

Landscape and Development SPG Consultation Responses

PLEASE NOTE THAT THESE COMMENTS ARE PRESENTED IN THE ORDER THEY WERE RECEIVED BY THE AUTHORITY

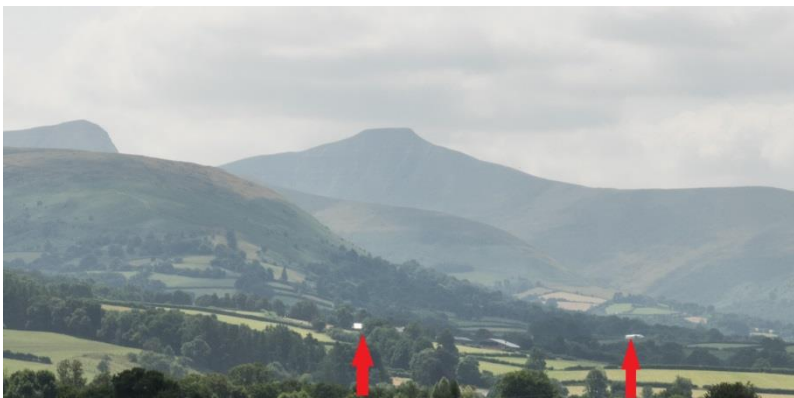
Respondent	Comment	Recommended Response	Officer Recommended Change
Mr D Hawkins	There should be greater emphasis on undergrounding power-lines especially in the Eastern Usk Valley, as currently power-lines spoil almost all views	It is felt that this matter is sufficiently covered by policy 54 of the LDP. The relevance of this policy is highlighted at Appendix I of the proposed SPG.	No change.
CPRW	Section 2.2.1 Some landscapes require 'protection/conservation' to enhance the important biodiversity they support. The proposed wording here suggests management and utilisation. CPRW would wish to see a clearer separation	In this instance the term 'resource' refers to natural capital, which includes supporting biodiversity.	No change.
CPRW	Section 2.2.3 add 'and may threaten biodiversity'	It is considered that this issue is sufficiently protected through existing policy and does not need clarification at this point.	No change
CPRW	Section 5.1.1 CPRW asks that the implications of this proposed policy are considered in relation to certain farm buildings including those constructed through permitted development rights. Some agricultural buildings, especially modern framed barns significantly negatively impact upon landscape and are built without an understanding or appreciation of landscape character and quality. CPRW asks the Authority to considers what measures based on the principles of this proposed SPG may be introduced which respects both the agricultural developments rights and the need to have regard to landscape. (images provided as examples)	There is in scope within the Agricultural Notification system for the NPA to request prior approval of agricultural development where design and siting are considered to be an issue. In such instances agricultural development would require full planning permission, and would be subject to the requirements of the policy of the LDP as supplemented by this proposed SPG	No change

CPRW

Concern is raised of the interaction of PD rights for agricultural buildings and the proposed policy. The branch is aware of some recent open-frame barn developments (these are a minority of barns in the Park). Here is an example of what is in our opinion a poorly designed barn:-



Whilst it is shielded from views from the high Beacons, it is very prominent in the landscape from the Usk valley. In addition to its location, it has a galvanised steel roof that reflects sunshine and draws the eye to it. Here are 2 more Barn examples showing how highly reflective roofing material negatively impacts on landscape



The purpose of this consultation is not to consider specific development or allocations. However in response to CPRWs concerns - design and siting are given due consideration in the balance of factors which determine whether an agricultural building is required to provide details for prior approval.

The NPA does not consider it appropriate to propose any amendments to this system.

No change

CPRW	CPRW would welcome an approach in the policy which seeks to encourage more sympathetic placing and design of barns.	Please refer to my comments above	No change
Peter Jenkins	I've been looking at Appendix 3 Landscape Character Area 6 and generally applaud the approach BBNPA is taking in trying to preserve the qualities of that area, in particular 'the attractive town of Brecon'. It is a pity that the LDP promotes the spreading of Brecon Town from the valley floor up on to higher land, and your stated overall strategy is to minimise the landscape impacts of new developments. I have drawn attention in the past to the detrimental impact on Buckingham Tower in the Town Centre which a residential development on Cae Prior Fields would have, so there appears to be a conflict there. As the Inspector said in her summing up, variations in the LDP are perfectly possible as the years progress. BBNP also wishes to protect and appropriately manage historical and archaeological sites. Slwch Twmp, which is an ancient site has not been mentioned; neither has Eluned's Well both of which have potential to encourage local communities to enjoy the landscape, the vista from the former being spectacular. It would be excellent if BBNP paid these sites some attention.	Your support is noted. Your comments regarding the specific landscape features of value are noted, however the level of detail requested is not appropriate for a the scale of landscape assessment detailed in appendix 3. As stated above, it is not for this consultation to address individual land allocations or developments, however, we would wish to assure the consultee that landscape impact forms an important consideration in the determination of planning applications within the National Park area.	No change
NRW	We welcome the inclusion of the references to relevant national local planning policies and the good use of Landmap within the Landscape Character Assessment. Furthermore, we welcome the inclusion of contributions to ecosystem services and green infrastructure as considerations within the provides for the Landscape Character Areas	Support is noted	No change

NRW	<p>The setting out of questions to consider, as in paragraph 5.1.4 and 5.2.2 provides an useful prompt for developers. However, we feel the SPG could benefit from further guidance on how cumulative impact should be considered, particularly as Policy I (appropriate Development in the National Park), section iii, asks for it to be considered:</p>	<p>The point is well made and as identified, relevant to the interpretation of policy . Propose amending the text to make reference to the need to consider cumulative landscape impacts</p>	<p>Amend 5.1.4 to include the following 'In answering these questions it is important to think about potential cumulative impacts from existing development, when taken in combination with the proposal'</p> <p>In addition add the statement 'individually or cumulatively with existing development' to the end of questions i-iii</p>
NRW	<p>We suggest that the questions in 5.2.2 of the SPG should be amended to clarify that consideration should be given to the potential effect from the development proposal alone, and its cumulative impact with other developments</p>	<p>As above</p>	<p>Section 5.2.2 amended as follows 'Applicants are reminded that when assessing their proposal for landscape impacts that due consideration should be made to the cumulative impacts derived in combination from other developments in the area: '</p>

NRW	The SPG, should also make reference to the best practice for undertaking landscape and refer to: ' <i>Guidelines for Landscape and Visual Impact Assessment</i> (Third Edition), Landscape Institute and Institute of Environmental Management and Assessment (2013)	Agreed although it is noted that the document referred to is not available to view without significant cost to the applicants.	Additional para added, 5.2.4 Where detailed landscape and visual assessment are considered necessary, applicants are advised to consult best practice guidance as provided in <i>Guidelines for Landscape and Visual Impact Assessment</i> (Third Edition), Landscape Institute and Institute of Environmental Management and Assessment (2013)
NRW	Appendix 3 – We have no comments on the Area profiles.	Noted	No change
Mr Robert Tay	Appendix 3 – LCA area 3 Forces for change in the landscape – I believe that the inference to a 'decline in traditional hill farming' to be both misleading and inaccurate. Ystradfellte Parish now has more farm owners/partners/managers under the age of forty than I've even know in the last sixty years. I am confident in the farming future in this area. However, there has been a decline in the price received for the quality livestock produced in the last two years as compared to the previous years, but price fluctuations are a regular occurrence. More worrying is the increase in day visitor numbers to area, but a decrease in the amount of money spent by each day visitor.	The reference is to the manner in which agricultural activity is undertaken, and its potential for landscape impacts, rather than an assertion that The current consultation considers development and landscape. Whereas Mr Tay's concerns are noted the content of his representation relates to matters outside of the scope of the current consultation.	No change
BBNPA Conservation Manager	2.3.1 This section has 'different from...' and 'different to...' in the same paragraph. I believe that the first couplet is the correct version.	Noted	Text at 2.3.1 amended as stated

BBNPA Conservation Manager	3.2.1 and 3.2.3 The first purpose is to ‘conserve and enhance..’ and not just to ‘conserve’ as it is given here. The objective of enhancement is also referred to in paragraphs 1.1.3, 3.3.1 (by proxy, referring to PPW 5.3.6) , and in LDP Policy 1	noted	Refer to duty to conserve and enhance under bullet point 1 at section 3.2.1
BBNPA Conservation Manager	<i>Reference to the Exterior Lighting Management Plan (for the Dark Skies Reserve)</i> Question the status of this document and the requirement to reference it. Is it best to remove the cross-reference and issue our own PAN for lighting within the Dark Skies Reserve	Since publication of the landscape draft the NPA has produced a draft Obtrusive Landscape SPG, this guidance has greater weight in the determination of planning applications, and therefore it is more appropriate to refer applicants to this guidance.	Revise section 3.5.1 to refer to state ‘The NPA has produced guidance in relation to development and lighting schemes. Please refer to our website for more information.’
BBNPA Conservation Manager	5.1.6 Needs a full stop at the end of the paragraph.	Noted	Amended as stated
BBNPA Conservation Manager	5.2.1 Would it be useful to include the definition of "natural beauty" from Annex 6 of the NPMP, in the SPG?	The definition referred to is included within the LDP. As the guidance supplements LDP policy this is considered sufficient.	No change

<p>BBNPA Conservation Manager</p>	<p>Figure 2 Would it be useful to include an additional example of a larger development, such as a housing development? As a consequence of scale and engineering requirements, these tend to be less sympathetic to the landscape. Also, I've seen housing developments on the Suffolk coast virtually identical to ones built recently in the National Park, the only differences being in the finish of the windows, red brick rather than stone or render, and the use of roof tiles rather than slates; shape and dimensions are much the same. Also, housing developments tend to ignore the local topography when they bench-in a horizontal platform to build on. Altering local topography also alters local drainage. Will this mean that they will always struggle therefore to pass the first test in Figure 3, i.e., to conserve and enhance landscape character where local topography is altered? As such, will we struggle to achieve realistic landscape sensitivity with multi-builds? Might the emphasis need to be on higher standards of environmental sustainability and resilient design of multi-builds, where these highest standards help to compensate for the landscape impact?</p>	<p>Some interesting questions are raised in this response, however it is felt that the issues raised are beyond the scope of the SPG.</p> <p>It may be of interest to note that the NPA did attempt to raise development standards with regards to environmental sustainability in response to potential landscape impacts. This proposed policy position was removed by the Inspector during examination. Her conclusion was that the NPA had insufficient evidence to support the deviation from National Policy.</p> <p>We would request that evidence gathering to support the change in policy position is given due consideration by the specialists within Countryside for future revisions of the LDP.</p>	<p>No change</p>
<p>BBNPA Conservation Manager</p>	<p>5.2.2 I recommend that local geology, soil type and drainage are added to the list of considerations here because affecting these will affect local biodiversity. For example, a development on Old Red Sandstone will lead to different ecological outcomes from the same development on Carboniferous Limestone or Twrch Sandstone. Soil depths will also differ dependent on geology, which will affect the site drainage and site preparation and engineering works required for services (water, sewage, power, IT) to and fro. There are also close links to be made between landscaping and sustainable design, particularly where the latter affects the position, scale, massing, materials and longevity of the development.</p>	<p>Noted</p>	<p>Amend 5.2.2 to include reference to local geology, soil type and drainage</p>

<p>BBNPA Conservation Manager</p>	<p>Figure 3 I recommend that boxes are added for soil conservation, sensitivity to water tables and site drainage. Soil and water management are inextricably linked to landscape management, where for example excessive land drainage can affect land subsidence, which will depend upon soil behaviour once it is drained. Altering land drainage and, or introducing new building materials, can alter local soil chemistry, which in turn may alter vegetation responses, and the success rate, of landscaping schemes.</p> <p>I recommend that this Figure includes cross references to the relevant LDP policies, and that these include 10, 11, 12 and 13 (Water Quality, Sustainable Use of Water, Light Pollution and Soil Quality).</p>	<p>Given the nature of these comments, it may be appropriate to produce separate planning guidance in relation to LDP Policy 13 and/or section 3.14 Natural Resources and/or both.</p> <p>The Policy team would welcome the opportunity to work with our colleagues in Countryside to produce such guidance.</p>	<p>No change</p>
<p>BBNPA Conservation Manager</p>	<p>Finally, whilst I acknowledge that the planning process is designed to be impartial and objective, I believe that there is a role, somewhere, by some organisation, for helping to develop ideas and visions for relevant and appropriate development in this protected landscape. For example, are there ecosystem services that new developments should provide, such as shade, water infiltration, dust suppression, screening, habitat connectivity, street scene connectivity and fuel, through the planting of new woodlands? Should new developments aim to include new food growing areas that themselves contribute to landscape, and social, harmony? Should SUDS become the norm? Could we, should we, run periodic competitions on these lines, much as RIBA does for imagined urban designs?</p>	<p>As above</p>	<p>No change</p>