

Review of SG Landscape 2: Valued Views

1. Introduction

- 1.1 This paper is intended to review *SG Landscape 2: Valued views (SGLC2)* to assess how it accords with national policy in view of any changes, and if it continues to provide a suitable basis for protecting and enhancing Aberdeenshire's locally valued views and viewpoints.

2. Policy Approach

- 2.1 SGLC2 supports development that will not have an adverse impact on a view point or 'valued view' as identified in Appendix 1. Proposals should be of an appropriate scale and design in a suitable location that does not affect the overall integrity and quality of the view. It is intended to consider the view of a "thing" from a "place" and thus differs significantly from modern interpretations of landscape character.
- 2.2 In addition, a development should not have a negative impact on the characteristics and features for which the view is valued. The purpose of this policy is to identify views that are of local significance which the community at large would like to see protected and enhanced in the public interest. However, the designation does not carry the same material weight to that of national or even local landscape designations.
- 2.3 It is intended that this policy supports SG Landscape 1: Landscape Character but focuses on visual impact and the whole view as opposed to particular landscape features. It is concerned with the aesthetics of the landscape, rather than with the components that make up a specific landscape character type.
- 2.4 The current valued views have been compiled through consultation with elected members to represent the locally important views and are listed in Appendix 1 of SG LC2. The list of views was compiled back in 2005 and is incomplete: no 'valued views' were identified in the Banff and Buchan Area and at least one well known viewpoint (the Queens view, overlooking Deeside) is omitted. In addition, there is currently no supporting information such as maps of the views in the appendix.

3. Background

National context

- 3.1 Part 1.1 G of the European Landscape Convention (2000) states that '*All action taken to define, implement and monitor landscape policies should be preceded and accompanied by procedures for participation by members of the public and other relevant stakeholders, with the aim of enabling them to play an active role in formulating, implementing and monitoring landscape quality objectives*'. The valued views policy could be considered the 'accompaniment' procedure reflecting community and publicly valued views and landscapes.
- 3.2 Scottish Planning Policy (SPP) also states that '*International and national designations can be complemented by local designations which protect, enhance and encourage the enjoyment and understanding of locally important landscapes and natural heritage*'. It should be noted here however, that the emphasis is on landscape, and whether 'valued views' are part of this is uncertain.
- 3.3 The valued views policy aims to protect locally important views and to – as stipulated by SPP - '*safeguard and enhance the character and quality of*

landscapes which are important or particularly valued locally or regionally'. It adds that 'The reasons for designation should be clearly explained and the on-going relevance and function of local designations should be considered when development plans are prepared'.

- 3.4 SG LC2 is very much intended to protect and enhance the character of locally cherished viewpoints and promote them for wider community enjoyment in accordance with national policy. However, the focus of 'views' rather than landscapes provides some difficulty: 'views' are very subjective.

Strategic/regional context

- 3.5 The current draft of the Strategic Development Plan is concerned with the large scale and overarching strategic planning issues within Aberdeen Shire and City. Therefore, SGLC2 is not considered by regional level policy as it is locally determined and implemented.

4. Drivers of Change

- 4.1 SGLC2 is a new policy intended to reflect locally valued landscapes and afford them some protection from developments that may have an adverse impact on their quality and character. Local designations, particularly those that have had input from local stakeholders are actively encouraged both by the Landscape Convention and Scottish Planning Policy. However, it is not clear whether valued 'views' would be considered as part of this.
- 4.2 As it stands, SGLC2's aim of protecting the aesthetic nature of "locally valued" views is appropriate. However, as the policy is not a recognised landscape designation, it does not carry the same weight or level of protection which raises the question of how effective it can actually be. Identified views have a significant element of subjectivity and therefore it has to be questioned how robust the identified views are.
- 4.3 The current list of 'valued views' in appendix 1 has been identified by elected members in conjunction with community councils which, whilst has involved local input, are in many cases unclear and unspecific. The current policy does not provide any information of the qualities and features which elected members and local people are so keen to protect. They are from a range of locations, some of which are difficult to pinpoint and are potentially inaccessible, such as the '*view looking to Muchalls from mid-way across the moor*'. In addition, a large proportion of views are from roads which again are non specific and do not identify an actual point or place from which the view can be publicly seen and enjoyed. This means it is difficult to identify if the views meet part 1 of the policy which aim to protect the viewpoint.
- 4.4 In addition, some views themselves are also referenced in very general terms such as '*countryside to east of Inverurie*'. This is considered more reflective of an area of landscape rather than an actual valued view. Valued views' that are more consistent with landscape features should be identified within the Landscape Character Areas policy. In addition, there are also some valued views which are already nationally designated for their landscape or historic qualities. In these instances, inclusion within the valued views policy may not be required as they are already protected at a higher level such as designed landscapes or scheduled monuments (some of which are in prominent landscape locations).
- 4.5 It is considered that 'valued views' should be identified in terms of a view from a point to a place, landscape or feature. Ambiguity regarding what a 'valued view'

actually is and where it is from creates greater difficulty in assessing potential impacts of a proposal on that particular view. In light of these issues, it is considered that the current policy is not fit for purpose and will require a substantial overhaul. Different options have been discussed with relevant stakeholders and are explored through the following potential options.

Potential Options

Retain and Review

- 4.6 One option discussed would be to completely revise the current list of identified 'valued views'. This could still be undertaken in consultation with elected members', however with greater direction from planning/landscape professionals would be required.
- 4.7 A consistent approach and methodology for the identification of views should be established to ensure a more robust and coherent set of views. This should only include views from a point to a place, landscape or feature. Views must be from specific viewpoints where the view can be fully enjoyed and appreciated (i.e. not the side of a road that has no amenity to enjoy the view). In addition, the viewpoints must be publicly accessible and the focus of each view must be identified along with justification for its protection. OS viewpoints could be used as a guide in this instance.
- 4.8 In addition, SG LC2 does not currently provide maps or further information detailing the location of the views and why they are of value. The 'valued views' have been mapped on the internal GGP system however these are only indicative. Therefore, it would also be recommended that they are identified, visited, and photographed. Guidance should be prepared as an appendix to the supplementary guidance or as separate planning advice which includes maps of the valued views along with photographs demonstrating the 'view' that the policy aims to protect and why (i.e. what needs to be protected). It is considered that this would enhance the understanding and interpretation of the policy. It is not intended that the maps identify the entire scope of the view but to highlight the viewpoints from which the protected views can be seen and enjoyed in their entirety.

Replace

- 4.9 Another option would be to remove the valued views policy and introduce a replacement policy which identifies areas of local landscape value. The most appropriate way of doing this is yet to be established; however SNH have produced guidance on developing local landscape designations, which should be used to inform such a designation in Aberdeenshire.
- 4.10 The option of a replacement policy would require the involvement of a landscape professional to assist in accurately identifying these areas to avoid the inconsistency and ambiguity of the current policy. However, it has been noted that there are resource implications for this and options that can be undertaken using existing staff resources will also be explored. In addition, the guidance produced by SNH actively encourages local participation in the process, and again this will be further explored in liaison with relevant stakeholders. This option however is likely to take significant time (6-12 months is suggested by SNH) which would mean it could not be considered within the Main Issues Report.

Remove

- 4.11 The final option would be for the removal of the policy altogether with greater emphasis being placed on the use of Landscape Character Areas. Current monitoring figures indicate that the Landscape Character policy is being used significantly more than the valued views.
- 4.12 The current planning advice (12/2012) supporting SG LC1 identifies sensitivities within each landscape character area. Part of this approach could also involve identifying and mapping these 'sensitivities' as part of policy SG LC1. This would provide a way of highlighting greater sensitivities within each landscape in a clear and concise way which could also be more easily interpreted. This could also provide an interim solution to the absence of a valued views policy, while a more comprehensive local landscape designation is progressed.
- 4.13 Finally, it should also be considered whether such a policy would be better placed within the layout, siting and design policy on the basis it emerged out of ALP Gen/2 which required proposals to 'respect important public views'.

5. Recommendations

5.1 On the basis of this information it is recommended that;

- The valued views in Appendix 1 are reviewed (possibly in consultation with elected members and professional landscape guidance) to create a more consistent set of views that should be protected as well as publicly accessed and enjoyed. A basis for this could include using viewpoints already identified on an OS map. In this instance, guidance should be prepared through an appendix to the policy or planning advice to provide greater detail of each valued view. It is proposed that this guidance should identify the point from which the view can be seen along with a photograph of the view that the policy seeks to protect. In addition, information should be provided stipulating why the view is of particular value. This is intended to offer greater clarity for those trying to establish if the policy is applicable in relation to a proposed development.

Or

SG LC1 is replaced with an alternative local landscape designation. This should be informed by professional landscape advice and could be undertaken with some form of community involvement. This option would be required to be carried out independent from the Main Issues Report on the basis of time and resource constraints. However, it could be progressed in due course and added to the plan at a later point.

Or

Remove the policy entirely and place greater emphasis on the pre-existing sensitivities identified in the Landscape character planning advice (12/2012). The sensitivities should be identified in SG LC2 to provide greater weight to the policy.

6. Summary of Main Points

- 6.1 SGLC2 currently provides an important means of protecting valued views and landscapes which have been identified by local stakeholders and elected members. The policy encourages development that will not have significant or adverse effects on the overall quality of the identified valued views. Local designations, particularly with regard to landscape are supported by European

policy through the Landscape Convention as well as Scottish Planning Policy. However, the question arises of whether the valued views policy is in fact a 'landscape' policy and a 'designation'. It is considered that the aim of SGLC2 to provide adequate protection to special landscapes is appropriate; however the views create significant difficulty and need to be addressed. The views identified are currently very general and unspecific meaning that it can be difficult to apply the policy and it is recommended that they are substantially reviewed, replaced with a more fit for purpose 'local landscape designation' or removed altogether.

- 6.2 If the option of review is pursued, for the purposes of consistency it is recommended that each is identified in terms of a view from a specific point. In addition, the valued view must be able to be viewed from a specific point where it can be fully appreciated (i.e. not from a road unless particular provision is made) and should be publicly accessible (not on private land or for example a golf course which is not for public use). It is also recommended that an appendix to the policy or planning advice is prepared to provide further guidance on the scope of the view and the qualities for which it has been identified. This should include maps and photographs of the viewpoints from which the valued view can be seen. It is considered that this will provide greater clarity for those reading interpreting and applying the policy. If the option for replacement is pursued, an approach to developing a local landscape style designation will need to be explored.

References

Aberdeenshire Council (2012) *Aberdeenshire Local Development Plan 2012*

Aberdeen City and Shire Strategic Development Plan Authority (2013) *Draft Strategic Development Plan*

European Landscape Convention 2000

Scottish Government (2010) *Scottish Planning Policy*