

# Local Landscape Areas - revised guidance consultation

## Page 2: RESPONDENT INFORMATION FORM

Q1. Are you responding as an individual or an organisation?

Organisation

Q2. Your name or your organisation/ group name

**Name** Chartered Institute for Archaeologists

Q3. email

**Email** rob.jennox@archaeologists.net

Q4. How do you wish your response to be treated?

Publish response with name.

Q5. If required, may we contact you regarding your response?

Yes

## Page 3: CONSULTATION QUESTIONS

Q6. 1) Is the draft guidance clear, easy to follow and to implement? Please explain which sections are clear or not clear, and why this is.

Some sections

**Comments/explanations:**

The guidance is largely clear and easy to follow, but we have a concern that there are some crucial aspects of the purpose of the designation which are unclear. We strongly support the use of Local Landscape Areas as a way to ensure positive place-making and natural, resilient places – as per the principle aim of Scottish Planning Policy (SPP). We are also pleased with the holistic approach to understanding landscape in terms of natural and historic landscape elements, and wider visual and landscape character-based assessments. We are strongly in favour of tying this guidance into existing frameworks for managing the historic and natural environment such as Our Place in Time, and for the broad appreciation of the value of heritage to communities, and the economy. We also strongly support the approach to valuing landscape based on a wide set of values shaped by communities. However, we are confused as to exactly how Local Landscape Areas (LLAs) are to be used in this regard. Various comments throughout the guidance appear at odds and therefore there is a confusion over whether LLAs are in fact a designation which is led by an 'all-landscape' approach (i.e. one which recognises that any place can have significance and that local communities and authorities should create opportunities to promote place-making in any area), or a 'best-landscape' approach, promoting designation based on special criteria, and therefore subject to objectivised thresholds of quality. For example, paragraph 1.3 states that 'designation recognises that a specific [area] has special importance'. This mirrors approaches taken to areas designations such as conservation areas, which use value thresholds determined by experts to judge quality. On the other hand, paragraph 1.13 recognises that many local authorities use a principle that 'all places deserve attention'. We are not sure from the guidance how these two approaches are satisfactorily reconciled in the use of LLAs. Related to this point is the purpose of community engagement. The guidance does not identify what decisions local communities are being consulted on, and to what extent a local community should be able to drive a designation 'bottom-up' rather than contribute to a 'top-down' selection process. Furthermore, the way in which LLAs are promoted to communities will likely make an important difference to what responses are received in any consultation. Some of the case studies refer to consultations based around people's 'favourite' landscapes. A different result would be yielded if the approach to community was to consider what about their local landscape makes it important. This again illustrates a nuanced difference between an all-landscape approach and a special interest/best-landscape approach to the designation. Clearer guidance on the criteria and method of selecting and researching candidate LLAs, and the stages at which consultation should take place on key decisions of identification would also be useful to clarify this issue. For example, it is not clear whether a candidate LLA could be identified on the basis of strong community interest, regardless of any expert assessment of quality. It may be useful to consider whether community-led research could be included in the description of Step 5 – field survey. Some simple methodologies exist for allowing communities to do this. For example, the Place Check tool, developed by English Heritage and used extensively in England for Neighbourhood Plans.

Q7. 2) Are there any other aspects that the guidance has omitted, but should cover?

We believe that this guidance could helpfully cover advice on how local authorities should or could act to promote LLAs to communities. For example, it is unclear in the guidance whether communities are currently aware of LLAs and the potential for designations in their local areas. This seems critical to the achievement of the stated goal of LLAs to increase local understanding and appreciation of local landscapes among communities. This cannot be achieved without a process of awareness raising and engagement.

Q8. 3) The current published (2006) guidance advocates naming local landscape designations 'Special Landscape Areas'. To reflect Scottish Planning Policy, our new draft guidance uses the term 'Local Landscape Areas'. Do you agree with this approach or not, and why?

Yes

**Comments/explanations:**

In principle, we agree that ensuring a consistency in naming is a good idea, and that in technical terms Local Landscape Area is a better description than Special Landscape Area. This is because in Scottish Planning Policy the term special is used in relation to designations such as National Parks, and listed buildings. Special interest is thus a term that denotes exclusive qualities. If LLAs have an all-landscape approach, this implication is not necessarily appropriate. The word 'local' also makes clear that the designation is not a national or international one and therefore confers a lower level of protection than, for example, the similarly named 'Special Protected Areas'. However, given that many local plans which use the term Special Landscape Areas are currently in force, the name change may cause confusion in some areas, and take years for local policies to be updated.

Q9. 4) The draft guidance includes a limited number of illustrative case studies. a) Are the case studies relevant and helpful or not? Please explain your answer. b) Are there other aspects of the guidance that could usefully be illustrated with case studies, and can you suggest examples to use?

Only in part

**Comments/explanations/examples:**

The examples are useful, but the guidance states that it aims to promote 'greater consistency in the selection and application of LLAs by local authorities, and the examples selected all show varying approaches to the use and processes for selection and designation.

Q10. 5) Some Planning Authorities have recently reviewed their local landscape designation. When preparing their next Local Development Plan, a full review is therefore unlikely to be necessary. Do you have an example of how a 'light touch review' was carried out successfully?

No comment.

## Page 4: ALMOST DONE.....

Q11. Do you have any further comments to make regarding the Local Landscapes Areas guidance?

No.