hedgerows or Irreplaceable Habitat.• There is no need to include Best and Most Versatile Agricultural Land in this list given that it is covered by '83.	
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<p>Policy - Development on High Quality Agricultural Land’.</p> <ul style="list-style-type: none">• Support protection of trees and hedgerows. Replacement will not compensate for loss of mature trees or ancient hedgerows.• Concern that trees and hedgerows are removed without penalty, and that replacement/mitigation isn’t properly monitored or enforced.• Archaeological features should be referred to.• Sites should not be allocated within the AONB’s.• Important lowland heath should be referred to.• There is no commitment to control solar farm developments. Developers are taking advantage of the maximum size allowed before government approval required.• Concern was specifically raised in respect of landscape features on, or around, sites at Littleham, Exmouth, Whimble, Colyton, Yarty Valley and the Axe Valley.• Devon Wildlife Trust consider that the list of features that contribute to the nature and quality of East Devon’s landscapes should be expanded to include wildlife corridors which must not be subject to impacts from lighting. Furthermore, the list should include ‘the development must deliver a minimum 20% biodiversity net gain’. They also provide specific suggested policy wording amendments.• A developer recommends criterion a) is deleted as it conflicts with policy 85 which priorities protection of certain trees rather than all trees; and sometimes tree removal can be beneficial.	
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<ul style="list-style-type: none"> A developer states the provision of homes and employment carries substantial weight in the planning balance when considered against the lack of robust housing and employment land supply in EDDC and across the subregion. This policy needs to be applied flexibly in recognition of this shortfall; this is especially the case in areas outside of the AONB which are less sensitive to change. 	
Supplementary Regulation 18 consultation Spring 2024	
<ul style="list-style-type: none"> This policy was not consulted on at this time 	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> No concerns were raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> No response/actions identified as needed. Comments noted Environmentally positive policy that will protect rural areas from development.
Commentary on policy redrafting for the Publication Plan	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> Policy OL 01 – Landscape features 	
<p>The policy has been rewritten so that it no longer lists a wide range of considerations but, instead sets out four key areas which applicants should address. It requires applicants to submit a proportionate Landscape Appraisal to demonstrate how the policy requirements will be met and advises applicants to have regard to the Landscape Character Assessments in doing so. This approach is supported by the Council’s Landscape Architect and Development Management Team as being rigorous enough to ensure that landscape features are adequately protected without being unduly</p>	

prescriptive or onerous.

The Strategic Planning Committee resolved at their meeting on 9th October 2024 that reference to trees and woodlands should be added to the policy and reference to the council’s Tree Strategy should be added to the justification text.

Strategic Policy 75 – National Landscapes (Areas of Outstanding Natural Beauty)

Policy is required to ensure that the District’s AONBs/National Landscapes are protected and conserved in accordance with the Countryside and Rights of Way Act 2000 (CROW Act), Levelling Up and Regeneration Act 2023 and the NPPF.

Policy ensures that the highest level of protection is given to AONB’s/National Landscapes and development within or affecting them will only be permitted where it conserves and enhances the natural beauty of the designated area.

Issues and options consultation

See General Issues above

Draft Plan Consultation

Key issues raised in consultation:

- Policy is well supported. Numerous respondents expressed concern about the quality/quantity and impact of new development on the AONB’s.
- The East Devon AONB team support this policy and the justification paragraphs 12.4, 12.5 and 12.9 supporting local landscape character assessments and LVIA’s but would encourage a clarification of how the setting of an AONB is considered.

More detailed comments included:

Officer commentary in response:

- The importance and support for this policy is noted.
- Some respondents have suggested changes that go beyond the scope of the Local Plan, for example presuming against all new development in the AONB/National Landscape, reviewing the boundaries (this can only be done by the Secretary of State).
- There is an extensive list of matters that respondents have suggested should be reflected in policy and it is considered that a comprehensive list of these would be excessive and unnecessary. Instead, a more

<ul style="list-style-type: none">• The Blackdown Hills AONB Partnership welcomed the reference to AONB management plans and the AONB Teams are happy to work with officers to refine and develop the policy further. They request clarification on defining the setting of the AONBs, and also how it will be determined whether development proposals could affect the special qualities of an AONB.• The National Farmers Union state within the landscape protection these areas are granted, it is vital that these farm businesses are allowed to develop where needed, in order to remain viable. Within this policy there should be specific provision for what agricultural businesses deliver for the AONBs in terms of landscape management and development that allows them to continue should have specific regard.• Devon County Council state the third bullet point should refer to scope for mitigation and whether there is potential for significant effects to reflect the NPPF.• Lyme Regis Town Council support protection of areas through AONB status but do not support national park designation for either East Devon or neighbouring parts of Dorset.• A number of respondents felt that sites in, or impacting on, AONBs should not be allocated. Some additional comments said that no major development should be considered in the AONB and that this is not in the public interest and/or exceptional circumstances should not apply. Point 3 should make clear that major development should not be permitted within the AONB.	<p>succinct, but all encompassing, policy wording reflects the requirements of the NPPF and ensures that impact on the AONBs/National Landscapes can be taken into account on a case-by-case basis.</p> <ul style="list-style-type: none">• Reference has been included to the policy considerations also applying to the heritage coast. It was considered appropriate to include the heritage coast in this policy as the NPPF states “191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.” The designated areas mentioned in Para 189 include National Landscapes, and they extend over the full Heritage Coast area, so the policy considerations are appropriate to both. The other ‘coastal’ protection policies- Coastal Preservation Areas and World Heritage Site do not fully cover/extend over the Heritage Coast area and have similar but different policy requirements.
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- Prominent new development, within and/or highly visible from, the AONB is not supported. Anything visible from an AONB must be rigorously analysed for visual impact prior to planning approval, as per latest govt. guidelines
- The Policy should make clear that it applies to all proposed developments including land allocations and proposals in the Local Plan.
- The landscape, countryside and rural area should be protected from light pollution.
- Several respondents said that allowing developments that impact upon the AONB on the basis of their economic benefit is not justified.
- Many areas outside AONBs are just as beautiful and being overdeveloped (Hawkchurch and Whimple were given as examples). These areas require protection too. AONBs should take a greater share of this rural development.
- AONBs need appropriate development to enable a mixed demographic, local employment etc. Limiting development in such areas produces a huge demographic imbalance and divorce young families from their extended families and support networks. This is socially damaging.
- Why do the AONB's have such a high degree of protection given their limited public access and a lack of public facilities.
- The Local Plan should allow absolutely no development beyond the settlement boundaries (eg Sidmouth, Sidford, & Sidbury) otherwise there is a real threat to the AONB. Recent developments on edges of towns have encroached on the AONB.

<ul style="list-style-type: none">• There should be a review of the AONB boundaries urgently and additional land should be brought into the protection of the AONB where appropriate.• The impact of the Levelling Up and Regeneration Bill currently going through parliament should be fully assessed before committing to damaging allocations in AONB's.• All of the construction will cause adverse effects on the AONBs from increased emissions for the next 20+ years.• Tourism is a major source of income to our area but developing the AONBs will deter visitors• Monitoring development in AONB and enforcing conditions is important• The AONB forms part of the UNESCO World Heritage Site along the Jurassic Coast and needs protecting from further development. The South West Coast Path is an important walkway for all ages and also needs its access protecting for future generations• Accepting that some AONB development is needed, this should be sensitively designed small scale development rather than large housing estates of repetitive styles. Large allocations are not supported as more modest scale and higher quality would sit better within the landscape.• Some representations referred to specific proposed site allocations, for example at Whimple, Colyton, Sidmouth and Exmouth. These matters will be considered as part of the site specific considerations.• Undeveloped heritage coast requires policy consideration	
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Supplementary Regulation 18 consultation Spring 2024	
This policy was not subject to consultation at that time	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No concerns were raised. 	Officer commentary in response: <ul style="list-style-type: none"> No response/actions identified as needed. Comment advised AONB management plans will be integral to decision making.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: <ul style="list-style-type: none"> Strategic Policy OL 02 – National Landscapes (Areas of Outstanding Natural Beauty) 	
<p>The policy has undergone revision. It has been rewritten to reflect the change of name so that it now refers to National Landscapes (although AONB is still acknowledged in the title as that terminology was still being used in the NPPF at the time of policy writing).</p> <p>The requirement for a Landscape and Visual Impact Assessment has been deleted as this duplicates the requirement in the Landscape Features policy that will apply to all applications (noting that the requirement is proportionate, so a very light touch assessment may apply eg in urban areas).</p> <p>The requirement for development in an AONB to be appropriate to the economic and environmental wellbeing of the area or promote understanding or enjoyment of the AONB has been deleted as this would preclude certain types of appropriate development eg social housing. Instead, the AONB/NL management plans will be a material consideration and their stance on these matters will inform decisions on a case-by-case basis. Wording has also been updated to reflect the guidance published in late 2024 Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK (www.gov.uk) to ensure that the Councils duties are met.</p> <p>This approach is supported by the Council’s Landscape Architect and Development Management Team.</p>	

Strategic Policy 76 – Coastal Preservation Areas	
<p>The majority of the coastline of East Devon is inscribed by UNESCO as being of international importance, recognised by its status as part of the Jurassic Coast World Heritage Site. Whilst the WHS was chosen for the outstanding value of its rocks, fossils and landforms the wider setting of the cliffs contribute significantly to the landscape (which is, itself, part of the landform). The NPPF (para. 174c) requires local authorities to “maintain the character of the undeveloped coast, while improving public access to it where appropriate”. Alongside other local authorities in Devon, the councils have decided to define the Undeveloped Coast through policy designation, to allow the consistent application of this NPPF principle. Policy in the plan protects the character of the undeveloped coast (including the WHS) and designates a Coastal Preservation Area. This local designation is based on a detailed character assessment of undeveloped coast in terms of openness and views to and from the sea.</p> <p>In East Devon the Undeveloped Coast is designated as Coastal Preservation Area (CPA) in the Local Plan. The CPA is a longstanding designation that has featured in several adopted Local Plans (including the current one). The CPA is a policy to protect the finite resource of the undeveloped coast from development. Restrictions against development in CPAs are stronger than those for Areas of Outstanding Natural Beauty (AONBs). Areas for inclusion within the CPA should be substantially unaffected by development, and should be generally either visible from cliff top, beach, sea or estuary, or form part of the view from significant lengths of an access road, public footpath or bridleway leading to the coast or from the long-distance coastal footpath. The Review ensured that areas within the CPA meet these requirements.</p>	
Issues and options consultation	
See General Issues above.	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> The policy is well supported with a general opinion that coastal preservation areas should not be built in <p>More detailed comments included:</p> <ul style="list-style-type: none"> The Environment Agency consider it would be good if the policy included an additional ‘purpose’ of the green wedges to help communities to adapt and be more resilience to climate change should be added. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> The Policy has not been amended as it is considered that, as worded, it achieves the objective of maintaining the character of the undeveloped coast. The text has made clear that a review of the CPA extent will be undertaken to ensure that the area it relates to remains appropriate. For the purposes of the consultation the existing, adopted policy map indicates the broad area which is likely to be protected.

<ul style="list-style-type: none">• Devon County Council are not aware of the detailed assessment (paragraph 12.7) but note landscape character is broader than openness and views to and from the sea only.• Coastal areas must be protected for wildlife as well as people - every effort should be made to make sure that marine and coastal wildlife is not adversely affected by changes (increases) in human activity - eg increased noise, lighting, movement or pollution of coastal area.• Although public access is important, owners of dogs are frequently insensitive to the need to control them to avoid disturbance to species of biodiversity importance or to other non dog owners. This includes damage caused by dog fouling.• Appropriate proposals for increased public access must exclude access that adversely affects existing homes and infrastructure• Is there potential conflict between this policy and the rural farm diversification policy?• The policy should be strengthened. Some housing allocations will destroy the openness to and from the sea and so should not be allowed. Has this been assessed?• Anything affecting the health and biodiversity of the coast, as well as the views, should be included in its protection. Sewage, road and agricultural run-off should not be permitted to enter the rivers or sea.• Concern that the scale of development proposed is going to cause sewage overflows onto all the surrounding coastal areas.	
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<ul style="list-style-type: none"> • The coast of East Devon is unique in its visual and geological form, it needs to be carefully managed and protected to ensure it continues to be a valuable attraction for visitors - as well as providing vital habitat for biodiversity. • Visual openness is extremely important to those who wish to enjoy the coast path and country walks. • A review is long overdue. Past errors, and intrusive development, should be corrected. • Much of our coastline is protected by ownership e.g. the National Trust, but the need to prevent overdevelopment and inappropriate development is clear. • It is unclear from the Policies Maps where the boundary of the CPA lies around the area of Seaton Hole. The mudstone cliffs must be protected as they are prone to collapse from above as well as from coastal erosion from below. Policy should recognise that water flows from above must be identified and managed properly as well as proper building controls ie risk assessment for proposed groundwork and heavy plant usage near these cliffs. • Littleham brook (north of Maer lane) should be within the CPA. This whole area represents a significant and necessary floodplain for runoff for this side of Exmouth. 	
Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Summary: The responses to the question about the proposed Coastal Preservation Area (CPA) reveal a strong sentiment towards protecting and preserving coastal areas in East 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The high level of support for the Coastal Preservation Area policy is welcomed. A rigorous methodology has been followed in designating the area and the high degree of protection it confers will address many

<p>Devon. Many respondents express concerns about development within these areas, emphasizing the importance of maintaining natural beauty, wildlife habitats, and recreational spaces. There are also significant worries about infrastructure capacity, particularly regarding roads, sewage systems, and local services. While some support the proposed CPA extensions, others feel the area is too large or may hinder necessary development. The comments reflect a tension between preservation and development needs, with many calling for a balanced approach that prioritizes environmental protection.</p> <p>Key points raised, in order of frequency:</p> <p><i>Environmental and landscape protection</i></p> <ul style="list-style-type: none"> • Importance of preserving natural beauty, wildlife habitats, and biodiversity • Calls to protect green spaces and farmland • Concerns about irreversible damage to ecosystems <p><i>Opposition to development in CPA/protected areas</i></p> <ul style="list-style-type: none"> • Criticism of considering development in preserved areas • Concerns about setting precedents for future development • Calls to maintain existing CPA boundaries <p><i>Infrastructure concerns</i></p> <ul style="list-style-type: none"> • Inadequate roads, schools, healthcare facilities, and sewage systems • Inability of current infrastructure to support additional housing • Specific concerns about sewage treatment and water management <p><i>Recreational value and public access</i></p>	<p>of the respondents concerns about development within these areas and loss of landscape character, habitat etc. Requests to extend the CPA have been considered but discounted as they do not have a sufficiently strong relationship with the sea to warrant protection on this basis.</p> <ul style="list-style-type: none"> • It is not considered necessary to amend the CPA boundary or the policy in light of the responses. • Where the choice has been made to allocate sites that were in the Coastal Preservation Area as consulted on the boundary has been redrawn to exclude such sites from the defined area. • Note- a large number of responses were submitted in relation to potentially allocating sites for development within the CPA. The policy implications were considered in redrafting this policy, however individual matters raised were considered on a site specific basis, rather than being addressed here.
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<ul style="list-style-type: none"> • Importance of maintaining areas for walking, cycling, and public enjoyment • Value of open spaces for community well-being and mental health <p><i>Support for CPA expansion or maintenance</i></p> <ul style="list-style-type: none"> • Calls to extend or maintain current CPA boundaries • Recognition of the CPA's importance for future generations <p><i>Local character and tourism</i></p> <ul style="list-style-type: none"> • Concerns about overdevelopment impacting local character • Importance of preserving natural areas for tourism <p><i>Traffic and congestion issues</i></p> <ul style="list-style-type: none"> • Worries about increased traffic on local roads • Existing congestion problems, particularly in Exmouth <p><i>Affordable housing and development needs</i></p> <ul style="list-style-type: none"> • Recognition of housing needs, particularly for local and young people • Calls for focus on brownfield sites or urban extensions instead of CPA areas <p><i>Criticisms of CPA extent or implementation</i></p> <ul style="list-style-type: none"> • Concerns that proposed CPA is too large or extends too far inland • Questions about the criteria used for CPA designation 	
<p>Sustainability Appraisal</p>	
<p>Outcome of sustainability appraisal:</p> <p>Preferred alternative: Option A. Include a Coastal Preservation</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • This is the option that has been agreed.

<p>Areas policy and identify on the Policies Map.</p> <p>Reasons for alternatives being preferred or rejected: Option A. Include a Coastal Preservation Areas policy and identify on the Policies Map is preferred due to major positive effects upon biodiversity, landscape, and the historic environment, along with minor positive effects on climate change adaptation, land resources, and health and well-being</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation: No concerns were raised.</p>	<p>Officer commentary in response: No response/actions identified as needed.</p>
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Strategic Policy OL 03 – Coastal Preservation Areas 	
<p>The Policy has been very slightly amended to better reflect the NPPF wording. A detailed assessment has been undertaken and this has confirmed the area that it is appropriate to designate. The wording as proposed achieves the NPPF objectives- to maintain the character of the undeveloped coast, while improving public access to it where appropriate.</p>	

<p>Strategic Policy 77 – Areas of Strategic Visual Importance</p>	
<p>The purpose of the policy is to ensure that development does not harm important views or landmarks, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic</p>	

<p>of much of East Devon. The policy requires an appropriate site based assessment to be undertaken in most cases.</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The policy is well supported with numerous comments that views are important to local and District character. It was also noted that views were considered important in Neighbourhood Plan consultation feedback. • The East Devon AONB team support the Policy but are unclear as to how these ‘strategic’ areas or view type have or will be identified and mapped and how they will be evidenced in respect of any particular development. They are happy to work with Policy officers to develop this Policy further to enable the key view ‘types’ or areas across the AONBs to be identified. <p>More detailed comments included:</p> <ul style="list-style-type: none"> • Several respondents refer to the need to prevent light, noise and/or substance pollution and enforce if necessary. • EDDC must insist that areas of strategic importance are preserved. There should be no exceptions to this. • An exception should be made for solar and wind farms which may impact visually on a landscape, but are too important to be turned down solely for this reason. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Support for this policy is welcomed. Various changes to the policy have been suggested including the need to map the views and to expand the considerations to take account of further factors. Conversely, some respondents felt that harm to views should not be assessed on a cumulative basis and that change should not always be considered harmful. • Given the high quality of East Devon’s landscape and the numerous important views and vistas it is not considered possible to identify them individually or comprehensively on a map. In any case, impact will vary depending on the height and type of development and different vantage points. • It is considered that, as written, the policy is sufficiently comprehensive and robust that decision makers could apply it on a case-by-case basis and identify relevant views and features that are specifically relevant to a proposal.

- The Blackdown Hills AONB Partnership would like clarity as to how the 'strategic' areas/views have been identified and whether they can be mapped and be evidenced in respect of any particular development. They recognise that views are a special AONB quality and are happy to work with officers to develop this policy further.
- Need clarity as to how these views are different to point j. in policy 74.
- Support reference to the study 'what makes a view' in paragraph 12.9, but need to clarify that it is Blackdown Hills AONB specific.
- Policies need to be strengthened and written specifically into Policy 32 to prevent future industrialisation of the countryside.
- AONB landscapes require particular protection and are of high visual importance
- The new town is contrary to this policy as it will cause light pollution, noise pollution, traffic pollution and a detriment to the enjoyment of the area.
- Anything affecting the health and biodiversity of the coast, as well as the views, should be included in its protection. Sewage, road and agricultural run-off should not be permitted to enter the rivers or sea.
- Development will damage landscapes even if visual impact is low.
- Specific views were referred to, including Woodland Trust's new woodland at Yonder Oak, Whimple and Littleham and the Maer Valley in Exmouth.

- Agents for Bourne Leisure objects to policy noting it refers to “key views and views of local landmarks” but without specifically identifying or designating them. Items a and b of draft Policy 77 are particularly concerning, as a judgment will need to be made without any proper consideration at the plan-making stage. This will create inconsistent decision-making and will not provide certainty for applicants or the local community. Bourne Leisure requests that draft Policy 77 is removed from the Plan or is reworded to address the concerns. They also advise policy also references “cumulative impacts within views”. Existing development needs to be taken as the baseline for the built environment and provides the context for assessing new/additional development. Applications for extensions should not lead to the Council re-assessing the harm of existing developments, as this is the wrong starting point and may inadvertently rule out needed and sustainable development.
- Barratt Homes and Vistry object to policy wording, which fails to recognise that changes to views may not always result in a negative or adverse impact on that view.
- The effect of this policy would be to prevent the vast amount of development as Landscape Institute guidelines interpret any change as being harmful – therefore amend wording to ensure landscape has an appropriate weight in the planning balance.
- Policy should be applied flexibly, especially outside AONB’s, in recognition of the shortfall in employment land (but also housing land) in EDDC and across the sub-region

Supplementary Regulation 18 consultation Spring 2024	
• This policy was not consulted on at this time	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: • No concerns were raised.	Officer commentary in response: • No response/actions identified as needed.
Commentary on policy redrafting for the Publication Plan	
Redrafted policy title: • Policy OL 04 – Areas of Strategic Visual Importance	
It is considered that, as written, the policy is sufficiently comprehensive and robust that decision makers could apply it on a case-by-case basis and identify relevant views and features that are specifically relevant to a proposal. The policy has been amended to specifically refer to Neighbourhood Plans as some have identified key views and these should be recognised in decision making.	

Strategic Policy 78 – Green Wedges	
Green wedges are a long-standing local landscape designation that recognises the importance of maintaining open green networks between settlements in close proximity, in order to prevent settlement coalescence and maintain a sense of place and identity for local communities. New buildings within the Green Wedge will be restricted to ensure that the openness, role and function of these landscapes are not adversely affected. Green wedges are identified on the policies map.	
Issues and options consultation	

See General Issues above.	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> The policy for protection of green wedges was well supported, however numerous respondents expressed concern that existing green wedges are being eroded and coalescence is already taking place/will take place as a result of proposed allocations. <p>More detailed comments include:</p> <ul style="list-style-type: none"> Existing Green Wedges have been ignored while considering proposed development sites. It is contradictory to allocate housing in existing green wedges, especially where appeals have been won on the basis of the protective designation. The proposed policy is weaker than the existing policy, which should be retained. Green wedges aren't necessary. Landscape harm, the loss of recreational spaces, and harm to ecology can be addressed without the need for this blanket policy approach. Each application should be assessed on its merits and within these more sensitive areas they can be informed as necessary by landscape and visual appraisals and detailed ecological assessments. They can then be judged on the appropriate balance of harm and benefits. Development on a Green Wedge is likely to cause loss of agricultural land, impacting food security Development on a Green Wedge will have a detrimental 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> A methodology for the assessment of Green Wedges was produced following the Draft Plan consultation and assessments were undertaken in accordance with this methodology. Following further refinement, an updated methodology was produced which focussed on maintaining separation between settlements, and protecting the character of those settlements, rather than the wider range of purposes that featured in the Draft Plan. Members agreed that the existing Green Wedge boundaries (as per the adopted Local Plan), along with any equivalent policy areas in made Neighbourhood Plans, met the aims of the methodology and so should be retained for the Supplementary Regulation 18 consultation in Spring 2024. The Policy has been amended so that it focusses on maintaining separation between settlements and protecting the character of those settlements in order to maintain a sense of place and identity for local communities. Whilst other purposes, including those previously covered by the policy and those suggested in responses, may be desirable, they are considered to be secondary to the fundamental aims of the green wedge and there is no strategy for their delivery, and therefore have been deleted from the policy.

<p>effect on the wildlife and biodiversity of the area. Within GW's there should be at least 10 % net gain for biodiversity from pre development baseline, using the metrics set out in the Environment Bill (2021)"</p> <ul style="list-style-type: none">• Sports provision in Green Wedges are likely to require lighting which will affect the flight paths of bats.• The Policy should be fully adhered to there should not be any exceptions.• Concern was expressed that some existing green wedges are not effective (as development is being allowed in them)• Links between settlements, eg tree-lined cycle/footpaths are essential/are acceptable within GW's• If Green Wedge land is lost then compensatory provision should be made on adjacent land.• Important policy for the creation of place, identity, landscape, habitat, active travel and recreation opportunity.• Smaller green wedges even within major housing developments, are crucial in providing access to open space and in their ability to protect existing habitats (hedgerows, trees) and to allow net gain on site• Should have same status as Green Belt.• Existing green wedges are not large enough to create a meaningful gap that separates settlements and should be much larger where possible.• Green Wedges should provide wildlife corridors between and into settlements. Woodlands should have a 50m buffer from new developments and a target of 30% canopy cover in new developments. Existing trees, hedges and other	
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bio-diverse habitats should be enhanced in new developments in order to allow for this permeability between sites.

- Development within green wedges should only be allowed in exceptional circumstances and then it should be minimal and not detract from the landscape.
- Neighbourhood Plans received a lot of community support for Green Wedges and these areas (eg Sidmouth-Sidbury, West Hill to Ottery St Mary and Beer to Seaton) warrant protection in the local plan. Urban sprawl should not be permitted in these areas.
- Additional Green Wedges are required. Farringdon (and other villages affected by the new town), Clyst Honiton, Cranbrook, Exmouth, Colyton, Sidbury, Sidford, Lypstone, around Woodbury Common and Whimple were specifically suggested as locations to be considered for new or additional GW's.
- Devon Wildlife Trust advise We would like to see the addition of a further requirement: 'Development within Green Wedges must deliver a minimum 25% biodiversity net gain'.
- Broadclyst Parish Council - The Council does not agree with the statement that development in Green Wedges will be supported if it cannot be located elsewhere, and that it would not compromise, individually or cumulatively with other existing or proposed development, the integrity of the green wedge, either by diminishing its physical extent or through visual intrusion. The protection to land identified as a Green Wedge must be sacrosanct and upheld without

exception.	
Supplementary Regulation 18 consultation Spring 2024	
<p>Key issues raised in consultation:</p> <p>The responses to this question overwhelmingly oppose including new housing or employment development within Green Wedges. Most respondents view Green Wedges as important areas that should be protected from development to maintain separation between settlements, preserve local character, and protect the environment. There is strong sentiment against redrawing Green Wedge boundaries to accommodate development, as many feel this would undermine the purpose and integrity of Green Wedges. A small minority support some limited development within Green Wedges or redrawing boundaries in certain circumstances.</p> <p>The policy was well supported although some responses suggested that the terminology may need to be clarified.</p> <p>Key points raised, in order of frequency:</p> <p><i>Opposition to any development in Green Wedges</i></p> <ul style="list-style-type: none"> • Green Wedges should be protected from all development • Development would undermine the purpose of Green Wedges <p><i>Opposition to redrawing Green Wedge boundaries</i></p> <ul style="list-style-type: none"> • Redrawing boundaries would set a precedent for future 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The high level of support for the Green Wedge policy is welcomed. • It is not considered necessary to amend the Green Wedge boundaries further in light of the responses. The separation and settlement character protection that designation confers will address many of the respondents concerns about development within these areas and loss of landscape character, green space etc • Where the choice has been made to allocate sites that were in a Green Wedge as consulted on the boundary has been redrawn to exclude such sites from the defined area. • Note- a large number of responses were submitted in relation to potentially allocating sites for development within the Green Wedges. The policy implications were considered in redrafting this policy, however individual matters raised were considered on a site specific basis, rather than being addressed here. • A simplified version of the Policy wording was suggested by Officers as a result of the consultation. The second paragraph was felt to be ambiguous and difficult to understand. • The Strategic Planning Committee resolved at their meeting on 9th October 2024 that a slight variation on the policy in the adopted plan is preferable to the suggested rewording so this is the policy that will be consulted on at Regulation 19. Members felt that this policy had successfully been implemented for a number of years and did not need

<p>erosion</p> <ul style="list-style-type: none">• Changing boundaries undermines the integrity of Green Wedges <p><i>Environmental and landscape protection</i></p> <ul style="list-style-type: none">• Preserving wildlife habitats and biodiversity• Maintaining green spaces for wellbeing and climate reasons <p><i>Preserving settlement identity and character</i></p> <ul style="list-style-type: none">• Preventing coalescence of settlements• Maintaining distinct local identities <p><i>Support for excluding development from Green Wedges</i></p> <ul style="list-style-type: none">• Green Wedges should be redrawn to exclude proposed development sites <p><i>Infrastructure and service concerns</i></p> <ul style="list-style-type: none">• Inadequate roads, schools, healthcare facilities• Concerns about increased traffic and congestion <p><i>Limited support for some development in Green Wedges</i></p> <ul style="list-style-type: none">• Some respondents open to limited or carefully managed development <p><i>Calls for expanding or strengthening Green Wedges</i></p> <ul style="list-style-type: none">• Suggestions to extend existing Green Wedges• Calls for stronger protections for Green Wedges <p><i>Concerns about housing needs and affordability</i></p> <ul style="list-style-type: none">• Recognition of housing needs, but not at expense of Green Wedges• Suggestions to focus on brownfield sites or existing urban areas <p><i>Confusion or disagreement with the question</i></p> <ul style="list-style-type: none">• Some respondents found the question unclear or disagreed with its premise	<p>to be replaced.</p>
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Sustainability Appraisal	
<p>Outcome of sustainability appraisal:</p> <p>Preferred alternative: Option A. Retain Green Wedges from the adopted East Devon Local Plan 2013-31, with minor adjustments</p> <p>Reasons for alternatives being preferred or rejected:</p> <ul style="list-style-type: none"> • Option A. ‘Retain Green Wedges from the adopted East Devon Local Plan 2013-31, with minor adjustments’ is preferred as it is likely to have major positive effects on biodiversity, landscape, historic and built environment, and land resources, with a minor positive effect on health and well-being, by protecting relatively large areas of land from development. • Option B. ‘Smaller Green Wedges, compared to the adopted East Devon Local Plan 2013-31’ is rejected as the environmental benefits are less than Option A, whilst also impeding housing and employment development albeit to a lesser degree than Option A. • Option C. ‘Do not include a policy on Green Wedges’ is rejected due to negative effects on biodiversity, landscape, historic and built environment, and land resources. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • The preferred option is the alternative which is proposed in the Regulation 19 Plan
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No concerns were raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No response/actions identified as needed.

Commentary on policy redrafting for the Publication Plan

Redrafted policy title:

- Policy OL 05 – Green Wedges

The Policy focusses on maintaining separation between settlements and protecting the character of those settlements in order to maintain a sense of place and identity for local communities. Development will be permitted where it cannot be located elsewhere and will not compromise the integrity of the Green Wedge. The Strategic Planning Committee resolved at their meeting on 9th October 2024 that a slight variation on the policy in the adopted plan is preferable to the rewording that had previously been consulted on so this is the policy that will be consulted on at Regulation 19. Members felt that this adopted policy wording had successfully been implemented for a number of years and did not need to be replaced.

The Proposals Map identifies the extent of the Green Wedges based on the areas identified in the current, adopted Local Plan and the equivalent policy areas identified in made Neighbourhood Plans.

Strategic Policy 79 – Land of Local Amenity Importance or Local Green Space

This policy ensures that a number of smaller, locally important green spaces are given particular protection due to their value to local communities. Land of Local Amenity Importance is a long standing designation recognising 14 specific small parcels of land in 5 of the towns with particular visual, and other, importance and restricts development that is not for a community purpose or that would undermine the open character of the area. The sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including improved water quality, access, biodiversity, recreational, health and educational benefits.

Local Green Space is designated through local and neighbourhood plans and allows communities to identify and protect green areas of particular importance to them. It is envisaged that communities will use this designation to formally protect such areas in future, rather than identifying additional Land of Local Amenity Importance as the Local Green Space designation is recognised nationally. Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and local in character and is not an extensive tract of land. As additional Local Green Spaces may be identified during the life of the Local Plan it is not possible to identify these areas on the Policies Map, but the policy will also apply to LGS in made Neighbourhood Plans.

Issues and options consultation	
See General Issues above.	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> The policy was well supported although some responses suggested that the terminology may need to be clarified. <p>More detailed points included:</p> <ul style="list-style-type: none"> The Environment Agency comment that these spaces will be crucial in helping communities to adapt and be more resilient to climate change. Policy is ambiguous. Unclear it relates to green space “on the ground”, whether it is publicly-accessible or it relates to spaces between (and including?) buildings that are simply visible. It may duplicate Policy 77 and unclear whether it includes trees. Policy should apply environmental criteria in addition to visual ones and these spaces should include at least 10 % net gain for biodiversity from pre development baseline, using the metrics set out in the Environment Bill (2021) Don’t want local amenities, prefer a more isolated lifestyle. LGS and LLAI are needed for human and biological protection. Maps need to be improved and policy should say the areas are under review. LGS and LLAI should be listed. Housing allocations threaten some of these areas eg Mear Valley and Littleham Fields at Exmouth, contrary to this 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> It is not considered that Policy requires significant amendment in light of feedback. It is, however, proposed to include buildings for agriculture or forestry in the list of acceptable uses within LLAI/LGS to enable privately owned land to be appropriately managed LLAI are identified on the Proposals Map as longstanding designations. It is not proposed to add any additional areas during the Plan period. LGS are not mapped as it is anticipated that further designations will be made throughout the Plan period. It is not proposed to identify further LLAI and the procedure for identifying Local Green Space is set out in National Planning Guidance, so it is not for the LPA to set additional criteria or vary the process

<p>policy.</p> <ul style="list-style-type: none"> • Neighbourhood Plan policies relating to LGS and LLAI should be referred to • Devon Wildlife Trust advise We would like to see the addition of a further requirement: ‘Development within LLAI or LGS must deliver a minimum 25% biodiversity net gain’. • Broadclyst Parish Council - The Council does not agree with the statement that development in Local Green Space or Land of Local Amenity Importance areas, development will be restricted to those limited types of appropriate development set out below, unless very special circumstances can be demonstrated. Local Green Space or Land of Local Amenity Importance areas must be protected from development without exception or exemption. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • This Policy was not subject to consultation at this time 	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No concerns were raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No response/actions identified as needed.
<p>Commentary on policy redrafting for the Publication Plan</p>	

Redrafted policy title: <ul style="list-style-type: none"> Policy OL 06 - Land of Local Amenity Importance or Local Green Space
The policy relating to LLA is longstanding and widely supported. It is now proposed to expand the policy to include Local Green Space as the aims and reasons for designating are the same. It is not considered that the policy needs to be amended, beyond allowing replacement buildings for community use, adding forestry and agricultural buildings as acceptable in principle within them and deleting the reference to SPD as a means of identifying LGS.

Possible Strategic Policy 80 – Exmouth Valley Parks- DELETED

Consideration was given to including a policy (which has been a longstanding policy in previous Local Plans and the current Local Plan) to ensure that a number of small, interconnected open spaces are safeguarded so that, ultimately, an almost continuous cycle and footpath can be provided through the valleys that run alongside the brooks in Exmouth. The Valley Parks are a long standing designation recognising that the sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including, access, biodiversity, recreational, health and educational benefits as well as reducing recreational pressure on the Exe Estuary and Pebblebed heaths, however the majority of this scheme was delivered around twenty years ago and most of the remaining parcels of land are in public ownership. On balance, a policy is not considered necessary as the Valley Parks are strongly supported in the Exmouth neighbourhood plan and, in terms of preparing proposals for laying out the areas to be delivered, the community are likely to be heavily involved. It is more appropriate that the neighbourhood plan protect and deliver this scheme.

Issues and options consultation

See General Issues above.

Draft Plan Consultation

Key issues raised in consultation:

- This Policy was not subject to consultation at this time

Supplementary Regulation 18 consultation Spring 2024

Key issues raised in consultation:

- This Policy was not subject to consultation at this time

Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No concerns were raised. 	Officer commentary in response: <ul style="list-style-type: none"> No response/actions identified as needed.
Commentary on policy redrafting for the Publication Plan	
<ul style="list-style-type: none"> This policy is not included in the Publication plan. <p>There is long standing local plan policy relating to the Valley Parks. However it is proposed to leave the allocation and wording of policy of these areas to the Neighbourhood Plan.</p>	

Strategic Policy 81 – Contaminated Land	
<p>This Policy aims to ensure that despoiled, degraded, derelict, contaminated or unstable land is remediated or mitigated through the development process. The Plan supports the effective re-use of land that has been previously developed (brownfield land) but it is essential that the site is demonstrably safe and suitable for its new use, taking into account the ground conditions, natural hazards or former activities, the proposals for remediation or mitigation and impacts on the natural environment.</p>	
Issues and options consultation	
See General Issues above.	
Draft Plan Consultation	
Key issues raised in consultation: <ul style="list-style-type: none"> The Environment Agency comment that the policy could specify that the purpose of the policy is to protect the water 	Officer commentary in response: <ul style="list-style-type: none"> The Policy has been amended to refer to a proportionate assessment and monitoring (if necessary) being required.

<p>environment as well as human health.</p> <ul style="list-style-type: none">• Exmouth Town Council and several other respondents agree with policy.• How can you do this if you want to build everywhere?• Should stop plan until current plan expires in 2030.• Very happy with this chapter but will it be applied because contradicts a strategic site allocation elsewhere in plan.• Policy does not recognise contamination from agricultural activity.• A few respondents raised the need to consider decontamination of waste from low carbon technologies including batteries.• Hundreds of acres will be contaminated by solar and energy storage companies when technology becomes obsolete – bonds need to be required by EDDC to cover future costs of contamination.• Decontamination of land must be properly recorded and monitored.• A Few respondents felt that brownfield development should be prioritised.• New town is too close to landfill site and Hill Barton Business Park with its noise pollution and unpleasant odours and particulates.• There is lots of contaminated land to the west of East Devon affecting Option 1 of the new town and bad smells which would affect the new town.• Good aspirations but monitoring and enforcement are biggest issues.	<ul style="list-style-type: none">• The reasoned justification has been expanded to include reference to the water environment.• Concern regarding potential contamination from renewable technologies is noted for consideration in formulating the renewables policies.
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<ul style="list-style-type: none"> • Harm to people needs to be considered properly, not just trying to build houses everywhere. • Two proposed new town options are on landfill sites. • Denaturing contamination would add to development costs and disincentivise brownfield development. • Contamination of former Seaton gas works has not been fully investigated but nearby development has commenced. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • This Policy was not subject to consultation at this time 	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No concerns were raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No response/actions identified as needed.
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> • Policy OS 077 – Contaminated Land 	
<p>The policy is a longstanding one and is based on legislative requirements. It has been slightly amended to ensure that it is not unduly onerous and can be properly implemented.</p>	

Strategic Policy 82 – Potentially Hazardous Developments Notifiable Installations

The Plan area contains a number of ‘notifiable installations’ including high-pressure natural gas pipelines and other sites where hazardous substances are stored or used. They are subject to stringent controls under existing health and safety legislation and it is considered prudent to control the kinds of development permitted in the vicinity of notified consultation zones to ensure that development is not permitted if it would increase the risk to the health and safety of users of the site, neighbouring land or the environment.

Issues and options consultation

See General Issues above.

Draft Plan Consultation

Key issues raised in consultation:

- The Environment Agency support this policy.
- Exmouth Town Council and one other agree with policy.
- Battery energy storage systems are hazardous and need to be classified as such in the local plan.
- Support policy and should apply to pipes from waste to heat plants and high-tension power cables.
- Add to policy wording ‘or adjacent land x metres’
- Who decides what is a health and safety risk and how great it is?
- Why build when it is dangerous to health? You don’t have to build and build.

Officer commentary in response:

- The Health and Safety Executive determine the types of installation which are considered to be hazardous and set out the distances which apply. No changes are therefore proposed to the Policy.

Supplementary Regulation 18 consultation Spring 2024

Key issues raised in consultation:

- This Policy was not subject to consultation at this time

Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No concerns were raised. 	Officer commentary in response: <ul style="list-style-type: none"> No response/actions identified as needed.
Commentary on policy redrafting for the Publication Plan	
Redrafted Policy title: <ul style="list-style-type: none"> Policy OS 08 - Potentially Hazardous Developments Notifiable Installations 	
No changes are proposed to the Policy as it reflects the Health and Safety Executive guidance and it is that body which determines the types of installation which are considered to be hazardous and set out the distances which apply. The reasoned justification has been clarified to explain where the records of notifiable installations may be viewed.	

Strategic Policy 83 – Control of Pollution	
Environmental pollution has significant implications for people's health and quality of life. This Policy ensures that the possible pollution effects from proposed development are controlled and reduced in accordance with advice from the relevant statutory pollution control authority.	
Issues and options consultation	
See General Issues above.	
Draft Plan Consultation	
Key issues raised in consultation:	Officer commentary in response:

<ul style="list-style-type: none">• The Environment Agency are satisfied that this policy includes the basic elements we would want to see in a pollution control policy, particularly regarding pollution of surface or ground waters. However, the policy says that permission will not be granted to proposal that will result in 'unacceptable' levels of pollution. It is not clear how an 'unacceptable' level of pollution would be defined. The policy should be clear that new proposals will be expected to not cause pollution of air, land, or water and that any unavoidable impacts will be adequately mitigated. To address this the policy should require new development to be accompanied by a construction environment management plan (CEMP). The CEMP would need to cover SuDS and soil management during construction to avoid compaction and sediment laden run-off. Paragraph 12.29 states that 'possible pollution effects from proposed development can be a material consideration'. We recommend that this is amended to be less ambiguous so that 'can be' is replaced by 'are'. Paragraph 185 of the NPPF is clear that likely effects on pollution should be considered.• Natural England recommend that this pollution policy is strengthened to recognise the importance of environmental assets such as clean water and air to the natural environment and local communities. Policy should seek to protect habitats from water-related impacts and where appropriate seek enhancement. We would expect this policy to address the impacts of air quality on the natural environment. In particular, it should address the traffic	<ul style="list-style-type: none">• This is a longstanding, well supported policy.• Reference to 'acceptable' pollution has been deleted as that was imprecise and confusing. Instead reference is made to mitigation of pollution.• The wording has been updated to reflect the concerns of the Environment Agency. It now refers to the need for a CEMP where there is an identified risk of pollution• Reference to harm to residents and the natural environment has been deleted as it is recognised that pollution can have wider ranging impacts.
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<p>impacts associated with new development and proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation or from agricultural development which can be damaging to the natural environment.</p> <ul style="list-style-type: none">• Exmouth Town Council ask who defines acceptable levels and whether policy can be used to address issues with South West Water.• Support policy.• Several respondents queried the definition of what is 'acceptable'.• How can you do this?• Most important but developers are allowed to evade and SWW cannot refuse – EDDC need to protect residents by applying.• Need to apply to battery energy storage systems and large agricultural units.• This should be a top priority.• Should be enforced.• Too many properties are not connected to the mains sewers.• No indication of what an unacceptable level of pollution is – all pollution is unacceptable.• Need to consider, manage and minimise air pollution (traffic, solid fuel burning) noise pollution (traffic), water pollution (plastic and microplastic, sewage and farm waste) light pollution (streetlights, domestic lighting, commercial buildings).	
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<ul style="list-style-type: none">• Battery energy storage systems are ecological disasters in the making and plan should assess.• Can policy be used to address Southwest Water mismanagement?• River pollution big issue in East Devon.• Does item 1 include wood burning stoves?• Needs to be stronger to address river pollution.• Need to keep storm water separate from sewage.• Should not allow developments near watercourses.• Point 5 should refer to all insects, not just flies.• There is no acceptable level of pollution.• New town option 1 too close to Hill Barton, which already causes problems for residents.• Where will sewage/drainage be discharged?• Should not interfere and cause damage to humans and environment.• Pollution should be barrier to development, including from additional traffic and affecting water environment.• More air and sea pollution will be caused by scale of development proposed at Exmouth.• Agents for Bourne Leisure endorse the principle of draft Policy 82, but requests that 'visitors' is added to the policy wording to ensure that adequate amenity protection is provided for visitors to East Devon as well as residents and the wider environment.• Barratt Homes and Vistry feel that policy should be reworded because new development should be self-sustaining and should not be required to correct existing	
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pollution issues.	
Supplementary Regulation 18 consultation Spring 2024	
This Policy was not subject to consultation at this time	
Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> No concerns were raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> No response/actions identified as needed. However, it was advised in comment - Policy does make specific mention of wildlife sites, noting European designated sites and species. However, this is too general to be taken into account as mitigation and screened in (following People Over Wind). Policy could potentially be improved by removing reference to European wildlife sites, given text is so vague and issues covered in more detail in later policies.
Commentary on policy redrafting for the Publication Plan	
<p>Redrafted Policy title:</p> <ul style="list-style-type: none"> Policy OS 09 – Control of Pollution 	
<p>The Policy has been amended to reflect the feedback from the Environment Agency, in particular. Whilst it was considered to be acceptable in its previous format, the changes will ensure that potential sources of pollution are clearly identified, managed and appropriately mitigated.</p>	

Strategic Policy 84 – Development on High Quality Agricultural Land

<p>This Policy is intended to protect the best and most versatile agricultural land in East Devon. Some of the areas of highest quality land are in close proximity to settlements where pressures for development are amongst the greatest. Local Plan policy specifically seeks to conserve and protect the highest grades of agricultural land though this aspiration is balanced against the recognition of the need to accommodate development.</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan Consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> The Policy was well supported. There was an overriding concern that food production should be prioritised over other uses. <p>More specific points included:</p> <ul style="list-style-type: none"> Natural England advise that soils should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. This policy could be made more robust by requiring relevant development to incorporate a soil handling plan and sustainable soil management strategy based on detailed soil surveys. National Farmers Union state food security and securing the provision of an acceptable level of home produced food is critical for the nation and with future challenges and the impact of climate change this will only become more vital. Therefore support policy 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> The Policy is generally supported and meets the requirements of the NPPF. The wording of the first paragraph has been reordered so that it reads more clearly. References to agricultural and forestry use have been deleted as they are covered by the requirement for ‘an overriding need’ for the development. The requirement for a soil handling plan and sustainable soil management strategy has been added

- One respondent stated that, whilst no-one wants to see the loss of greenfields, given the need for housing the policy was as balanced as it could be.
- Conflict between areas suitable for high fruit/vegetable productivity (eg the very fertile low lying pebblebed soils) and suitability for solar farms. They should be protected for food production.
- High value cropping systems with minimal tillage should be encouraged to prevent silt entering rivers due to historic style ploughing eg Exe is being silted up
- Land management plans should be required to slow down water flow and enable capture of silt from eroding farmland. There seem to be few references to this in the plan.
- A number of respondents felt that there is no justification for loss of best and most versatile agricultural land, especially given the uncertainty of future food production.
- It is inappropriate to allocate sites in the Local Plan for development without undertaking a full assessment of the agricultural quality in terms of Grades 1, 2, 3a and possible 3b. Such an assessment will help the authority to determine if the benefits of the development justifies and clearly outweighs the loss of high quality agricultural land needed for food security.
- Grade 3b should be included as Best and Most Versatile. It is capable of greater output in times of drought and climate change than higher grades.
- No justification to develop any agricultural land apart from the provision of agricultural workers accommodation but

<p>only if unavailable on or nearby the farms.</p> <ul style="list-style-type: none">• It is right that allocated development do not need to justify the loss of high quality agricultural land. Sites have been allocated due to the strategic benefits that can be delivered and should not therefore need to justify the principle of development relative to the quality of the agricultural land to be lost. This could otherwise unduly delay and overcomplicate the delivery of these sites, if not potentially prejudice their delivery.• The policy is weak and open to exploitation. Greater clarity as to what “overriding need” means.• Food security is as important as energy security. We may not be able to import the bulk of our food into the future.• Include a section on rewilding/biodiversity net gain of 3,4 and 5 Grade land, and encourage eco-tourism. This forms part of the BNG mitigation hierarchy within the Environment Act 2020.• Development allocations, and allowing solar farms, run counter to this policy.• All existing agricultural land within the West side of East Devon, i.e. Farringdon, will be replaced by new houses• C G Fry object to blanket prohibition that has not been evidenced. This risks delivery of development that will support the strategic outcomes of the draft plan. Should be redrafted to reflect NPPF paragraph 174 b.• Barratt Homes and Vistry suggest that the requirement that development will only be permitted on the best and most versatile land where land of a lower grade is unavailable is ambiguous because it does not confirm the way in which	
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<p>the assessment should be undertaken.</p> <ul style="list-style-type: none"> • Broadclyst Parish Council - Policy 83, development on High Quality Agricultural Land is not supported. It is felt that the policy wording is too vague and that it offers too many opportunities to be overridden. • Clyst Honiton Parish Council is concerned that the development of a new town will require the development of high-quality agricultural land. They believed that the environmental impact of developing this land should be carefully considered. • The provision of homes and employment carries substantial weight in the planning balance when considered against the lack of robust housing and employment land supply in EDDC and across the subregion. This policy needs to be applied flexibly in recognition of this shortfall; this is especially the case in the western side of the District where development is clearly focused. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>This Policy was not subject to consultation at this time</p>	
<p>Sustainability Appraisal</p>	
<p>See Sustainability Appraisal table below.</p>	
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • No concerns were raised. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • No response/actions identified as needed.

Commentary on policy redrafting for the Publication Plan
Redrafted policy title: <ul style="list-style-type: none"> • Policy OS 10 – Development on High Quality Agricultural Land
The policy has been slightly redrafted to make it clearer and avoid duplication. An additional requirement has been added for development on best and most versatile agricultural land to be accompanied by a soil handling plan and sustainable soil management strategy to ensure that harm to soil is minimised, and for topsoil to be retained for reuse, in recognition of it's importance as a finite resource.

Policy omissions from Chapter 12	
It is not considered that there is a need for additional landscape policies in the Plan.	
Issues and options consultation	
See General issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • Calls for - new landscape protection areas to further defend our special place from more development. What about wider buffer zones to Woodbury common, protecting special views and nature corridors and designating green wedges • Rewilding should be encouraged through policy • Whereas many other planning authorities refer to 'blue corridors' in their local plans, there is no mention of these as such in the East Devon local plan. 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Policies in the Plan already address landscape protection, landscape features, green wedges and views. • Rewilding is not encouraged as such, however the Plan does require biodiversity net gain so development should result in an overall improvement to habitat availability and quality. • Blue corridors are not specifically protected, however there are policies in the Plan which cover a range of protections to the District's waterways and the land adjoining them- including environmental, habitat, water quality and accessibility.

<ul style="list-style-type: none"> Concern that the Valley Parks policy has been deleted 	<ul style="list-style-type: none"> The Policy protecting land for the Valley Parks in Exmouth was considered for potential reinstatement but, as it is already protected by policies in the Neighbourhood Plan, duplication in this Plan was considered to be unnecessary.
Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation: <ul style="list-style-type: none"> None specifically. 	
Sustainability Appraisal	
See Sustainability Appraisal table below.	<ul style="list-style-type: none">
Habitat Regulations Assessment	
Key issues raised in consultation: <ul style="list-style-type: none"> No concerns were raised. 	Officer commentary in response: <ul style="list-style-type: none"> No response/actions identified as needed.

Sustainability Appraisal	
Policy number/title: <ul style="list-style-type: none"> 74. Policy – Landscape features 75. Policy – Areas of Outstanding Natural Beauty 76. Policy – Coastal Preservation Areas 77. Policy – Areas of Strategic visual importance 78. Policy – Green wedges 79. Policy – Land of local amenity importance or Local Green Space 80. Policy – Exmouth Valley Parks- No policy included in the Reg 19 Plan 	

<ul style="list-style-type: none"> • 81. Policy – Contaminated land • 82. Policy – Potentially hazardous developments notifiable installations • 83. Policy – Control of pollution • 84. Policy – Development on high quality agricultural land 	
<p>Outcome of sustainability appraisal:</p> <p>Preferred alternative: Policies 74 – 83</p> <p>Reasons for alternatives being preferred or rejected:</p> <ul style="list-style-type: none"> • Policies 74 – 84 are preferred due to numerous and wide ranging benefits relating to biodiversity, landscape, the historic and built environment, land/water resources and health. • 74A. Do not include a policy to protect landscape features – this alternative would result in some uncertainty on the positive effects for objective 2, so is rejected. • 75A. Do not include a policy to protect AONBs – although AONBs are afforded protection in legislation and by the NPPF, given that two thirds of East Devon is designated as AONB, this alternative could reduce the positive effects and cause uncertainty. • 78A. Do not have green wedges – this alternative is rejected as it would result in negative effects on landscape (objective 2) as could potentially lead to settlement coalescence. It would also have less positive effects in relation to associated benefits of green wedges, such as flood management, recreation and biodiversity. • 78B. Have more extensive green wedges – this is rejected as it 	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> • Positive responses from the SA are noted.

<p>would go beyond the area of land required to avoid settlement coalescence and protect the character of settlements in close proximity to each other, and would lead to negative impacts on housing (objective 8) and employment land (objective 11) delivery.</p> <ul style="list-style-type: none">• 79A. Do not include a policy on land of local amenity importance or Local Green Space – this would cause negative uncertain effects on biodiversity (objective 1) and landscape (objective 2), due to potential for the 14 areas designated as land of local amenity important to be under pressure from development given their location in settlement boundaries; and less positive effects in relation to the policy approach in areas designated as Local Green Space. Therefore, this alternative is rejected.	
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10 Conclusions

10.1 Policy redrafting has been made in the Publication, Regulation 19, Local plan..

APPENDIX 1- Coastal Preservation Areas Methodology

East Devon Coastal Preservation Area – technical assessment review



May 2024

- Introduction

NPPF para. 180¹ requires that '*Planning policies and decisions should contribute to and enhance the natural and local environment by [inter-alia] maintaining the character of the undeveloped coast, while improving public access to it where appropriate.* Alongside other local authorities in Devon, the councils have decided to define the Undeveloped Coast through policy designation, to allow the consistent application of this NPPF principle.

In East Devon the Undeveloped Coast is designated as Coastal Preservation Area (CPA) in the Local Plan. The CPA is a policy to protect the finite resource of the undeveloped coast from development. Restrictions against development in CPAs are stronger than those for Areas of Outstanding Natural Beauty (AONBs). Areas for inclusion within the CPA should be substantially unaffected by development, and should be generally either visible from cliff top, beach, sea or estuary, or form part of the view from significant lengths of an access road, public footpath or bridleway leading to the coast or from the long-distance coastal footpath.

Generally the CPA extends inland to the visual horizon beyond which close inter-visibility with the marine environment ceases and coastal influences are largely lost. On the low-lying coastal levels, there is no abrupt cessation of views and maritime influence, but a progressive reduction inland. The inclusion of these areas within the Undeveloped Coast is principally related to the maritime influence on the vegetation, ecology and resulting character of the coastal hinterland.

The outer (coastal) extents of the CPA designation follow that of the council's jurisdiction to the Low Water Mark. Where estuaries and tidal creeks are present, a line is drawn across the mouth of these to include the waterbody extending inland within the designation. This is in recognition of the key associations and visual relationships between the estuaries and their landscapes, and the significant contribution these locally distinctive stretches of water make to the character of their associated landscapes.

Settlements are excluded from the CPA where their size and form would be a clear departure from the key "undeveloped" characteristic. Smaller development features may be included in the designation where they either positively contribute to the coastal character (e.g. historic hamlets, farmsteads and landmark buildings) or where their exclusion may perpetuate harmful forms of development in an otherwise undeveloped coastal location (eg. caravan/ holiday parks, and modern agricultural sheds).

¹ National Planning Policy Framework December 2023

As part of the new local plan making process the existing CPA boundaries have been subject to review to ensure they remain relevant. Along the East Devon coastline the exclusion of the larger settlements breaks the CPA up in to five distinct sections defined here as:

Area 1 – Lyme Regis to Seaton

Area 2 – Seaton to Sidmouth

Area 3 – Sidmouth to Budleigh Salterton

Area 4 – Budleigh Salterton to Exmouth

Area 5 – Exmouth to Topsham

Each of these areas has been reviewed. Taking the existing CPA boundaries as a starting point the review is intended as a light touch assessment of their continuing appropriateness based on a combination of desk study and field observation. CPA maps highlighting proposed changes are provided in Appendix 1. A detailed methodology is set out in Appendix 4 and is based on that used in the previous assessment.

The review is informed by published landscape character assessments comprising National Character Areas (NCAs), Landscape Character Areas (LCAs) and East Devon Landscape Character Types (LCTs). NCAs are a suite of landscape character assessments covering the whole of England and are based on broad geographical areas. LCAs are prepared at County level and may be viewed on the Devon CC environment viewer². They are place specific geographic entities made up of groupings of LCTs. A total of 68 LCAs have been described covering the entire county. LCTs are based on landform (eg Coastal cliffs; Planned inland plateau; etc.) and can occur in different locations across the District. They are described in the East Devon and Blackdown Hills Landscape Character Assessment, EDDC, 2019³. A summary of key characteristics for each of the LCTs within the CPA is provided at Appendix 2.

Review of CPA areas

AREA 1: Lyme Regis to

Seaton Overview

Area 1 extends from the County and District boundary in the east, which coincides with the urban edge of Lyme Regis, westwards across to and including the Axe valley. Apart from the Axe estuary, the seaward boundary is marked by cliffs and landslips along its full length. The A3052 forms the inland boundary which varies between 1 and 3km from the shore and generally follows an undulating ridgeline rising up to 158mAOD affording views southwards over the open coastal plateau with dramatic wind clipped trees and occasional glimpse views of the sea. At its western end the landform drops sharply to the broad Axe estuary and marshes. The settlements of Axmouth, Colyford and Seaton are excluded from the CPA. All of this CPA section falls within the East Devon AONB.

² Devon Landscape Character Areas - <https://www.devon.gov.uk/planning/planning-policies/landscape/devon-character-areas/east-devon-area/>

³ East Devon and Blackdown Hills Landscape Character Assessment, Fiona Fyfe Associates 2019

Landscape Character

The CPA within Area 1 is entirely within the Sidmouth and Lyme Bay Coastal Plateau LCA except for a small strip at the western end which falls within the Axe Valley LCA. Special qualities and key features of the LCAs relevant to Area 1 are summarised below:

Sidmouth and Lyme Bay Coastal Plateau LCA – Distinctive characteristics and special qualities

- Area between the cliff tops and Mean Low Water Mark forms part of the Dorset and East Devon Coast WHS, of outstanding world value for its geological and geomorphological formations (particularly fossils).
- Undercliffs valued for nature conservation and geological formations – Axmouth to Lyme Regis Undercliffs SSSI, SAC and NNR.
- Historic Park and Garden at Rousdon.
- High value for recreation, including part of the South West Coastal Path long distance route.
- Many cultural associations with writers and artists who have been inspired by the dramatic coastal scenery including Lionel Aggett, John Fowles and Carolyn Vernon.

Axe Valley LCA - Distinctive characteristics and special qualities

- The middle and lower reaches of the valley floor are typically broad and open.
- Meandering course of the river Axe and network of drainage ditches are features of the floodplain and maritime tidal marsh at the estuary and coast.
- Historic settlements sited at old river crossing points just above the floodplain including Seaton and Colyford.
- River Axe is SSSI and SAC.
- Estuary habitats valued for their saltmarshes and mudflats (Seaton Marshes CWS) and waders.
- Vernacular buildings of cob and thatch and village church towers that add to the picturesque qualities of the area.
- Second World War pillboxes within flood plain form a distinctive landscape feature.
- Important area for recreation including walking and horse riding – area includes the East Devon Way long distance footpath which runs through the valley.

This section of the CPA comprises a total of seven LCTs most of which are coastal as summarised in the table below. Their key features relevant to the CPA are set out in Appendix 1.

LCTs within CPA Area 1	Estimated percentage cover
Coastal LCTs	
1B Open coastal plateau	60
4H Cliffs	15
4B Marine levels and coastal plains	10
4A Estuaries	2
4D Coastal slopes and combes	3
Inland LCTs	
3A Upper farmed and settled slopes	8
3B Lower rolling farmed and settled slopes	2

The landscape within CPA Area 1 is generally representative of the LCA and LCT descriptions. Overall it is of good scenic quality with few modern detractors present and a high degree of tranquillity and remoteness away from main roads. There is a strong sense of openness and exposure across the

plateau in marked contrast to the shelter and enclosure of the combes and, at its western end, the low-lying breadth of the Axe estuary.

Consistency with CPA boundaries

Pockets of LCTs 3A and 3B that occur in CPA Area 1 to the eastern edge of the Axe Valley, are inland character types which rise from the coastal plain to the open coastal plateau. Their inclusion within the CPA boundaries is consistent with the methodology in that they are minor elements with coastal context.

The existing boundaries of the CPA are generally consistent with relevant LCAs and LCTs. In some places the Open coastal plateau LCT extends northwards beyond the current CPA boundary, but in such instances land has a northerly aspect preventing views of the sea, is sheltered somewhat by rising land to the south and coastal influences are very limited or negligible. Similarly some land within the CPA boundary to the south of the A3052 has an inland aspect. However, in such instances slopes are gentle and the overall windswept open coastal plateau character prevails. The alignment of the inland CPA boundary with the A3052 is therefore justified and provides a clear marker.

Recent development and policy changes

There are no recent developments or other physical changes within the existing CPA boundaries that adversely affect its character or would require adjustment of its current boundaries.

There are no proposed policy changes or land allocations within the emerging new Local Plan that would affect the CPA boundaries.

Area 1 Recommendation: Retain CPA boundaries to Area 1 as existing.

AREA 2: Seaton to Sidmouth

Overview

Area 2 extends from the western edge of the Axe estuary westwards to the eastern edge of Sidmouth and Sidford excluding the built-up areas of Seaton and Colyford. The built-up areas of Beer and Branscombe are also excluded. The coastline is predominantly high cliff dropping to occasional steep-sided combes. The inland extent varies between 1 to 2.2km from the coast. At its eastern and western ends the A3052 marks the inland boundary but over the middle section where the A3052 swings further inland the CPA boundary is defined by minor lanes or field boundaries. All of the Area 2 CPA section lies within the East Devon AONB apart from a strip at the eastern end between the built-up areas of Beer and Seaton extending inland as far as the A3052.

Landscape character

Area 2 lies entirely within the Sidmouth and Lyme Bay Coastal Plateau LCA except for a small area in the northwest corner, north of the hamlet of Fortescue, which lies within the East Devon Central Ridge LCA. Special qualities and key features of these LCAs relevant to this section of the CPA are summarised below:

Sidmouth and Lyme Bay Coastal Plateau LCA Distinctive characteristics and special qualities

- The landform varies from steep cliff to open exposed coastal plateau to incised steep

combe valleys which penetrate, curve and branch inland.

- Woodland and vegetation is restricted to more sheltered locations of the combe valleys and undercliff; while trees on the open plateau top comprise distinctive shelterbelts of Monterey pine and larch or occasional windblown gnarled hedgerow trees.
- Mainly arable land use on the plateau top with medium-sized regular fields defined by low hedgebanks, with small scale fields on old cliff landslips e.g. Branscombe, Beer.
- Steep combe valley sides mainly pastoral with small irregular fields.
- Semi-natural habitats that include the undercliff, where landslips have occurred and scrub and woodland vegetation has developed, chalk grasslands, saltmarsh, mudflats and old ash pollards important for lichen flora.
- Historic settlements in the combes and larger settlements on the estuaries (Beer, Sidmouth).
- Area of high tranquillity away from larger settlements and A3052 coastal road, particularly in the sheltered combes.
- Exceptional views out to sea and along the coast
- Area between the cliff tops and Mean Low Water Mark forms part of the Dorset and East Devon Coast WHS, of outstanding world value for its geological and geomorphological formations (particularly fossils).
- The chalk and limestone cliffs unique in a Devon context and the most westerly chalk cliffs in England.
- Rare chalk grassland along the coast which is designated SSSIs and CWS.
- Undercliffs valued for nature conservation and geological formations – Sidmouth to Beer Coast SSSI and SAC.
- High value for recreation, including part of the South West Coastal Path long distance route.
- Many cultural associations with writers and artists who have been inspired by the dramatic coastal scenery including Lionel Aggett, John Fowles and Carolyn Vernon.

East Devon Central Ridge LCA - Distinctive characteristics and special qualities

- Elevated narrow ridge with a rolling topography underlain by clay-with-flints or Upper Greensand.
- Steep scarp slopes that are densely wooded – ancient oak with bluebells and primroses; and some conifer plantations which extend onto the ridges.
- Low narrow earthbanks with hedges on the ridgetop, with wider historic banks in the upper farmed valleys and more species-diverse Devon hedges (e.g. beech, sycamore, ash, hazel and gorse) with flower, fern and moss-rich banks on lower slopes.
- Mainly pasture (often improved) and dairy farming with some mixed farming on heavy brown soils.
- High scenic quality
- Outstanding views across East Devon

This section of the CPA comprises a total of eight LCTs most of which are coastal as summarised in the table below. Their key features relevant to the CPA are set out in Appendix 1.

LCTs within CPA Area 2	Estimated percentage cover
Coastal LCTs	
1B Open coastal plateau	40
4A Estuaries	5
4B Marine levels and coastal plain	10

4D Coastal slopes and combes	25
4H Cliffs	9
Inland LCTs	
2A Steep wooded scarp slopes	3
3A Upper farmed and settled slopes	5
3B Lower rolling farmed and settled slopes	5
3C Sparsely settled farmed valley floors	3

The landscape within CPA Area 2 is generally representative of the LCA and LCT descriptions. This is a particularly varied stretch of coastline comprising a series of headlands and ebbs with a changing geology clearly seen in high cliffs ranging from white chalk at Beer to soft red marls at Sidmouth. The hinterland of the coastal plateau is incised by a number of north/ northwest running deep and branching coastal combes. There is a strong sense of time depth with extensive evidence of occupation by early peoples and numerous important archaeological sites. Overall it is of very high scenic quality and heritage value. Although there are several large caravan sites, most notably at Beer Head, their visual impact tends to be localised. Otherwise there are few modern detractors present. Beer and Branscombe together with the Donkey Sanctuary at Weston are popular recreation destinations. There is a high degree of tranquillity and sense of remoteness away from the main settlements and tourist hot spots, while the varied topography affords spectacular views over and along the coast.

Consistency with CPA boundaries

The existing boundaries of the CPA are consistent with relevant LCAs and LCTs. In some places the Open Coastal Plateau LCT extends northwards beyond the existing CPA boundary, but in such instances intervening landform and vegetation prevent views to the coast, coastal influences are slight and the inland boundary can be more conveniently defined by the A3052.

As developed land, Beer Quarry has been excluded from the current CPA. However, an undeveloped field parcel to the north of the quarry extending up to Paizen Lane is also excluded. As Paizen Lane runs along a ridge and forms the CPA boundary to the east and west, there is an argument for inclusion of this field within the CPA. Field visits have identified sea views from adjoining fields and glimpse views through the hedgerow bordering Paizen Lane adjacent to this parcel.

At its western end, CPA Area 2 drops steeply down from the coastal plateau to the Sid Valley through inland LCTs 2A and 3A. From the hamlet of Fortescue these afford views to High Peak and coastal promontories beyond (notably from the descent of Sidmouth footpath 117). North of Fortescue the valley slope assumes a northwesterly aspect and views of the coast are prevented by a combination of landform, vegetation and buildings and coastal character is lost. This is reflected in a change of LCA from the Sidmouth and Lyme Bay Coastal Plateau to the inland East Devon Central Ridge LCA. Despite this the CPA currently extends north from Fortiscue to the A3052, which appears to be an anomaly.

Recent development and policy changes

A parcel of land within the CPA at Short Furlong, Beer below the school site has recently been developed as a small housing scheme. Adjacent land is allocated for housing within the Beer Neighbourhood Plan and has outline consent for up to 30 dwellings. Nearby, consent has recently been granted for development of a large storage building and sound studio at the Pecorama site also within the CPA but it is less certain that this development will proceed.

There are no proposed policy changes or other land allocations within the emerging new Local Plan that are likely to affect the CPA boundaries.

Area 2 Recommendation:

- a) To amend the CPA boundaries to omit land west of Soldiers Wood between Fortescue and the A3052 as fig. 1 below.

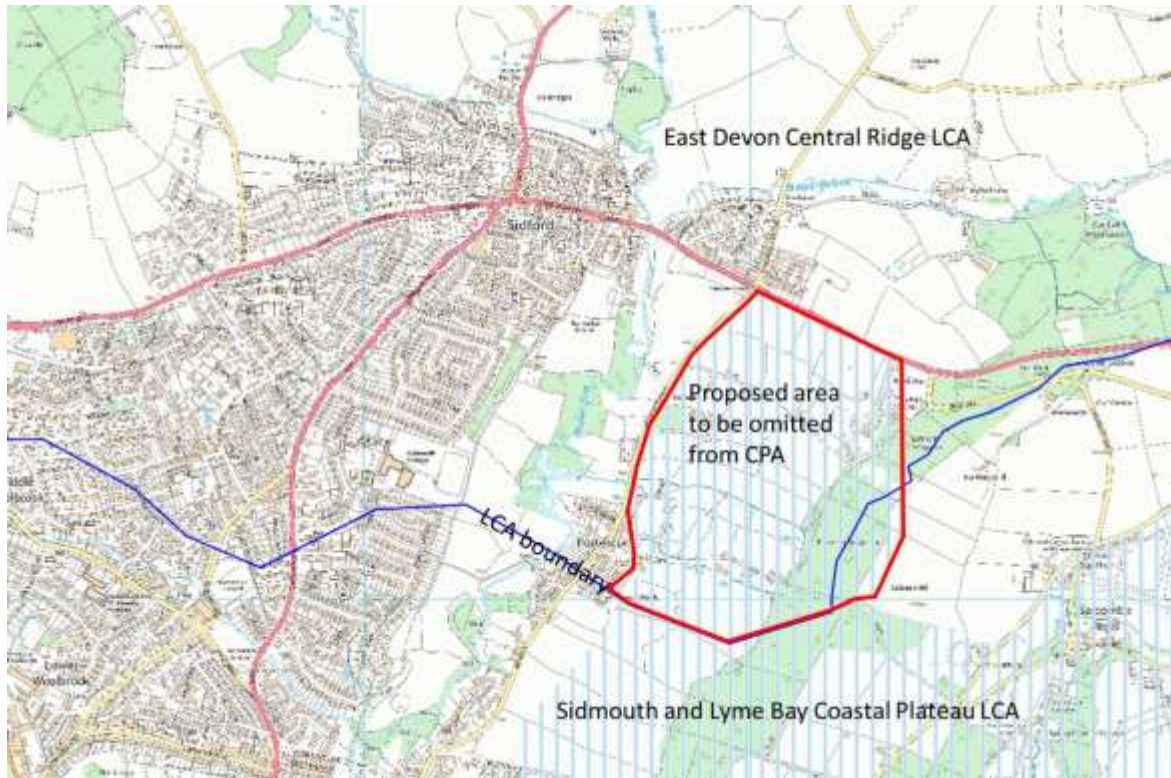


Figure 1 – Land outlined red recommended for omission from current CPA (blue hatch)

- b) To amend CPA boundaries to include land between Beer Quarry and Paizen Lane – Parcel A in fig. 2 below)
- c) To amend the CPA boundaries to exclude land allocated for housing in the Neighbourhood Plan at Short Furlong Beer (parcel B in fig. 2 below).

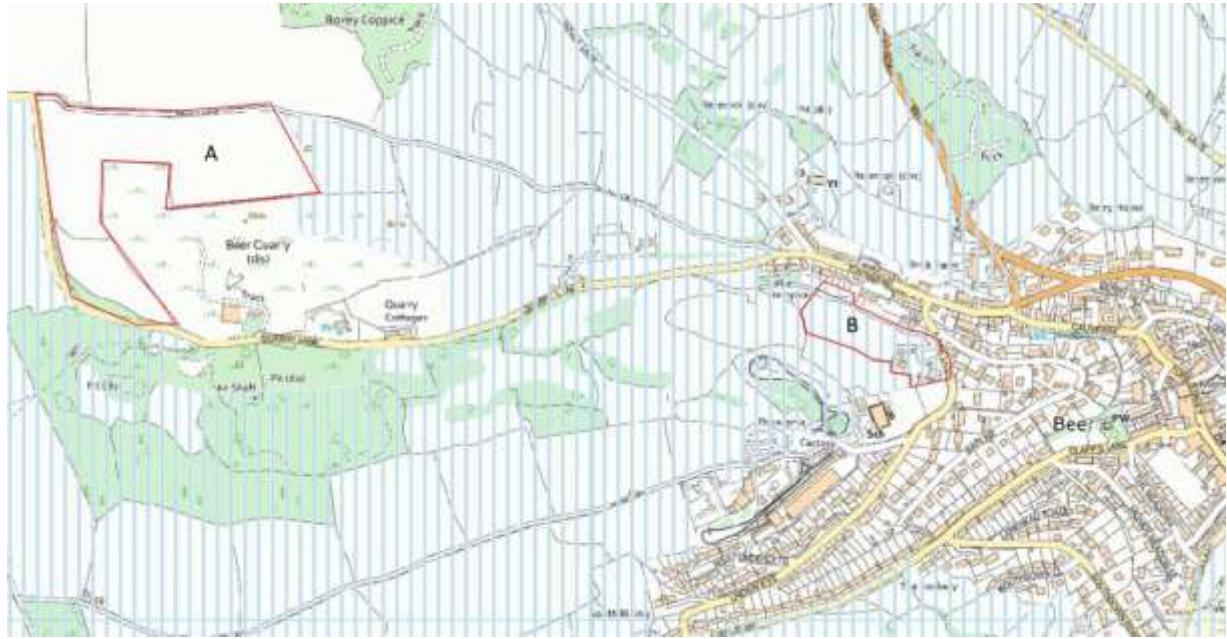


Figure 2 - Land recommended to be added to CPA (parcel A) and omitted from CPA (parcel B)

AREA 3: Sidmouth to Budleigh Salterton

Overview

Area 3 extends from the western edge of Sidmouth westwards to the eastern edge of Budleigh Salterton, the dominant landscape features being High Peak and Peak Hill. The inland extent varies between 1.5 to 2km from the shore. The inland boundaries comprise a mix of minor lanes and at the western end follow the course of the former railway between Otterton and Budleigh Salterton. All of the Area 3 CPA lies within the East Devon AONB.

Landscape character

Area 3 lies entirely within the Sidmouth and Lyme Bay Coastal Plateau LCA. Key features of the LCA relevant to this section of the CPA are summarised below:

Sidmouth and Lyme Bay Coastal Plateau LCA - Distinctive character and special qualities

- Coastal cliffs of red sandstone with pebble and sandy beaches.
- The landform varies from steep cliff to horizontal estuary and from open exposed coastal plateau to incised steep combe valleys which penetrate, curve and branch inland.
- Woodland and vegetation is restricted to more sheltered locations of the combe valleys and undercliff; while trees on the open plateau top comprise distinctive shelterbelts of Monterey pine and larch or occasional windblown gnarled hedgerow trees.
- Mainly arable land use on the plateau top with medium-sized regular fields defined by low hedgebanks.

- Semi-natural habitats that include the undercliff, where landslips have occurred and scrub and woodland vegetation has developed, saltmarsh, mudflats and old ash pollards important for lichen flora.
- Historic settlements in the combes and larger settlements on the estuaries (Budleigh Salterton and Exmouth).

- Area of high tranquillity away from larger settlements and A3052 coastal road, particularly in the sheltered combes.
- Exceptional views out to sea and along the coast.
- Area between the cliff tops and mean low water mark forms part of the Dorset and East Devon Coast WHS, of outstanding world value for its geological and geomorphological formations (particularly fossils).
- Undercliffs valued for nature conservation and geological formations – Ladram Bay to Sidmouth SSSI.
- Estuary habitats valued for their saltmarshes and mudflats (i.e. Otter Estuary SSSI and LNR and Otter Meadows CWS).
- High value for recreation, including part of the South West Coastal Path long distance route.
- Many cultural associations with writers and artists who have been inspired by the dramatic coastal scenery including Lionel Aggett, John Fowles and Carolyn Vernon.

This section of the CPA comprises a total of eight LCTs most of which are coastal as summarised in the table below. Their key features relevant to the CPA are set out in Appendix 1.

LCTs within CPA Area 3	Estimated percentage cover
Coastal LCTs	
1B Open coastal plateau	20
4A Estuaries	5
4B Marine levels and coastal plains	10
4D Coastal slopes and combes	15
4H Cliffs	5
5D* Estate wooded farmland	25
Inland LCTs	
2A Steep wooded scarp slopes	5
3A Upper farmed and wooded slopes	5
3B Lower rolling farmed and settled slopes	10

*Although LCT 5D is also found in inland areas it is considered coastal in this context as it essentially comprises the designed Bicton estate landscape on the Otterton peninsula overlaid on what would otherwise be considered open coastal plateau.

The landscape within CPA Area 3 is generally representative of the LCA and LCT descriptions. It is a landscape of very high scenic quality. The coastline is marked by striking red sandstone cliffs and includes the highest points on the East Devon coastline (High Peak 157m and Peak Hill 159m AOD) and the prominent land mass of Mutter's Moor behind. Although the large holiday park of Ladram Bay lies within the CPA its visual impact is localised. Otherwise, there is very little modern development evident within the CPA boundaries. There are very extensive views afforded along the coast and to the hinterland rising to the Pebblebed Heaths.

Consistency with CPA boundaries

At the western end of Area 3, covering the Otterton peninsula and Otter estuary and tidal flats, there is a good correlation between the CPA boundaries and the published landscape character assessments. From Buddleigh Salterton to Otterton the disused railway course clearly defines the inland boundary of the CPA. Between Otterton and Sidmouth the topography becomes more complex. This is reflected in the frequency of changes of LCTs which include a number of inland types which have limited coastal influence but which, due to their elevation and aspect, afford views to the coast and sea or form a visually prominent, undeveloped horizon in views from the coast.

From Otterton eastwards the inland CPA boundary for Area 3 follows a mix of field boundaries, minor roads and green lanes and the urban edge of Sidmouth, generally following the Sidmouth and Lyme Bay Coastal Plateau LCA boundary. This takes in the north side of Bulverton Hill (northern end of Mutter’s Moor) despite its northerly aspect on a wooded slope with no coastal influence or views, but which forms part of spectacular panoramic views over undeveloped East Devon coastline from high ground to the west of Budleigh Salterton.

A few field parcels between Stantyway Farm and Otterton included in the CPA have a steep northwesterly aspect with no coastal views or influence but form part of the view to undeveloped coastline seen from the high ground of the Pebblebed heaths to the northwest and their inclusion in the CPA is justifiable for this reason.

Recent development and policy changes

There are no proposed policy changes within the emerging new Local Plan that are likely to affect the CPA boundaries but housing allocations proposed at Sidmouth to the east of the B3176 (Bawd-Sidmouth road) within the draft new local plan would require amendment of the CPA boundaries if confirmed.

Area 3 Recommendation

Retain CPA boundaries to Area 3 as existing with minor adjustment north of Otterton and southeast of Burnthouse Farm to incorporate a local ridgeline and better fit with LCT 4A Coastal slopes and combes boundary as fig. 3 below:

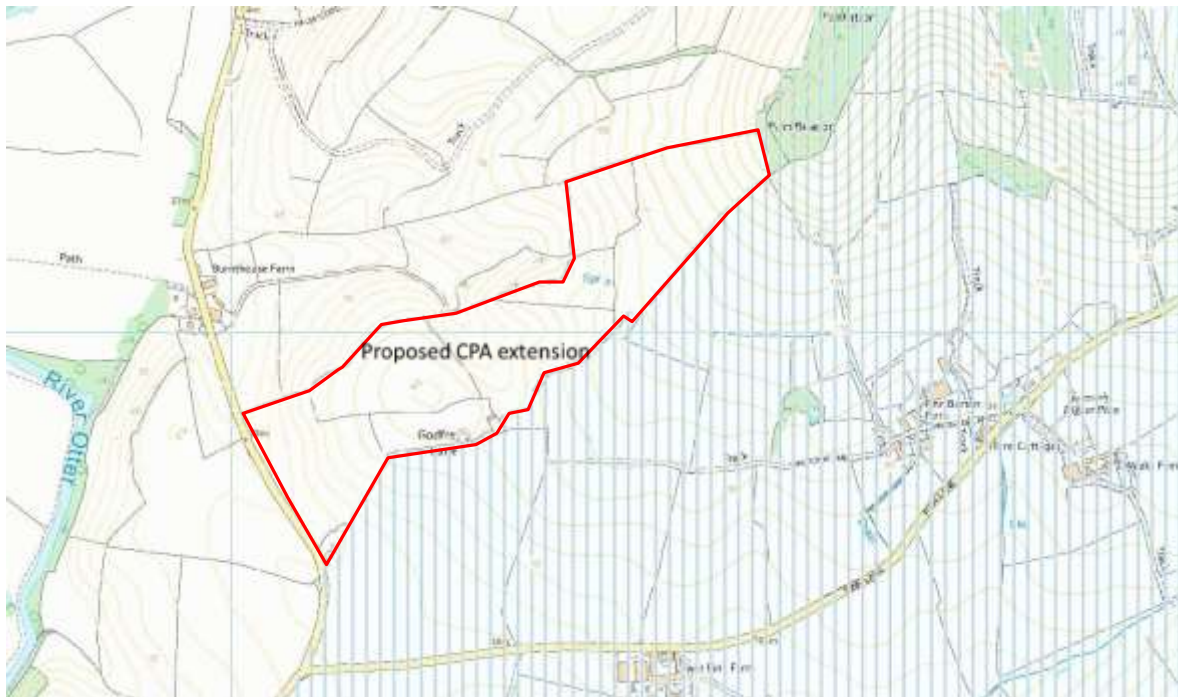


Figure 3 - Proposed amendment of CPA boundary north of Pinn Lane Otterton by addition of land outlined in red

AREA 4: Budleigh Salterton to Exmouth

Overview

Area 4 extends from the western edge of Budleigh Salterton to the eastern edge of Exmouth and is a continuation of the high cliff and open coastal plateau. The inland extent varies between 0.8 to 2km from the shore. The inland boundaries comprise a mix of minor lanes and the B3178 Salterton Road. The eastern and western ends abut the built-up boundaries of Budleigh Salterton and Exmouth respectively. All of the Area 4 CPA lies within the East Devon AONB.

Landscape character

The CPA within Area 4 is entirely within the Sidmouth and Lyme Bay Coastal Plateau LCA. Special qualities and key features of the LCA relevant to Area 4 are summarised below:

Sidmouth and Lyme Bay Coastal Plateau LCA - Distinctive characteristics and special qualities

- The landform varies from steep cliff to open exposed coastal plateau.
- Woodland and vegetation is restricted to more sheltered locations of the combe valleys and undercliff; while trees on the open plateau top comprise distinctive shelterbelts of Monterey pine and larch or occasional windblown gnarled hedgerow trees.
- Mainly arable land use on the plateau top with medium-sized regular fields defined by low hedgebanks.
- Semi-natural habitats that include the undercliff, where landslips have occurred and scrub and woodland vegetation has developed.
- Exceptional views out to sea and along the coast
- Area between the cliff tops and Mean Low Water Mark forms part of the Dorset and East Devon Coast WHS, of outstanding world value for its geological and geomorphological formations (particularly fossils).
- High value for recreation, including part of the South West Coastal Path long distance route.
- Many cultural associations with writers and artists who have been inspired by the dramatic coastal scenery including Lionel Aggett, John Fowles and Carolyn Vernon.

This section of the CPA comprises a total of two LCTs most of which are coastal as summarised in the table below. Their key features relevant to the CPA are set out in Appendix 1.

LCTs within CPA Area 4	Estimated percentage cover
Coastal LCTs	
1B Open coastal plateau	85
Inland LCTs	
1C Pebblebed Heaths	15

The landscape within Area 4 is generally representative of the relevant LCA and LCT descriptions. This is a relatively simple landscape of coastal plateau and cliff edge intersected by a prominent ridge of high ground towards its eastern end affording panoramic views in all directions. The coastline comprises hard bands of red sandstone forming the headlands of Orcombe Point and Straight Point with softer clays between which have been eroded into bays. The famous Budleigh Salterton pebble beds dip through the cliffs to the west of the town. Of the five CPA sections it is the

second most affected by development in the form of the extensive Sandy Park holiday park, adjacent MOD shooting range and Budleigh Golf Club, while the built-up edge of Exmouth is visible in views

north from sections of the South West Coast Path. Notwithstanding this, the coastal scenery is rugged affording dramatic views along the coast, out to sea and across the Exe Estuary and there is a strong sense of light, openness and exposure near the coast.

Consistency with CPA boundaries

The CPA boundaries align closely with the Sidmouth and Lyme Bay Coastal Plateau LCA boundaries except, correctly, where the Sidmouth and Lyme Bay Coastal Plateau LCA extends further inland to include most of Exmouth.

Proceeding inland from the coast, the landform rises gently to a low ridge some 1km from the shore and roughly parallel with it. North of this the landform drops to the valley of Littleham Brook and rises beyond to Salterton Road and the CPA extends across this valley. Although coastal influences are slight within the valley and there are no views to the sea, it is clearly seen in views from high ground on the Coast Path in the vicinity of West Down Beacon. There are also views down the valley to the Exe Estuary over the tops of houses in Littleham.

West of Littleham the CPA stops short of the built edge of the village by 200m despite the intervening land being visible from the coast path and affording views to the cliff tops and being included in landscape Character type 1B- Open coastal Plateau.

Recent development and policy changes

A large housing allocation within the current CPA boundaries to the east of Littleham (Exmo_07) is being considered for inclusion in the emerging new Local Plan that, if confirmed, is likely to affect the CPA boundaries.

Area 4 Recommendation:

To extend the CPA boundary up to the edge of Littleham church yard as fig. 4 below.



Figure 4 - Proposed amendment of CPA boundary by addition of land outlined in red

Area 5: Exmouth to Topsham

Overview

Area 5 extends from the northern edge of Exmouth to Topsham. In contrast to the other four sections of CPA it is entirely estuarine. The inland extent varies between 0.7 to 1.6km from the shore. The settlements of Lymptone, Exton and Ebford are excluded as is Lymptone Commando Station. The inland boundaries mostly follow field boundaries and, in some instances, minor lanes. The southern end abuts the built-up boundary of Exmouth. None of the Area 5 CPA lies within the East Devon AONB.

Landscape character

Only about half of CPA Area 5 falls within the Exe Estuary and Farmlands LCA which extends from the estuary shoreline to just beyond the A376 Exmouth Road. The remainder lies within Clyst Lowland Farmlands LCA and Pebblebed Heaths LCA. Special qualities and key features of these LCAs relevant to Area 5 are summarised below:

Exe Estuary and farmlands LCA - Distinctive qualities and key characteristics

- Extensive open, low-lying estuary opening onto south coast flanked by undulating farmland.
- Deep red, fertile underlying soils that support intensive mixed farming and are visible within ploughed fields and as red sandstone cliffs at the coast.
- Shallow valleys with small rivers and streams draining into the estuary, a landscape shaped by natural processes which changes with the tides.

- Mixed woodland and notable areas of mature parkland concentrated within designed landscapes.
- Patchwork of medium to large-scale fields delineated by hedgerows (often gappy).

- Dunes, marshes, mud and sand flats and estuarine habitats (including Eel Grass) important for waders, wildfowl and sea birds.
- Settlement pattern of nucleated villages, hamlets, farms and houses with cob, thatch, stone, render and slate and some brick; settlement denser on the eastern than the western bank.
- Network of sunken, winding lanes with often dense, high hedgebanks connecting historic settlements and contrasting with modern infrastructure such as railway.
- Enclosed and sheltered landscape with expansive views across open water and intertidal mudflats from estuary edge and adjacent slopes.
- Views to major urban areas including Exeter and Exmouth which lie adjacent.
- Recreational influences seen in small boats, boatyards, moorings, quays and as well as in nature reserves and cycling and walking routes.
- Variable sense of tranquillity: tranquil in inland valleys and parts of the estuary where there is a serene quality, but disturbed close to settlements, railway and main roads.
- Strong sense of place and scenic quality derived from the open character of the estuary with its maritime influences.
- Character and unique qualities reinforced by the contrasting wooded backdrop of elevated land at Haldon Ridge and Woodbury Common.
- Internationally important habitats valued for wildfowl including Ramsar, SPA, SSSI, NNR, LNR and CWS designations for estuary habitats and sea cliffs near Dawlish.
- Notable Historic Parks and Gardens – including Powderham Castle, Oxtou House and A La Ronde and The Point-in-View – which influence landscape character and scenic qualities and have notable collections of veteran trees.
- Extensive opportunities for water-based as well as coastal recreation (Exe Estuary Nature Reserve and East Devon Way and Exe Valley Way long distance routes).
- Distinctive views across and up and down the estuary, which can be particularly scenic under certain light conditions; this, along with abandoned vessels or hulks in the estuary, attracts artists to the area.
- Buildings and features which denote the rich commercial history of the estuary.

Pebblebed Heaths and farmland LCA - Distinctive characteristics and special qualities

- Views out to sea and also across the Exe Estuary.
- Distinctive, unspoilt, wooded skyline providing local distinctiveness and orientation.
- Outstanding views across East Devon to west and east and also south to the coast.
- Sense of isolation, tranquillity and remoteness.

Clyst Lowland Farmlands LCA - Distinctive characteristics and special qualities

- Lowland, undulating farmed landscape underlain by mudstones, siltstones and sandstones.
- Generally well treed appearance due to significant numbers of hedgerow trees although few woodlands.
- Mixture of small to medium scale fields often with curving boundaries reflecting medieval origin.
- Mixed farming including arable and some pasture along watercourses where there is seasonal flooding, as well as areas of horsiculture and hobby farming.
- Dispersed pattern of small villages (particularly along the watercourses many with 'Clyst' place names), dispersed farmsteads and town of Honiton.
- Overarching perceptions of tranquillity and quintessential English lowland farmland when away from infrastructure and communication corridors and a sense of isolation in parts.
- Views to surrounding ridges of higher land.

This section of the CPA comprises a total of three LCTs, of which only one is coastal covering just 15 % of the designated area as summarised in the table below. Their key features relevant to the CPA

are set out in Appendix 1.

LCTs within CPA Area 3	Estimated percentage cover
Coastal LCTs	
4B Estuaries	15
Inland LCTs	
3B Lower rolling farmed and settled valley slopes	35
3E Lowland Plains	50

The landscape within Area 5 is generally representative of the relevant LCA and LCT descriptions. The settlements of Lymptone, Exton and Ebford together with the urban edge of Exmouth fragment the rural character and exert an urbanising influence on adjacent land. The existing settlement pattern and well treed, rolling landform break it up visually and away from the immediate shoreline opportunities for expansive views of the estuary are limited. There are however pockets of attractive rural landscape including historic parkland at Courtlands, Nutwell Park and west of Harefield House and National Trust farmland to the south of Courtlands.

As well as the established settlements and transport infrastructure, including the railway and A376 which run through the CPA, it is subject to particularly high development pressure due to the desirability of living in the historic estuary-side settlements while the proximity of the M5 to the northern end makes it attractive for commercial development and expansion. Within the eastern portion of the CPA, away from the A376 there is a strong rural character and pervasive sense of tranquillity.

Consistency with CPA boundaries

The inland extent of the Exe Estuary and Farmlands LCA is limited to the line of the A376 reflecting the limits of obvious coastal influence. Land to the east of this included in the CPA boundary has a southwesterly aspect and affords occasional views of the estuary through field gates and over hedges although these are rarely expansive and tend to be filtered by intervening vegetation. While this area has limited coastal influence it also provides the green undeveloped setting to views from the estuary and the western shore.

The inland extent of the CPA generally follows low northwest-southeast running ridgelines except to the east of Lymptone where the boundary only extends 400m east of the A376 despite the landform continuing to rise to a ridge line 1-3km beyond and visible from the estuary and western shore.

Recent development and policy changes

Recent commercial development at Darts Business Park extends into the CPA.

Two large agricultural stores have recently been erected within the CPA at Lymptone to the east of Meeting Lane.

A small housing development has recently been constructed within the CPA to the northeastern edge of Lymptone adjacent to Meeting Lane. Further CPA land between Meeting Lane and Strawberry Hill is proposed as a housing allocation within the emerging local plan.

Area 5 Recommendations

Amend CPA boundaries at Darts Business Park as per fig. 5 below to omit recently developed land:



Figure 5 - Proposed amendment of CPA boundary by omission of land outlined red

- b) Amend CPA boundaries to omit recent housing development at Strawberry Hill Lympstone as fig. 6 below:



Figure 6 - Proposed amendment of CPA boundary to omit recent housing development west of Strawberry Hill Lympstone

- c) CPA boundaries to wash over barns recently constructed to west of Meeting Lane.
- d) Extend CPA boundary inland to the ridgeline east of Lympstone and north of Summer Lane, Exmouth as per figure 7 below:



Figure 7- Proposed amendment of CPA boundary by addition of land outlined in red

e) In addition to these amendments a number of small, isolated pockets of undeveloped land along the estuary shoreline that were not included in the CPA previously have been incorporated.

- References

Principles of defining and maintaining the character of Devon’s undeveloped coast, Devon Landscape Policy Group Advice Note 3 – Consultation draft November 2013

Seascape Assessment for the South Marine Plan Areas, Marine Management Organisation

- MCA1: Lyme Bay West
- MCA2: Lyme Bay (East)

[National Character Areas, Natural England](#)

- NCA 147 – Blackdown Hills
- NCA 148 - Devon Redlands

Devon Landscape Character Areas, Devon County Council

- Sidmouth and Lyme Bay Coastal Plateau LCA
- Exe Estuary and farmlands LCA
- Pebblebed Heaths and farmland LCA
- Clyst Lowland Farmlands LCA
- East Devon Central Ridge LCA

East Devon and Blackdown Hills Landscape Character Assessment, Fiona Fyfe Associates Ltd 2019

Jurassic Coast Partnership Plan 2020-2025 - Management Framework for the Dorset and East Devon Coast World Heritage Site

Link to land with sea views mapping data: <https://explore-marine-plans.marineservices.org.uk/>

- Appendices

Appendix 1 - Coastal Preservation Area maps showing recommended omissions and additions

Appendix 2 -Key characteristics of LCTs

within CPA Appendix 3 – Land with sea views

mapping Appendix 4 - Methodology

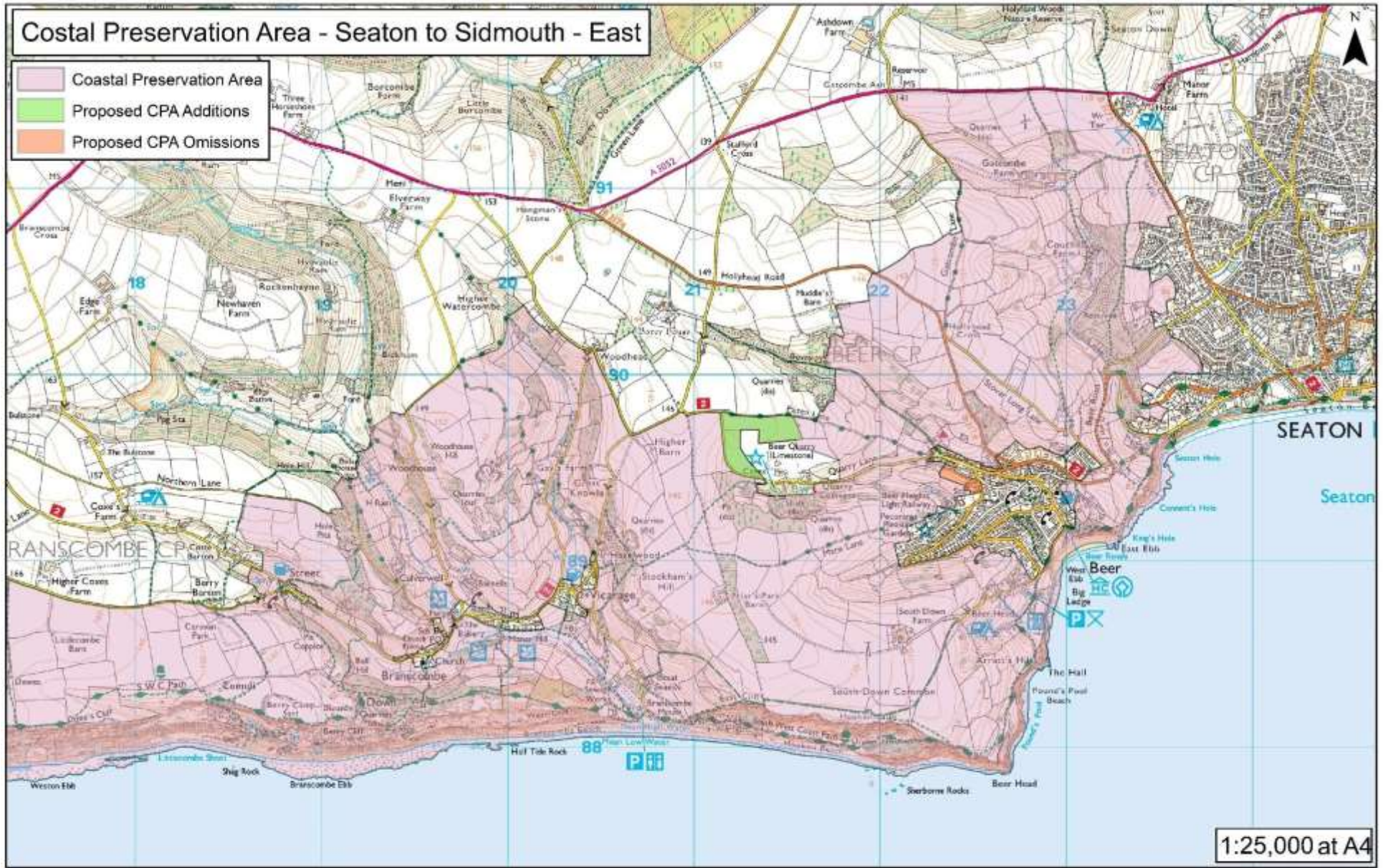


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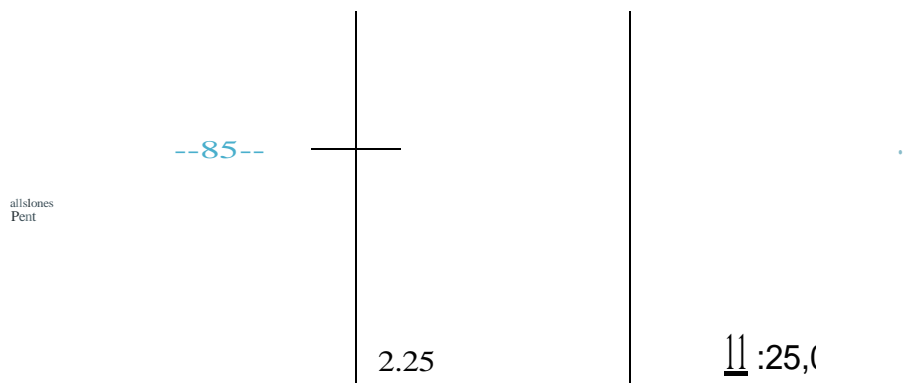


11 Coastal Preservation Area

Sidmouth to Budleigh Salterton

Coastal Preservation Area

Proposed CPA Omissions



Costal Preservation Area

Sidmouth to Budleigh Salterton - South

Coastal Preservation Area

Proposed CPA Omissions •

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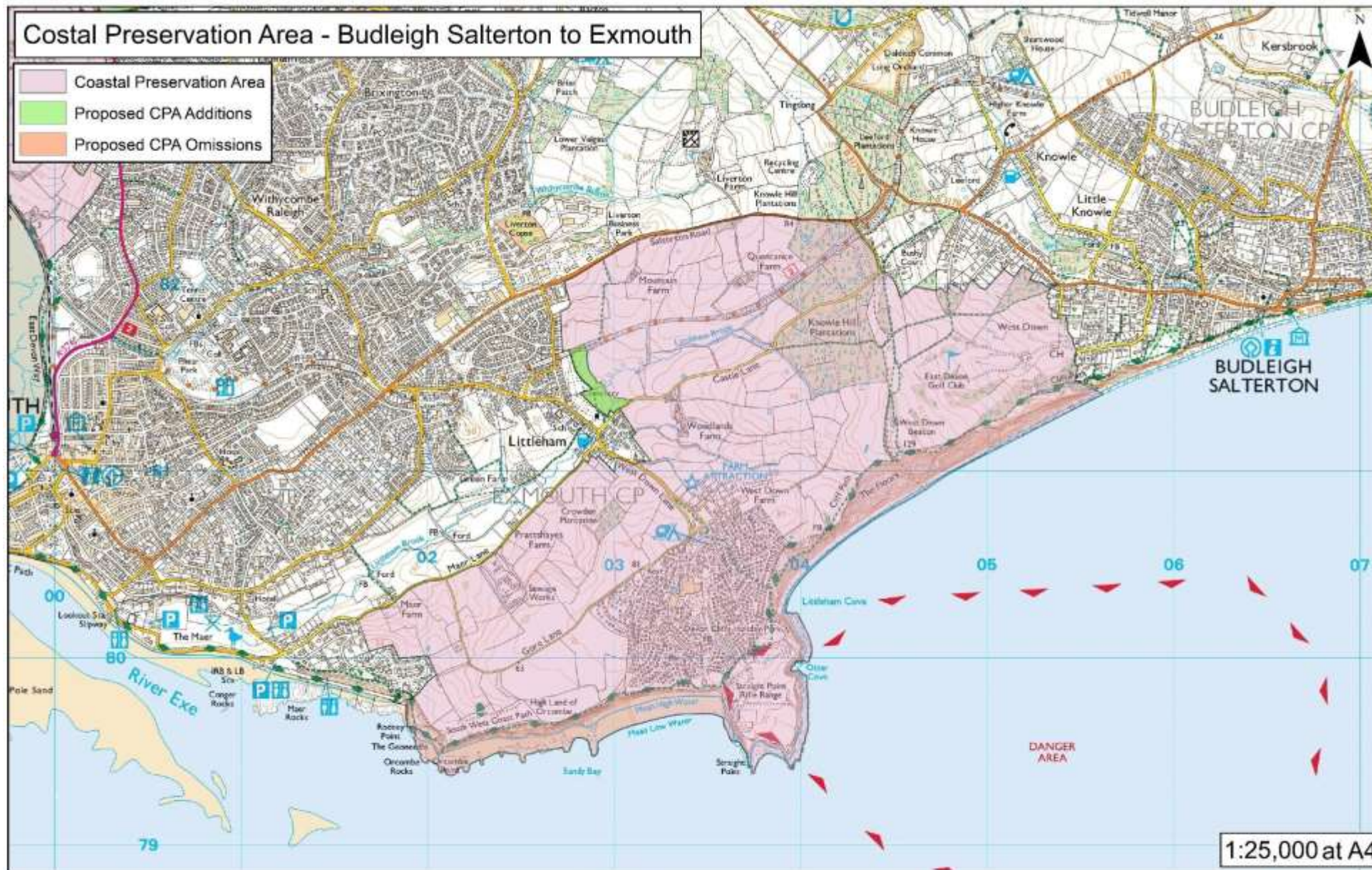
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12 Coastal Preservation Area

Ebford to Exmouth

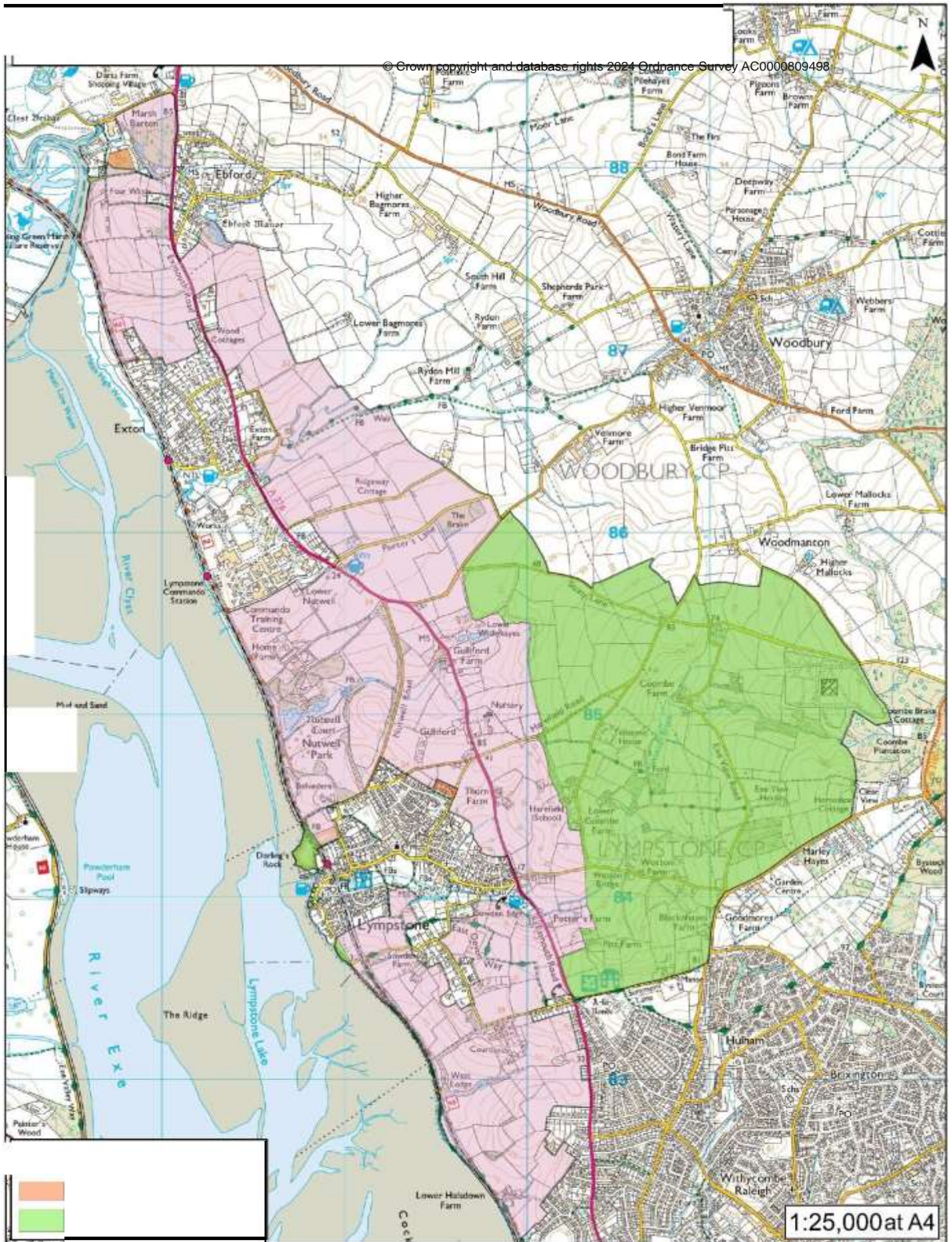
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Powderham
Sand

Coastal Preservation Area
Proposed CPA Omissions
Proposed CPA Additions

Kilometers

0 0.375 0.75 1.5 2.25 3



- Appendix 2 – Relevant key characteristics and special qualities of Landscape Character Types occurring within CPA

LCT 1B Open coastal plateau

- High, undulating, open plateaux, dissected and separated by combes and river valleys. Underlain by Permian and Triassic sandstone and mudstone in the west and limestone in the east.
- Little woodland, with occasional plantations and estate planting. Some windblown vegetation.
- A relatively large scale landscape, with a regular medium to large field pattern, dense low hedges, containing mix of species and occasional hedgerow oaks. Mixed land use, mainly arable.
- Semi-natural habitats include salt-tolerant coastal grassland, hedgerows, trees and verges, and wind-cropped thickets of blackthorn.
- Local influence of Rousdon Estate, and a postmedieval pattern of fields and farms.
- Low settlement density, mainly limited to scattered farms or hamlets. There are also several campsites and caravan parks.
- Few roads, but many rights of way, including long sections of the South West Coast Path. Main roads are straight and fast along ridges. Minor roads linking combes are narrow and often sunken.
- Extensive views along coast, often visible from South West Coast Path. Much of the LCT has a sense of openness and exposure. Context of open sky to the south and land to the north adds to the sense of place.

LCT 2A Steep wooded scarp slopes

- A narrow band of steeply sloping land immediately below the plateau edges.
- Extensive woodland, both deciduous and coniferous. Trees and hedgerows increase its wooded appearance. Notable mature oak and ash trees.
- Land use of mixed woodland and semi-improved or unimproved pasture. Small scale, irregular field pattern.
- Many patches of semi-natural habitats, including springline mires, scrub, grassland and woodland.
- Lightly settled, with occasional scattered farms, often nestled in folds of the scarp.
- Narrow winding lanes with well-treed banks. Lanes often run at an angle to the slope. Some green lanes and footpaths, but much of the LCT is inaccessible.
- Strong sense of enclosure in wooded areas, and a contrast of light and darkness. Irregular fields create varied and distinctive patterns.
- Seasonal contrasts in colour, particularly in deciduous woodlands, including spring bluebell woods and autumn leaves.
- From less wooded areas, and openings in trees, there are sudden and spectacular views over surrounding landscapes.
- Strong sense of tranquillity over much of the LCT, particularly away from roads and settlements.
- A rich diversity of woodland, grassland and springline habitats, within an historic landscape pattern.
- Its dramatic appearance as a steep ridge at the tops of the valley sites, creating a seasonally- changing backdrop to the valleys below.
- A strong sense of tranquillity, and magnificent views over surrounding valleys and across to scarps

LCT 3A Upper farmed and wooded valley slopes

- Small V-shaped valleys on upper slopes.
- Deciduous woodland and copses, especially on upper slopes. Hedgerow trees (mostly oak and ash) add to the green and lush appearance.
- Well-treed pastoral farmland, with some arable cultivation on lower slopes. Small to medium- size fields with irregular boundaries. Associated with traditional Devon smallholdings.
- Wide, species-rich hedges with many hedgerow trees. Grassland, stream and woodland habitats add to rich biodiversity.
- A dispersed settlement pattern of isolated farms and small villages. Villages are often nucleated around a church, and contain local stone (chert) and cob buildings.
- Very winding narrow lanes, many sunken with high banks and flower-rich verges.
- An intimate and intricate landscape with wider views often confined by vegetation. Where views occur, they contain distinctive patchwork patterns of fields.
- Relatively remote and tranquil with little obvious modern development.

LCT 3B Lower farmed and settled slopes

- Gently rolling landform, sloping up from valley floor.
- Oak and ash predominate, and there are small blocks of woodland.
- Predominantly pastoral farmland, often with a wooded appearance. Variable sized fields with wide, low hedged boundaries and a mostly irregular pattern, reflecting different phases of enclosure.
- Semi-natural habitats include streams and ditches, grassland, woodland and trees.
- Views tend to occur across valleys, rather from within them. Higher land in other LCTs forms the backdrop to views.

LCT 4A Estuaries

- Estuaries opening out onto south coast. Covered with shallow water at high tide, with creeks and tidal rivers highly influenced by prevailing tidal condition. Shingle spits/ beaches at the mouths of the Axe and Otter estuaries.
- River channels can be narrow and shifting, with strong tidal flows.
- Areas defined by permanently dry land to east and west. Red sandstone headlands are distinctive features.
- No tree cover within LCT, although trees on headlands (including Estate planting) add to character.
- Semi-natural habitats include extensive mudflats, with areas of sandbanks, mudflats and saltmarsh, supporting a range of wildlife.
- Unsettled, but influenced by adjacent towns.
- Small quays and jetties found along the shoreline, often associated with settlements. Adjacent railway/ tram lines and bridges.
- Few roads or public rights of way within the LCT, but South West Coast Path, cycle routes, Tramway & Exe Valley Railway line run adjacent. Exe is well-used for water-based recreation, with majority of boat traffic comprising small recreational boats.
- Mainly tranquil away from major settlements, with strong sensory characteristics. Distinctive views of Exe from trains and stations.
- An open and expansive landscape, with large skies. Church towers (particularly at Exmouth) are skyline features.

LCT 4B Marine levels and coastal plains

- Flat land and open water within a floodplain, based on alluvial or tidal deposits, and containing some reclaimed farmland in areas formerly estuary.
- Vegetation influenced by coastal conditions, with some hedges but limited tree cover.
- Largely unenclosed, with some pasture on reclaimed grazing marsh divided by ditches. Extensive informal recreational use, including nature reserves.
- Habitats of national importance include coastal grasslands, reedbeds, open water and grazing marsh.
- Non-designated archaeological sites including lime kilns, former ports (e.g. East Budleigh) and medieval saltworking sites.
- Largely unsettled, due to flooding.
- No roads within the LCT, although some run along the periphery. Recreational routes include the South West Coast Path, and Seaton Electric Tramway. Evidence of historic use for water transport.
- Parts are exceptionally tranquil, however, in some locations, the proximity of roads and settlements in adjoining areas reduces tranquillity.
- Strong sensory characteristics: colour and texture of marshes, reeds and water, smell of water, nearby saltmarsh and mudflats, sound of birdcalls, reflecting sunlight and seasonal inundation.
- Flat, expansive landscape with a feeling of space and long views, especially along valleys.

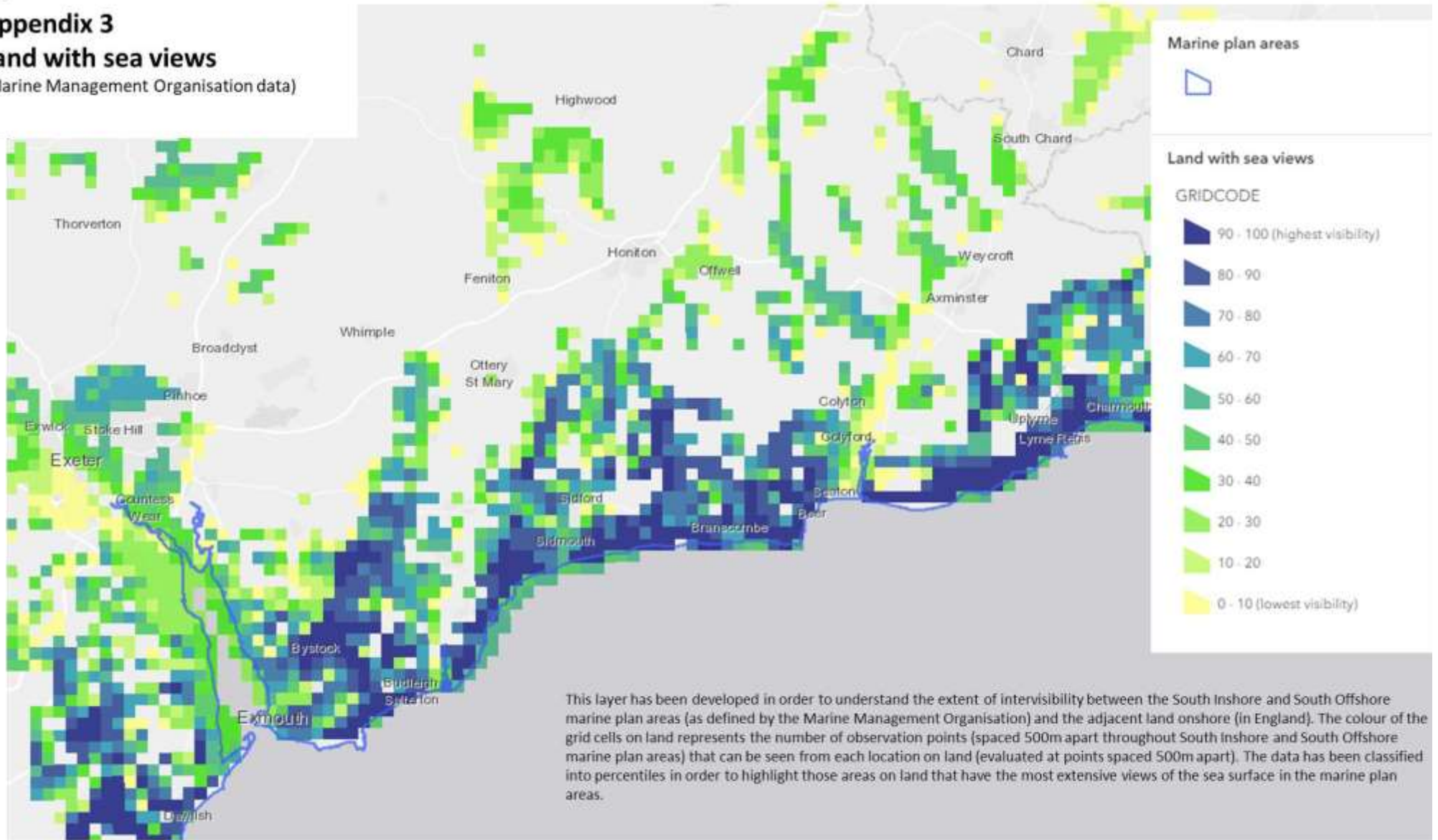
LCT 4H Cliffs

- Steeply-sloping cliffs of varying heights, nearly vertical in places; slopes shallower elsewhere due to landslips. Narrow shingle beaches at base of cliffs.
- A dynamic landscape, with distinctive landforms and rock stratifications related to limestone and sandstone geology which extends inland and out to sea.
- Predominantly treeless, although the eastern end of the study area is densely vegetated, with deciduous woodland and fern-rich groundcover.
- Unenclosed, with occasional surviving examples of undercliff 'platts' used for vegetable growing.
- Cliff faces support important breeding colonies of seabirds, and succulent plants. Local examples of extensively vegetated slumped landslips on lower half of cliff.
- Remains of prehistoric barrows on cliff tops, also industrial remains (e.g. limekilns) and military archaeology.
- Unsettled
- Accessible only along cliff top via South West Coast Path, or in some places along beach.
- Extensive and sometimes wild, with dominant marine influence and high levels of tranquillity and remoteness away from settlements.
- Strong influences of weather and season, and contrasting colours of white limestone and red sandstone.
- Extensive and dramatic views along coastline from cliff-top path, and associations with artists.

Appendix 3

Land with sea views

(Marine Management Organisation data)



- Appendix 4 – Methodology

EAST DEVON COASTAL PRESERVATION AREA REVIEW 2023

The following methodology is based on ‘An approach for defining undeveloped coast’ DLPG Advice note 3.

The original Coastal Preservation Area designation provides a starting point or baseline for defining ‘Undeveloped Coast’ through the Local Plans and Local Development Documents. This reflects the approach already adopted by many coastal planning authorities to date.

General principles

Where a need is established to amend or review boundaries, the Devon Landscape Policy Group recommends the following criteria for defining the Undeveloped Coast, developed from those used to define the Coastal Preservation Area and earlier advice in PPG20:

- a) Landscapes that have a coastal character, including direct maritime influences and coastal related activities. As a minimum the area should include the open coast down to mean low water, rias and estuaries up to the tidal limits and including the whole tidal estuary channel. Landscape character types with a distinct coastal component of their key characteristics may be useful when considering the landward extent.
- b) An area of coastal landscape perceived as undeveloped and unspoilt by modern development. This should acknowledge that most coastal landscapes in Devon have been influenced by human activity over time, and may therefore include landmark buildings, historic rural hamlets, farmsteads, farmed landscapes and country lanes for example that positively contribute to the rural ‘undeveloped’ character of the coastal landscape.
- c) The landward extent of the visual envelope visible from cliff tops, beaches, sea or estuary; or from part of the view from significant lengths of public highway, or other publicly accessible routes, leading to and along the coast, including the South West Coast Path and the intended new coastal trail / access land.

Where undeveloped coast abuts existing large villages or urban areas, there should be a presumption against allocating land for future development along the coast, given that the undeveloped coast is a finite resource.

The inland extent of the undeveloped coast will depend on its intrinsic coastal character and whether it is perceived by people to be undeveloped, rather than a definitive distance. Coastal character may extend to variable distances inland, depending particularly on the topography and natural and cultural influences such as tidal range, vegetation, coastal industries and activities.

The seaward extent of the area should integrate with the Marine Plan/Marine Character Area i.e. overlap to include to the tidal limits, to Mean Low Water and to the tidal estuary channel. Some of these areas may fall outside local authority boundaries and within the Crown Estate.

In Devon, the visual and cultural relationship between land and sea is integral to the character of the coast. Therefore the seaward area visible from the undeveloped coast should be taken into account when reviewing proposals for offshore development.

Evidence base

Landscape and seascape character assessments should be used to help define the undeveloped coast and to inform how to maintain its distinctive character through the planning process. Devon Character Areas, Landscape Character Types, and emerging seascape assessments prepared by the Marine Management Organisation (MMO) should be referred to, along with National Character Areas, as appropriate.

The Devon Historic Landscape Characterisation and Historic Environment Record should be integrated with this process and reference should be made to the Historic Seascape Characterisation being carried out by English Heritage to inform the Marine Plans.

Existing management plan and strategies should be consulted, such as those compiled for East Devon AONB, Jurassic Coast World Heritage Sites, Shoreline Management and other coast or estuaries management plans. These will help to identify the special qualities and sense of place which inform protection and enhancement, as well as natural processes and the changing character of the coast.

Since the last Local Plan some additional policy and guidance has been produced including South Inshore and South Offshore Marine Plan July 2018, Marine Character Areas MC1 Lyme Bay West and MC2 Lyme Bay East, 2013. The East Devon Landscape Character Assessment was updated in 2019. These may have some influence on the CPA boundaries and will be reviewed as part of the assessment process.

Desk study

A desk study to analyse the areas with direct maritime influences and coastal related activities will be undertaken including review of published landscape and seascape character assessments; topography; areas of floodplain and flood risk within the coastal flood zone and the extent of land visible from the shore.

- o It should be noted that the administrative area of Teignbridge District and East Devon District stop at the Mean Low Water Mark which is also the seaward limit of the Coastal Zone defined in PPG20. The permanent open water channel of the River Exe falls within Crown jurisdiction.
- o A judgement is required to set the distance from the coast or estuary shore at which visible land cannot be described as 'coastal', where direct maritime influences and coastal related activities are not significant. The extent to which these criteria affect the landscape varies considerably depending on elevation and exposure. High inland ridges many miles from the coast can be influenced by the effect of salt laden winds, and may afford distant views to the sea, however they are not considered to form part of the 'Undeveloped Coast'. For the purposes of this study the inland limit is judged to be a maximum of 4km from the coast or estuary shore. The inland limit of the 'Undeveloped Coast' therefore varies considerably, the farthest limits lying at approximately 4km.
- o An analysis of the settlement boundary (Urban Residential Development Boundary, Village Envelope and Holiday Development Area) would be undertaken and land developed since the Adopted Local Plan 2013 would be excluded from the 'Undeveloped Coast'.
- o Woodland, trees and hedgerows visible from sea or estuary should be included since these are landscape elements which form part of the 'Undeveloped Coast'. Land falling behind such features which would otherwise be visible should be included since they are not permanent and generally have no specific protection under law.
- o Buildings on the other hand are more permanent features and are rarely cleared and replaced with open land, except perhaps in cases of coastal erosion. Whilst individual and small groups of buildings and other developments may be 'washed over', larger settlements (villages and towns) are excluded.
- o Land obscured behind buildings along a settlement boundary should in theory therefore be excluded. The limits of field work, however, mean it would not be feasible to survey all land potentially obscured behind the settlement boundaries. Previous mapping of the CPA mapped to a recognisable feature e.g. a field boundary, resulting in small fields or parts of fields being included within the CPA when they were obscured by buildings.
- o Mapping to a recognisable field boundary is a pragmatic approach which is in general terms effective. In some instances, however, large fields which cross ridges and summits or vary dramatically in elevation clearly have visible and non-visible areas. In these cases the limits of the 'Undeveloped Coast' would be effectively defined by contours.

o Consideration will also be given to principle publicly accessible routes leading to and along the coast to help define the visual envelope where visibility is not defined by views from the sea or estuary. For the purposes of this study, routes leading to the coast were considered to terminate within 1km of the shore. Visibility from these routes was considered looking towards the coast or estuary. An inland limit of approximately 4km was set. Land beyond 4km from the coast or estuary was considered to have limited coastal or maritime influences. Routes along the coast were considered to be roughly parallel with and within the 4km limit.

o Where coastal land is not visible from sea or coast but potentially from significant lengths of a publicly accessible route, views may frequently be obscured by hedges, banks, trees or woodland or indeed buildings along the route. Land which is not visible from significant lengths is excluded, taking into account whether the view from the route is obscured by vegetation, banks or buildings along the route itself. The exceptions to this are where land is under direct maritime or coastal influence, small areas included for mapping purposes or pockets washed over within a wider area.

o Within the CPA pockets of land e.g. in deep valley bottoms, which are not visible but fall within a larger visible area should be 'washed over', rather than leave 'holes' in the CPA. Static caravan sites have also been washed over as these are considered to be relatively impermanent, are low in height and their replacement with larger permanent structures could adversely impact surrounding undeveloped coastal land.

Field study

o If field study work is to be undertaken it should be focussed on areas of land identified for potential inclusion and exclusion using information from the desk study, visual analysis and informed information gained from further consultation exercises. Consultations will be undertaken with East Devon AONB/ Jurassic Coast WHS/ Teignbridge DC, and other interested parties.

Field study observations will be recorded on a standard template (attached at end) to help provide consistency in forming judgements, combined with site photographs. Copies should be retained as evidence for justification of changes.

Presentation of findings

Proposed changes to CPA boundaries will be mapped using GIS software and summary location, description and justification for change provided in written/ tabular form.

- Coastal character checklist – Site:

Physical characteristics	Dominant coastal influence ←————→				No coastal influence
Topography aspect and orientation					
Maritime activities					
Shoreline development (including sea defences)					
Vegetation pattern					
Presence of natural processes					
Experiential characteristics	Dominant coastal influence ←————→				No coastal influence
Sense of space and light					
Sense of exposure and relative wildness					
Sense of naturalness and remoteness					
Extent of human influence (including cultural associations)					
Sights, sounds and smells associated with marine environment					
Visual characteristics	Dominant coastal influence				No coastal influence



Views of coastline/ marine edge					
Views of sea/ estuary					

Notes:

Undeveloped coast applicable: Yes No