



Allerdale Borough Council

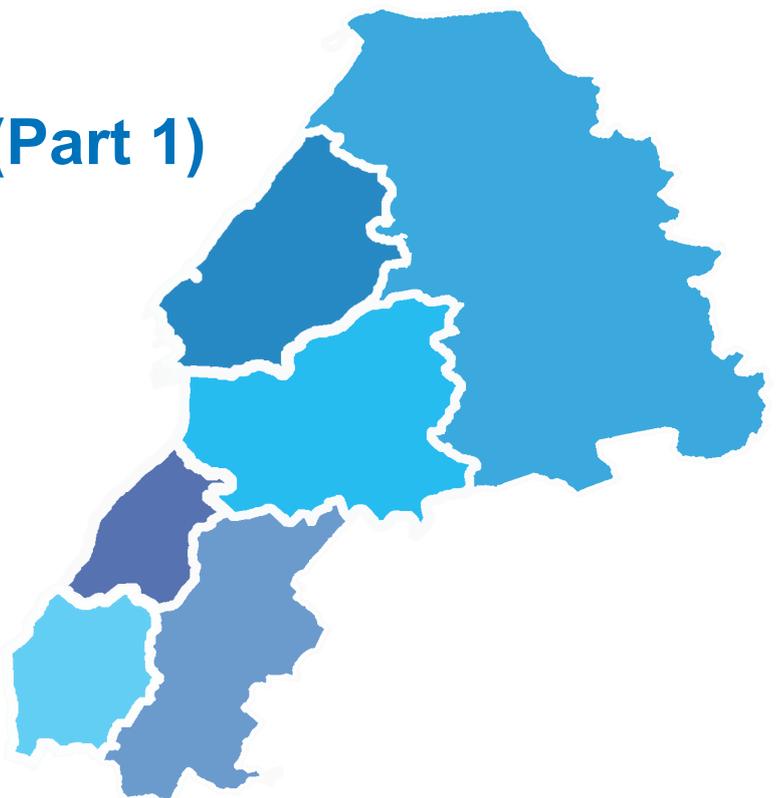


Allerdale Local Plan (Part 1)

Position Statement Main Matter 16:

The treatment of
Landscape Character
and the AONB

January 2014



Allerdale Local Plan (Part 1) Examination – Allerdale Borough Council Position Statement January 2014

Matter 16 – The Treatment of Landscape Character and the AONB

Introduction

1. This Statement has been produced by Allerdale Borough Council to outline its response to the matters raised by the Inspector for the Hearings into the Submitted Allerdale Local Plan (Part 1) Development Plan Document (DPD) **[CD1]**.
2. These Statements form the main basis for the Council's submission to the Hearings. They relate to the elements of the DPD that have been raised by the Inspector as matters to be discussed. Where appropriate the Statements draw upon and cross-refer to the main sources of information used in the preparation of the DPD such as the outcomes of public consultation, the Sustainability Appraisal, the evidence base and the supporting Topic Papers. Core Document numbers are given where appropriate.

Position of the Council regarding Matter 16

3. Policies S33 'Landscape' and S34 'Development in the Solway Coast Area of Outstanding Natural Beauty' relate directly to landscape protection, with the latter constituting a discrete policy to guide development with the Solway Coast AONB. The Council considers that these policies, including proposed modifications, are sound and have been drafted in a way that is fully compliant with the guidance set out in the National Planning Policy Framework.

Justification for approach taken

4. Paragraphs 99, 109, 113 and 156 of the National Planning Policy Framework (NPPF) emphasise the importance of landscape protection at the national level. The guidance states that local plans produced by local planning authorities should

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include policies that protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside.

5. Allerdale's landscapes, both natural and historic, constitute an important environmental and economic asset. Strategic Objective SO6a of the Local Plan seeks to transpose the requirements of the NPPF and ensure that landscape considerations are embedded throughout the decision-making framework contained within.
6. Policy S33 of the Local Plan seeks to protect conserve and where possible, enhance the landscape character and local distinctiveness of the Plan Area. The policy reflects the guidance set out in Paragraphs 99, 109, 113 and 156 of the NPPF.
7. Policy S34 provides overarching protection to the landscape, biodiversity and heritage assets within the designated area. This policy has been included to reflect the distinction between non-designated and designated site/areas as required by Paragraph 113 of the NPPF. The Council considers that this discrete policy adds an additional level of protection to the AONB, commensurate with its status reflecting Paragraphs 115 and 116 of the NPPF.

Application of dedicated landscape protection policies

8. Policy S33 seeks to protect, conserve and wherever possible enhance the landscape within the Plan Area. Under the terms of the policy applications for major development will be expected to be accompanied by an assessment of the impact on landscape character, based on the guidance set out in the Cumbria Landscape Character Assessment Toolkit **[EB16]**.

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9. Under the terms of Policy S34, development proposals within the Solway Coast AONB must not only conserve the distinctive landscape character of the area, but have the additional requirement of contributing to the aims and objectives of the AONB Management Plan [SD23]. This will ensure that new development, where permitted, will contribute to ongoing conservation and enhancement of the area.

Association with other policies within the Local Plan

10. Landscape protection is embedded throughout the policy framework of the Plan, reflecting its status as a strategic objective. Reference to landscape protection is made within the following policies:
- S2: Sustainable Development Principles
 - S3: Spatial Strategy & Growth
 - S5: Development Principles
 - S6(a-f): Area Based Policies
 - S17: Tourism, Coastal & Countryside Recreation
 - S19: Renewal Energy & Low Carbon Technologies
 - S24: Green Infrastructure
 - S28 Hadrians Wall World Heritage Site
 - S31: Reuse of Rural Buildings & Replacement Dwellings in the Countryside
 - S32: Safeguarding Amenity
 - S37: Shoreline Management & Coastal Development
11. These policies signpost out to the more detailed criteria set out in Policy S33 and Policy S34 and therefore, are to be read in conjunction when assessing development proposals. This emphasises the fact that the Local Plan should be read as a whole and reflects the Councils preferred approach to have two ‘core’

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landscape policies rather than the duplication of landscape protection criteria within policies throughout.

Addressing issues raised within the representations

12. Representations received in relation to the Pre-Submission draft of Policy S33 raise two issues. Firstly, that greater clarity should be provided in relation to the criteria for assessing landscape impact and secondly, that the requirement for formal Landscape Character Assessments be undertaken for all major developments would place an unnecessary burden upon developers.
13. Major Modification **MM82 [CD4]** addresses the first issue by adding eight assessment criterion imported from the Cumbria Landscape Character Assessment Toolkit, which the Council consider provides greater clarity for both the interpretation and application of the policy.
14. Major Modification **MM83 [CD4]** addresses the second issue by removing the requirement for a formal Landscape Character Assessment in favour of a ‘an assessment of the impact on the landscape character’ that is proportionate to the scale and expected impact of the development in relation to the surrounding character and context. The Council consider that this revised requirement is entirely reasonable and would not be contrary to the guidance set out in Paragraph 173 of the NPPF.

Cross-linkages with other Main Matters

15. Strong reference to landscape protection is also contained within Spatial Strategy and Growth Policy S3, which sets out the framework for future site allocations. Major Modification **MM16 [CD4]** to Policy S3 provides additional criteria in relation

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to landscape assessment criteria and considerations in the future site allocations process. The delegation of location decisions to subsequent documents is considered in more detail in Main Matter 5.

16. Given the level of landscape sensitivity there is a strong cross reference to the Solway Coast AONB within Renewable Energy and Low Carbon Technologies Policy S19. With reference to the limited landscape capacity of the area identified in the Solway Coast AONB Landscape and Seascape Character Assessment **[EB18]**, the AONB Management Plan **[SD23]** and the Cumbria Wind Energy SPD **[SD12]** only small scale renewable energy schemes will be supported. Energy provision, including renewable energy schemes, is considered in more detail in Main Matter 13.

17. Strong reference to landscape protection is also contained within the UNESCO Hadrians Wall World Heritage Site Policy S28, which relates to the protection of the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site. Regard and reference to the sensitivity of this historic landscape also is referred to within Tourism, Coastal and Countryside Recreation Policy S17 and Renewable Energy and Low Carbon Technologies Policy S19. The treatment of the World Heritage Site and its historic landscape is considered in more detail in Main Matter 17.