

# Landscape Sensitivity Assessment and Outline Landscape Appraisal Castle Point Borough Council



**Client:**  
Castle Point  
Borough Council

**Date:**  
20/11/2024



# About Us

Place Services is a specialist provider of integrated Environmental Assessment, Planning, Design and Management Services. With a thorough and demonstrable understanding of environmental decision making within the public sector, Place Services has been established to specifically serve and actively embrace the new powers given to Local Authorities through the Localism Act. From our base at Essex County Council we combine our public sector knowhow with a competitive business approach and in doing so partner and support over 25 local authorities within Essex, London and the wider south eastern region.

Our combination of specialist skills and experience means that we are uniquely qualified to help organisations create and deliver innovative and practical design solutions. Place Services is a leading public sector service provider with a loyal and growing client base. We offer a multidisciplinary team, including Planners, Urban Designers, Landscape Architects, Historic Environment Advisors, Ecologists, Arboriculturists, Conservation, Public Art and Community Engagement specialists; we have a strong reputation for high quality work undertaken by highly skilled professionals.

With strong partnerships alongside a number of key specialist groups including Highways and Asset Management as well as our well-established private sector associates, Place Services insightful position with experience on both sides of the public and private sectors enables us to add significant value when improving the operation of the planning process. We are astutely aware of how the public sector can benefit from a business-like approach as an effective and efficient way of working. Through our own experience we can assist local authorities to work with change in a truly empathetic way.

## Our Values

- We add lasting value to the people and environments we work with, achieving shared priorities for better places.
- Enablement is a key value – we see ourselves as an extension of our client’s team, sharing knowledge, ideas and innovative solutions to help officers, councillors and all stakeholders gain focused outcomes and maximum value for money.

## Our Philosophy

- Our approach is to engage and collaborate, sharing knowledge and understanding, whilst working collectively towards the generation of viable solutions which reconcile often competing agendas. We strive to forge joint working arrangements, trust and understanding with client officers, councillors and other key stakeholders. We believe that good communication is essential to developing valuable partnerships.
- We bring an enthusiastic, flexible and integrated team approach; using our experience, dedication and skills to effectively meet your needs and expectations. By adhering to recognised principles and standards, we aim to make a positive impact on the people and places we work with. For these reasons, we are also keen to give something extra to the communities we work in.
- We believe in helping improve our communities, which is why we commit up to four weeks of the year on community projects.

Report Information	
<b>Title of Report</b>	Castle Point Landscape Sensitivity Assessment
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<b>Survey completed by</b>	Megan Cowell & Laura Cohen
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-	20/11/2024	Megan Cowell	Almudena Quiralte	First Issue

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# Introduction

**Castle Point Borough Council commissioned Place Services in June 2024 to undertake a Landscape Sensitivity Assessment (LSA) on identified sites. This report is intended to provide context for policies and proposals within the emerging Local Plan, particularly in relation to built development.**

## Background and Purpose

Castle Point Borough Council commissioned Place Services to prepare this Landscape Sensitivity Assessment (LSA) to inform the preparation of the Castle Point Plan. The conclusions of the study will inform the selection of suitable sites for allocation in the Local Plan Review and provide a sound basis for decision making in the determination of planning applications.

This study forms part of the evidence base for the Castle Point Plan and addresses the requirements of the National Planning Policy Framework (NPPF) by ensuring that landscape impacts on the openness and opportunities to enhance the landscape are fully considered in the selection of development sites for inclusion within the Local Plan. This study was undertaken to understand in detail, the potential impact upon the landscape and how the landscape and its features inform the sensitivity to development.

The principle aims and objectives of the study are:

- To provide the Council with a clear and robust evidence document to inform decision making on the allocation of land for development and the associated Sustainability Appraisal and Strategic Environmental Assessment;
- To inform the Council of opportunities for landscape enhancement as well as built development;

It should be noted that the study considered each site individually and did not consider potential cumulative effects if some or all of the sites are brought forward for development nor did it consider potential landscape and visual effects of any associated infrastructure development which may be necessary as part of the development process. It is recommended that these potential cumulative effects on the Borough's landscape are given consideration prior to the allocation of sites for development.

This study does not address potential capacity in terms of the quantity of built development in these landscapes, as this would be dependent on a much wider range of considerations other than landscape and visual effects – such as highways impact, ecological effects, archaeological constraints and other environmental, sustainability and design factors.

## Areas for Assessment

A total of 16 sites for sensitivity assessment was provided by Castle Point Borough Council. Sites selection was based on their inclusion in the Issues & Options consultation document, and promoted to the Council through the Call for Sites 2024. A map showing the location of the identified sites is included in the next page.

# Site Assessment Locations

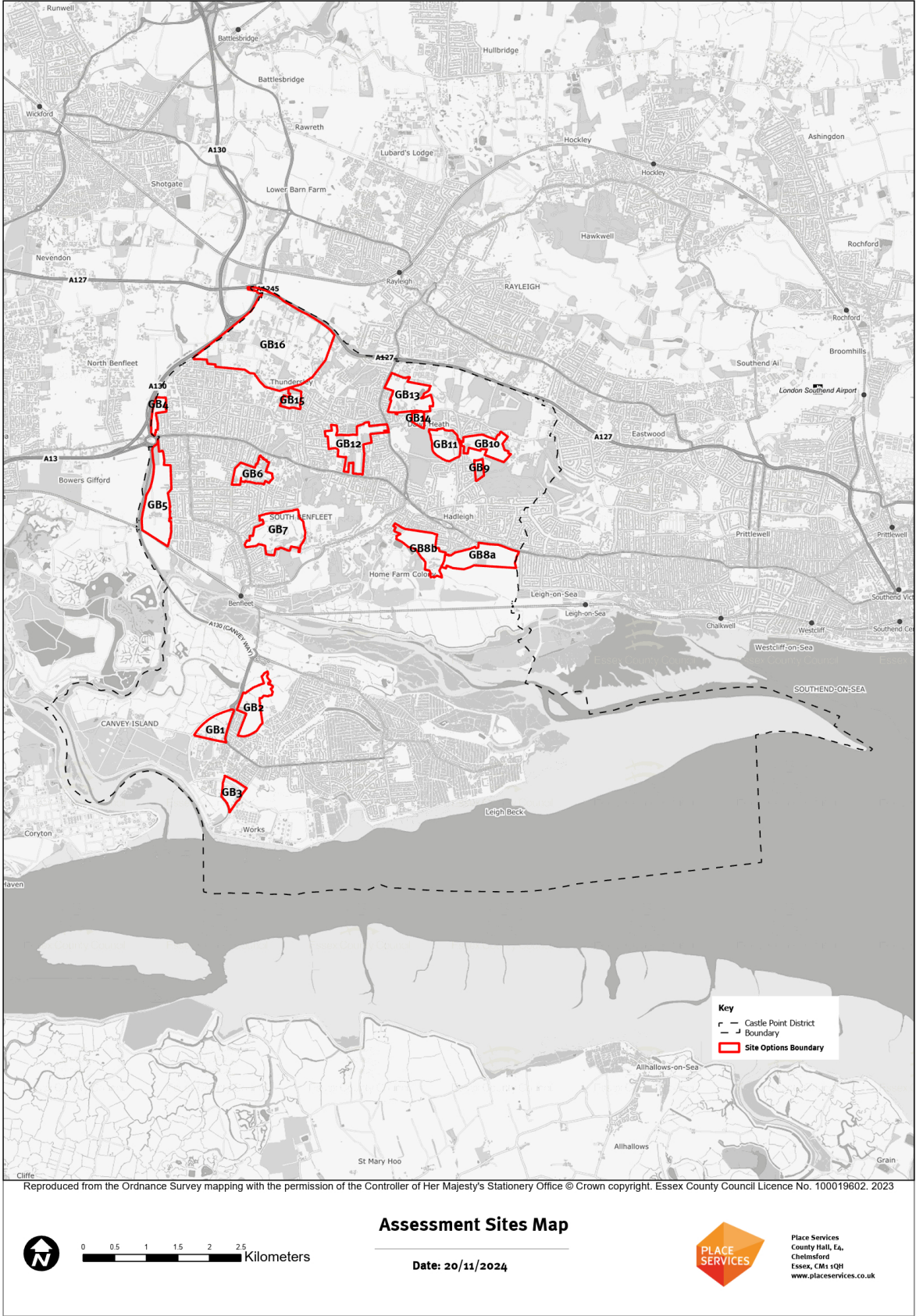


Figure 1: Map of Green Belt Sites for Assessment

# Methodology

## Landscape Sensitivity and Outline Appraisals

The assessment considers sensitivity to the ‘principle’ of built development on the sites proposed by Castle Point Borough Council, without knowing the specific size or type of potential development. Assessment is based on a combination of desktop study and detailed field survey. The principal source of written information for carrying out the sensitivity assessment is the Essex Landscape Character Assessment. This describes the variations in character between different types of landscape in the county. It also sets out strategies and guidelines for the protection, management and planning of the landscape.

The landscape sensitivity assessment and outline appraisal process was undertaken by Chartered Landscape Architects and comprised the following key stages, each of which are described in more detail below:

- Desktop assessment of plans and aerial photographs and review of previous studies;
- Site visit and assessment of site characteristics;
- Assessment of landscape sensitivity on site; and
- Recommendations on development potential of the site.

### Assessment Approach

The Landscape Sensitivity Assessment accords with best practice guidance and methodology and follows the techniques and criteria set out in ‘An approach to landscape sensitivity assessment – to inform spatial planning and land management’ (Natural England, 2019)<sup>1</sup>. The Study is also consistent with the impact assessment guidance and methodology set out within the ‘Guidelines for Landscape and Visual Impact Assessment’ (Third Edition, 2013) (GLVIA3)<sup>2</sup> and ‘An Approach to Landscape Character Assessment’<sup>3</sup>. In this study the following definition of landscape sensitivity has been used:

*“Within the context of spatial planning and land management, landscape sensitivity is a term applied to landscape character and the associated visual resource, combining judgements of their susceptibility to the specific development type / development scenario or other change being considered together with the value(s) related to that landscape and visual resource. Landscape sensitivity may be regarded as a measure of the resilience, or robustness, of a landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value.”*

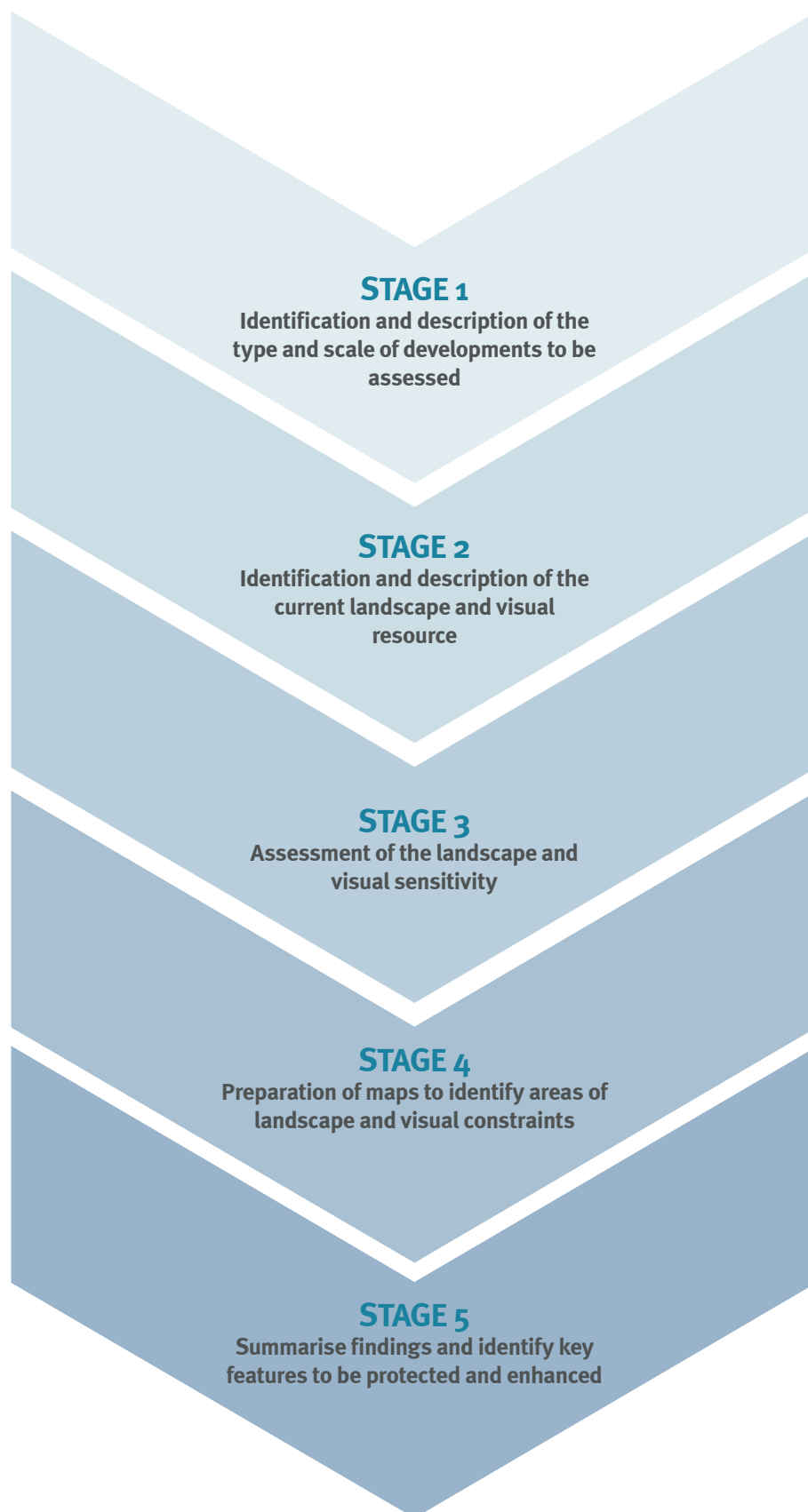
The Landscape Sensitivity Assessment is based on an assessment of landscape character, quality and value using carefully defined variables. As with all analyses this is based upon data and information that is to a greater or lesser extent subjective, therefore some caution is required in its interpretation. This is particularly necessary to avoid the suggestion that certain landscape features or qualities can be absolutely associated with certain sensitivities, whereas the reality is that landscape sensitivity is the result of a complex interaction of often unequally weighted variables. Because of the complexity of the criteria and guidance by Natural England, the assessment will be based on a five-point sensitivity scale as proposed in Table 3.

<sup>1</sup> Natural England. An approach to landscape sensitivity assessment – to inform spatial planning and land management (July 2019).

<sup>2</sup> Landscape Institute and Institute of Environmental Management & Assessment. Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013).

<sup>3</sup> Natural England. An Approach to Landscape Character Assessment (October 2014)

## Summary of the Method





## Stage 1

### Identification and description of the type of developments to be assessed

The Landscape Sensitivity Assessment considers the landscape and visual sensitivity of people within the landscape. The specific size, type or exact location (to be detailed at planning application stage) of the housing and employment development is unknown during this stage of the assessment.

## Stage 2

### Review of study areas for the assessment

Castle Point Borough Council provided a list of 16 assessment sites to be reviewed as part of the report. A description of the landscape and visual characteristics of each assessment site was made based on desktop research and published information. Each of these documents were reviewed for accuracy, scale and detail and updated if necessary. This includes:

- Ordnance Survey (OS) maps;
- Aerial photographs;
- Essex Landscape Character Assessment;
- National Character Area Profiles (NCA); and
- Planning and environmental designations and public rights of way (PROW).

The above sources allowed an initial assessment to be made of each site prior to making a site visit. This included an understanding of: landscape character context, key landscape features (e.g. topography, vegetation, transport corridors, rivers/watercourses and field patterns), land use context, public rights of way (PROW) and key planning and environmental designations.

Following desktop surveys, a field work survey was undertaken in July 2024 to further understand the landscape and visual qualities of the 16 assessment sites. Site visits comprised a visit to the site itself together with a survey by car and on foot of the surrounding area. Access was available to most sites via publicly accessible points (e.g. PROW), however where it was not possible to access the site, photos were taken from the surrounding area. The site visit was used to verify information collected from the desk-based assessment and to record additional information.

The following was recorded for each of the sites and the adjoining areas:

- Key views into the site and key views out of the site;
- Key vegetation and any other screening elements;
- Key topographic features and variations;
- Key landscape features;
- Previously-developed or 'brownfield land'.

The site visit was recorded using photographs and annotated plans.

It should be noted that it was not intended that the appraisal should comprise a detailed survey and assessment of the site. It is expected that any future development proposals for the sites (or part thereof) would be accompanied by an appropriate detailed assessment of landscape and visual context, ecological and heritage features.

The overall aims of the desktop and field studies included:

- Review the landscape character of each assessment site including the key characteristics, landscape value attributes and susceptibilities to the principle of development;
- Map all constraints and designations which are important to the assessment site;
- Review the site characteristics against the relevant Landscape Character Assessments and identify areas of similarity;
- Identify important views to and from each assessment site; and
- Identify potential landscape and visual measures that could be considered to mitigate the impact of potential future development to improve the appearance and functioning of the existing settlement edge.

The mapping utilised ESRI’s ArcGIS ModelBuilder GIS platform to collate the information.

## Stage 3

### Assessment of landscape and visual sensitivity

The study assesses the variations in landscape and visual sensitivity within the site itself, including consideration of the key criteria contributing to landscape and visual sensitivity, including topography, extent of enclosure by vegetation, complexity of the landscape, historic character, landscape character quality/condition, openness to public view, openness to private view, openness to views towards landmark buildings/natural features and existing built form.

Judgements were made through reference to the landscape and visual criteria outlined in Tables 1 and 2. The criteria is relevant to the principle of any development, inclusive of residential or employment. The physical characteristics of the landscape are outlined under Landscape Sensitivity in Table 1, and the experience of the landscape is outlined under Visual Sensitivity in Table 2. An assessment was made from high-low based on each of the 10 criterion, to highlight which features were most sensitive to each of the 16 assessment sites.

Table 1: Landscape Sensitivity Assessment Criteria

CRITERIA	MEASUREMENT OF CRITERIA	COMMENTS
Landform and landscape features	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"><li>• Smooth, gently undulating or featureless landform; the area has fewer landscape features that are characteristic or valued.</li></ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"><li>• Undulating landform and some distinct landform features within it; the area has some landscape features that are characteristic or valued.</li></ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"><li>• Dramatic landforms or distinct landform features that contribute positively to landscape character; the area has a high density of landscape features that are characteristic or valued.</li></ul>	This considers the shape and scale of the landform, landscape pattern and landscape elements in relation to the scale of potential development. It also considers the presence of landscape features if they are important to landscape character (i.e. the representation of elements which are key characteristics or valued features, with reference to the Landscape Character Assessment) because these would potentially be liable to loss.

CRITERIA	MEASUREMENT OF CRITERIA	COMMENTS
<b>Complexity</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Large, simple landscape with single/limited land uses and variety</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Medium scale landscape with variations in pattern, texture and scale</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Small and organic landscape with a variety in pattern, texture and scale</li> </ul>	The complexity and scale of the landscape includes consideration of the land use, field boundaries and levels of enclosure
<b>Enclosure by Vegetation</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Enclosed by mature vegetation</li> <li>Extensive tree belts/ woodland</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Semi-enclosed by vegetation</li> <li>Small woodlands</li> <li>Moderate hedgerows with hedgerow trees</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Limited/poor hedges (with no trees) and/or isolated copses</li> <li>Largely open with minimal vegetation</li> </ul>	Assumes hedgerows/tree belts/ woodlands would provide screening of development and therefore reduce potential landscape and visual impact.
<b>Historic Character</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Relatively few historic features important to the character of the area</li> <li>Nearly entirely of modern origin</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Some visible historic features of importance to character</li> <li>Some signs of historic origin</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>High density of historic features important to the character of the area</li> <li>Historic origin is diverse</li> </ul>	Historic Character is derived from the relative presence or absence of local historic features or designations Pre 18th century landscapes are considered to be particularly important as they pre-date the main enclosure period and therefore the landscape and field patterns are potentially medieval or earlier in origin.
<b>Built Development</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Considerable presence of built development in the surrounding landscape already that have a significant affect the character of the area.</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Some built development features within the surrounding area that have an impact on the landscape</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Absence of any built development in the landscape and surrounding area.</li> </ul>	Features include industrial or commercial buildings and infrastructure, residential dwellings, transport routes and power lines, brownfield land, and vertical structures.

**Table 2: Visual Sensitivity Assessment Criteria**

<b>CRITERIA</b>	<b>MEASUREMENT OF CRITERIA</b>	<b>COMMENTS</b>
<b>Openness to Public View</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Area is well contained from public views</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Area is partially contained from public views</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Area is very open to public views</li> </ul>	<p>Public views will include views from Roads, Rights of Way and public open space.</p> <p>The category will depend on the extent of the visibility from all the site perimeters and rights of way through site, as well as the number of likely viewers.</p>
<b>Openness to Private View</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Area is well contained from private views</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Area is partially contained from private views</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Area is very open to private views</li> </ul>	<p>This relates to private views from residential properties and non-public buildings and facilities.</p> <p>The category will depend on the extent of the visibility from the site perimeters as well as the number of likely viewers.</p>
<b>Views towards landmark buildings/ natural features</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Does not have or allow views towards any landmark buildings/ natural features</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Has or allows partial views towards landmark buildings/ natural features</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Has or allows very open views towards landmark buildings/ natural features</li> </ul>	<p>Considers views towards landmark buildings such as; listed buildings and churches.</p> <p>Natural features including; long distance views across landscapes, specimen trees and characteristic features.</p>
<b>Perceptual Quality</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>The area is significantly influenced by development/ human activity, where new development would not be out of character.</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>A landscape with some sense of rurality, but with some modern elements and human influences.</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>A tranquil or highly rural landscape, lacking strong intrusive elements. Dark skies and a high perceived degree of rurality/ naturalness with few modern human influences.</li> </ul>	<p>Considers qualities such as rurality (traditional land uses with few modern, human influences), sense of remoteness or tranquillity.</p> <p>Consistently high scenic value, perceived naturalness, freedom from human activity/disturbance and 'dark skies' would all add to sensitivity in relation to this criterion.</p>
<b>Prevention of merging/coalescence</b>	<p><u>Low Sensitivity</u></p> <ul style="list-style-type: none"> <li>Development would not compromise any separation from nearby settlements</li> </ul> <p><u>Medium Sensitivity</u></p> <ul style="list-style-type: none"> <li>Development would have moderate impact on separation</li> </ul> <p><u>High Sensitivity</u></p> <ul style="list-style-type: none"> <li>Development would significantly compromise separation and cause coalescence.</li> </ul>	<p>Considers the potential effect on merging or coalescence of settlements or parts of existing settlements if the whole Green Belt area were to be developed.</p>



## Stage 4

### Overall judgement of landscape and visual sensitivity

The individual assessments of landscape sensitivity and visual sensitivity were brought together to provide an overall judgement on the landscape and visual sensitivity for each of the 16 assessment sites. Where there was a variation between criteria, a worst-case rating was assigned.

The sensitivity level was recorded using a five-point scale (low, low-medium, medium, high-medium, high) as demonstrated in Table 3. A narrative is provided to assist with the justification behind each of the judgements. The process relies on professional judgement of the assessor to weigh the landscape and visual sensitivity to form an overall concluding judgement.

Table 3: Landscape Sensitivity

HIGH	HIGH-MEDIUM	MEDIUM	MEDIUM-LOW	LOW
Landscape and / or visual characteristics of the assessment unit are very susceptible to change and / or its values are high and it is unable to accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very low.	Landscape and /or visual characteristics of the assessment unit are susceptible to change and / or its values are medium through to high. It may be able to accommodate the relevant type of development but only in limited situations without significant character change or adverse effects if defined in the relevant land parcel summary. Thresholds for significant change are low.	Landscape and / or visual characteristics of the assessment unit are susceptible to change and / or its values are medium / low through to high / medium and / or it may have some potential to accommodate the relevant type of development in some defined situations without significant character change or adverse effects. Thresholds for significant change are intermediate.	Landscape and / or visual characteristics of the assessment unit are resilient and of low susceptibility to change and / or its values are medium / low or low and it can accommodate the relevant type of development in many situations without significant character change or adverse effects. Thresholds for significant change are high.	Landscape and / or visual characteristics of the assessment unit are robust or degraded and are not susceptible to change and / or its values are low and it can accommodate the relevant type of development without significant character change or adverse effects. Thresholds for significant change are very high.

Box 1. Landscape Sensitivity assessment limitations

Note: If the site demonstrates a complex array of constraints, intrinsic characteristics, and features that exceed the limitations of this methodology, we recommend further work, separate to this assessment, be undertaken to comprehensively evaluate the landscape sensitivities and impacts. This could involve a masterplanning exercise, though not explicitly.

Within each assessment site, there are variations in the degree of landscape and visual sensitivity across different areas. On the basis of this analysis, recommendations for key landscape areas and features that should be protected and retained and land that could potentially accommodate development was identified. These recommendations are based on judgements regarding the potential effect that development would have on visual amenity and the character, quality and features of the local landscape.

The study did not consider other issues such as accessibility, land ownership/availability, ground conditions, ecology, and local services which would need to be considered separately in other studies and may have different conclusions on the suitability of areas for development.

### **Site by Site Comparison**

Following a provisional desk-based assessment of the 16 sites using the five-point scale against each of the criteria, professional judgement was used to judge each of the sites on their own merit following an on-site assessment. The sites could then be assessed between each other once all information had been gathered, therefore allowing for a comparative assessment. The same methodology is used for all of the 16 sites, and the assessment was undertaken by the same consultants to ensure a consistent approach across all of the sites. This method allows all sites to be compared directly.

## **Stage 5**

### **Summary of assessment**

A written justification of the scoring is provided regarding the sensitivity assessment. This highlights key landscape characteristics and features of high sensitivity.

# Report Presentation

The site sensitivity results included in this report are set out in the order submitted to us by Castle Point Borough Council. The individual assessments include:

**1. Introduction**

An introduction to each of the 16 sites includes a brief overview of the location and current use. This is accompanied by an aerial image showing the site and its surrounding landscape context.

**2. Site Context**

Key features within and surrounding the site are identified through mapping, supported by photographs to provide further visual context. Characteristics relevant to the site which are outlined in the Landscape Character Area (LCA) classification (as defined by the Essex's Landscape Character Assessment) are noted, accompanied by a brief description of any key characteristics, the visual context of the site and the surrounding land uses.

**3. Site Analysis**

The assessment criteria is visually overlaid with the site context to identify constraints and opportunities for development.

**4. Assessment of Landscape and Visual Sensitivity**

This is followed by the site's sensitivity rating using a 5-point scale (see Table 3) and a short summary description of the site's landscape and visual sensitivities identified. For more detail, the results from the assessment of landscape/visual sensitivity against the ten criteria identified in the methodology (Table 1 and Table 2) have also been provided.

**5. Summary of Assessment**

A written justification of the scoring is provided regarding the sensitivity assessment, including key landscape characteristics and features of high sensitivity.

## Landscape Character Assessment

The Essex Landscape Character Assessment (2006) was undertaken by Chris Blandford Associates to assess the baseline character of the landscape within Essex. All 16 sites identified within the Castle Point LSA are located within the G3 South Essex Coastal Towns Landscape Character Area (LCA).

Each site is reviewed against the characteristics and features of the G3 South Essex Coastal Towns LCA within the assessment of landscape and visual sensitivity. A key element of the assessment includes assessing whether the site possesses characteristics of the LCA, and can therefore be described as being characteristics of the local landscape character.

Key characteristics of the G3 South Essex Coastal Towns LCA include:

- Large areas of dense urban development.
- Strongly rolling hills with steep south and west facing escarpments covered by open grassland or a mix of small woods, pastures and commons.
- Extensive flat coastal grazing marshes in the south adjacent to the Thames Estuary.
- Large blocks of woodland in the centre of the area.
- Narrow bands and broader areas of gently undulating arable farmland, with a remnant hedgerow pattern, separating some of the towns.
- Particularly complex network of major transportation routes.
- Pylon routes visually dominate farmland in the A130 corridor.

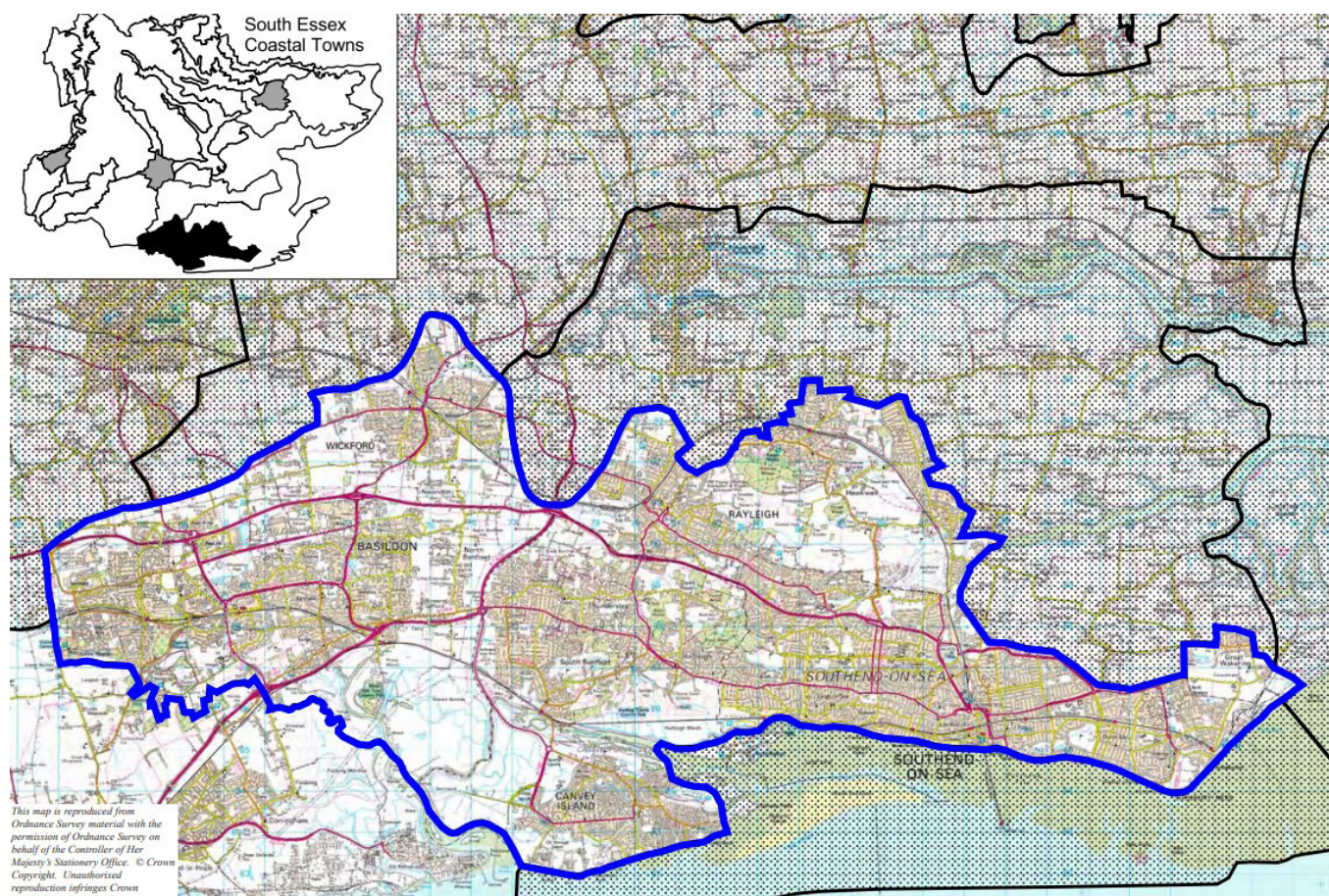


Figure 2: G3 South Essex Coastal Towns LCA



## Overall Character

The South Essex Coastal Towns is an area of very mixed character, but unified by the overall dominance of urban development, with frequent views of an urban skyline. The major towns spread over gently undulating or flat land, but locally extend over prominent ridgelines and hillsides as well. A distinctive steep sided south facing escarpment between Hadleigh and Basildon retains significant areas of open grassland, as well as a patchwork of small woods, including woods on former plotlands and small pastures. Contrasting flat coastal grazing marsh lies to the south. In some parts such as south of Hadleigh, and around Hockley, the urban form is softened by very large woodlands and the Roach Valley is largely undeveloped. However, many residential and industrial edges with areas of adjacent open arable farmland are hard and abrupt with few hedgerows and woodlands remaining.



Figure 3: View over paddocks north-west towards commercial area adjacent to A13 and A130.



Figure 4: View from Hadleigh Castle over Canvey Island and the River Thames

## Landscape Condition

- The condition of the settlement is very mixed. Poor quality intrusive commercial ‘shed’ type development is common within the area.
- The condition of the woodlands and hedgerows is moderate.

## Past, Present and Future Trends for Change

- The area has been subject to very significant change in the 20th Century, with large expansion of urban areas, and urban development pressure is likely to be a significant ongoing trend.
- Areas where traditional landscape character survives well, such as the Upper Roach Valley, the Crouch Valley, the Thames Marshes, Langdon Hills and Dunton Ridges need particular protection from landscape or development change.
- Recreational pressures are also likely to be considerable.