

Special Landscape Areas/Landscape Character Assessments

Second deposit revised Local Development Plan (Carmarthenshire CC)

Consultation expires 14.04.23, 4:30pm.

- 1) The existing LDP was adopted by the Council on 10.02.2014 for the period to 2021. Carms CC has been allowed by WG to continue to use the existing LDP until the second revised LDP is adopted by a resolution of elected councillors. WG has allowed a further period for consultation, as the first consultation was affected by Covid.
- 2) The current LDP will remain in place until the second revised LDP (2018-2022) is adopted by the Council.
- 3) The existing LDP contains a policy creating Special Landscape Areas. The policy is reproduced below:

## Policy EQ6 Special Landscape Areas

**Special Landscape Areas are designated in the following locations and as identified on the Proposals Map:**

Tywi						Valley
Carmarthenshire						Ridge
Teifi						Valley
Drefach						Velindre
Bran	Valley	(North	of			Llandovery)
Mynydd						Mallaen
Llanllwni						Mountain
North		Eastern				Uplands
Mynydd		y				Betws
Gwendraeth						Levels
Pembrey						Mountain
Swiss						Valley
Talley						
Lwchwr						Valley
Lower		Taf				Valley
Cwm						Cathan
Cothi						Valley
Carmarthen Bay and Estuaries						

**Proposals for development which enhance or improve the Special Landscape Areas through their design, appearance and landscape schemes will be permitted (subject to the policies and proposals of this Plan).**

**Strategic Objectives Supported:** SO1, SO4, SO5, SO6, SO7, SO8 and SO12

*This policy should be read in conjunction with other relevant policies and proposals of this LDP.*

6.6.35 Special Landscape Areas (SLAs) represents a non-statutory designation which were identified following a formal assessment of the landscape qualities of the County. Their designation utilised the former CCW's Guidance Note in applying the results from the LANDMAP data. In this regard their designation reflects the aspect areas defined within

LANDMAP and seeks to utilise 'outstanding' categorisations supported where appropriate by those classified as 'high'.

6.6.36 LANDMAP is a Wales wide approach to landscape assessment which describes and evaluates aspects of landscapes and can be used by authorities in informing policy and decision making. It identifies five 'aspect areas': geological landscape, visual and sensory, landscape habitat, cultural landscape, and historic landscape.

6.6.37 Whilst not intended to necessarily preclude development, it is intended to reflect the emphasis placed upon the term 'special' in their definition. The design of developments should be sensitive enough to ensure that the scheme makes a positive contribution to the landscape. In this regard, proposals will be expected to show that they will not have an unacceptable impact on their specific distinctive features or characteristics of the SLA. Development proposals adjoining, or which impact upon a SLA will also be considered in accordance with the provisions of this policy.

6.6.38 Those settlements defined as part of a SC, where surrounded by an SLA, are considered to form part of the designation. Those Growth Areas, Service Centres and Local Service Centres within a SLA will not be considered part of the designation, however their potential impacts will be duly considered in line with the above statement in relation to development proposals adjoining or which impact upon an SLA.

6.6.39 The Council will, in determining appropriate planning applications, have regard to the LANDMAP information system as a material planning consideration in considering the impact of any proposal on the County's landscape qualities. Consideration should be given to the enhancement of quality by means such as character creation and restoration as and where appropriate.

6.6.40 A description of each SLA identifying its characteristics and landscape features is set out within Appendix 4. SPG will be prepared in respect of management considerations within SLA's and general design advice. The use of the SLA policy will be monitored within the LDP monitoring framework.

4) The Towy Valley is one of 18 designated SLAs. The area of the Towy Valley SLA is as identified on the proposals map.

5) Appendix 4 of the existing LPA has the purpose of defining the characteristics of the SLA's. The part of Appendix 4, relevant to the Tywi Valley SLA is reproduced below.

## **APPENDIX 4 - SPECIAL LANDSCAPE AREAS**

### **INTRODUCTION**

Following guidance from Natural Resources Wales, and using Landmap information, the Special Landscape Areas (SLAs) in Carmarthenshire have been reviewed and updated for the purposes of the emerging Local Development Plan. At the outset of this project it was established that the landscapes in Carmarthenshire that are considered to be of greatest

importance, and which are worthy of the protection that the designation of Special Landscape Area provides are the:

- River valleys
- Upland landscapes
- Coastal landscapes

The proposed SLAs have been grouped according to these landscape types are described below.

<b>Using</b>	<b>Landmap</b>	<b>information</b>
<p>All counties and National Parks in Wales have completed Landmap assessments. These assessments are based of five layers of landscape information and this information can be used to assist itnhe process of identifying SLAs. The data is map based and held within a Geographic Information System. For the purposes of identifying the landscapes that are considered to be important in the Carmarthenshire the visual and sensory information is particularly important, but the other sets of data have also been used. For example the historic landscape layer also identifies Llanllwni Mountain and Drefach Velindre as being important landscapes. The landscape habitats layer identifies the coastal landscapes as being of importance.</p>		

## **RIVER VALLEYS**

<b>Tywi</b>	<b>Valley</b>
<p>The Special Landscape Area (SLA) includes the entire river valley apart from the Tywi estuary, which forms a part of the Carmarthen Bay and Estuaries SLA. The Tywi Valley SLA consists of the valley floor and associated slopes, and includes number of different landscapes. The upper Tywi Valley, north of Rhandirmwyn is typically narrow, rising steeply on either side to the more rugged upland landscapes of Mynydd Mallaen and the North Eastern Uplands, both of which are SLAs in their own right. The upper Tywi Valley is characterised by small fields, hedgerows, woodland, traditional farms, narrow roads, and the river itself, often bordered by trees, but in places by open meadows.</p>	

Moving down stream towards Rhandirmwyn and Llandovery, the mid Tywi valley opens out more, but the valley continues to rise up to the open hill land. The landscape is well wooded with a significant number of hedgerow and other individual trees. Here there is more open flat agricultural land, some small settlements - Rhandirmwyn and Cilycwm, both dominated by traditional buildings and vernacular architecture. These are harmonious unspoilt rural landscapes.

The lower Tywi valley down stream of Llandovery consists of the wide level flood plain, together with its northern and southern slopes which provide outstanding views over the valley and from the north towards the Brecon Beacons. Although dominated by agricultural land and larger fields than in the mid and upper valley, the flood plain also has a significant number of mature hedgerow and fields trees, and the valley slopes, particularly the steeper southern slopes are well wooded. Historic parklands and castles are also a feature of this part of the valley, e.g. Gelli Aur and Dinefwr Park, and Dinefwr and Dryslwyn castles. The castles in the valley have imposing locations on limestone outcrops, over looking the valley. Traditional farms in the valley have typically expanded and often now include large agricultural buildings. Most of the settlements in this part of the valley have also grown with an element of modern building around a more traditional core. Inappropriate development continues to threaten the conservation of this outstanding landscape, hence the reason for its designation

6) The designation as a SLA would not of itself preclude the placing of new electric lines within or through an area designated as a SLA, as the designation is non-statutory .It could be taken into account, if WG consider an application for a DNS, but would not bind the decision maker. Mynydd y Betws is one of the 18 designated sites. Mynydd Y Betws is subject to a windfarm.

7) Policy EQ6, creating and defining special landscape areas, does not appear in the second revised LDP.

8) However, the second revised LDP would contain the Strategic Policy SP15, which is for the protection and enhancement of the built and historic environment i to safeguard the cultural integrity of the historic settlements, features and buildings. The revised LDP recognises that our historic assets are irreplaceable resources, and their conservation provides social, cultural, economic and environmental benefits.

9) Importantly, the second revised LDP also contains Policy BHE2 (paragraph 11.45), confirming that development proposals should relate to the specific landscape and visual characteristics of the local area, ensuring the overall integrity of landscape character is maintained by respecting and conserving specific landscape features and protecting key landscape views and visitors.

10 The second revised LDP confirms that Carmarthenshire is characterised by diverse and high-quality landscape resources and areas of notable visual value:

a) Paragraph 11.457- these provide significant environment, economic and social benefits and help to create a sense of place.

b) Paragraph 11.459- this policy (BHE2) will be supported by a landscape character assessment and supplementary planning guidance (SPG).

c) Paragraph 11.460-the SPG will identify and describe distinctive landscape character areas and types throughout the plan area.

d) Paragraph 11.461- in this respect the purpose of the policy is to reflect the specific distinctiveness, qualities and sensitivities of the counties landscape components.

11) It is important to understand the nature of a Land Character Assessment (LCA) – the process of identifying and describing variation in the character of landscape. It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive. The process results in a landscape character assessment which describes the landscape with reference to the characteristics that make a place distinctive, to:

a) Inform understanding of key characteristics.

b) Inform judgements and decision making.

c) Inform re green infrastructure plans and strategies.

d) To provide baseline evidence at the appropriate scale to inform a range of decisions.

- e) To provide an understanding of how a place is experienced, perceived and valued by people.
- f) To identify the key characteristics that together create a sense of place and the unique character of an area.

12) The second revised LDP confirms it is intended to define strategy, proposal, policies, and allocation for all of Carmarthenshire, save for the national park, that it is intended to identify areas where policy / design are intended to protect and enhance the environment from inappropriate development, and to be used for assessing planning applications until 2033, as a foundation for clear and consistent decision making; 'the objective is to include protection and enhancement of our environment'.

13) The second revised LDP also contains statements of intent and policy towards the need for renewable energy but with enhancement and protection of tourism/ visitor sectors and landscape and historic sites:

- a) Policy SP16 'Climate Change' – focuses more on reduction of energy use than energy generation.
- b) Policy CCH1 and Policy CCH 2 – for renewable wind energy within pre-assessed and outside pre-assessed areas and local search areas – confirm that proposals should not have an unacceptable impact on electromagnetic interference with communication installations or other telecommunication systems and the proposals will not cause an unreasonable risk or nuisance to, and impact upon the amenities of, nearby residents and members of the public and, as to those developments proposed outside of pre-assessed areas, they will not have an unacceptable impact on visual amenity or landscape character through the number, scale, design or siting of turbines and associated infrastructure and the development will not have an unacceptable impact in areas designated for their landscape value.
- c) Paragraph 11.48, Welsh ministers to determine as a DNS any application for onshore wind generation of 10Mw or more.
- d) The LDP confirms the importance of rural economy. Paragraph 4.41, a buoyant rural economy is needed to support the overall growth of the county – to help sustain community life'. "Sustainable tourism provides a key means of delivering this growth and of providing good quality local jobs". Paragraph 4.45, the natural beauty of the county is a major factor on which the local tourism and recreational industries depend. Biodiversity is fundamental to the physical, economic and spiritual wellbeing of all who live and work in Carmarthenshire. Paragraph 5.6- we want a buoyant visitor economy with potential to grow.
- e) Paragraph 5.6 (12), beauty, peace and quiet, open green spaces and fresh air are also contributors to happiness in rural areas.
- f) Paragraph S02 confirms the importance of wellbeing opportunities through access to community, leisure and recreational facilities as well as the countryside.
- g) Paragraph S05 confirms the need to safeguard and enhance the built and historic environment.

h) Paragraph S07 – to make a significant contribution towards tackling the cause and adopting to the effect of climate change, including promoting renewable energy and safeguarding resources.

l) Paragraph S09, to protect and enhance the diverse character, distinctiveness, safety and vibrancy of the counties communities, by promoting a place making approach and a sense of place.

j) Paragraph S013, to make provision for sustainable and high quality all year round tourism related incentives.

k) Paragraph 9.33, the LDP will promote sustainability by protecting and enhancing biodiversity, towns and landscapes.

l) Paragraph 9.57, the components of the strategy are to reflect the needs of rural areas and the rural economy. To provide opportunity to cater for the visitor community. To protect and enhance the natural, historic and built conservation qualities of Carmarthenshire and its high value landscapes.

m) Paragraph 11.22- tourism is a key component of the Carmarthenshire economy. It generates £400-500 million of revenue to the county's economy annually.

n) Carmarthenshire is the cycling hub of Wales.

m) The counties heritage and activity tourism potential are renowned, whilst its natural environment can appeal to the wellbeing tourism sector.

There have been some comments directed towards Carms CC in the press, which could be considered, in the tone used and in nature, as unhelpful. In consequence, some members of the community have raised questions regarding the proposal to replace SLA's with Character Land Assessments.

The questions raised to me, and my replies, are set out below:

- a. Is this a cause for concern, relevant to the pylons proposed or generally?

Ans – No. A SLA is a non-statutory landscape designation. As a non-statutory designation it cannot by itself defeat an application for grid structure determined as a DNS by WG. Also the SLA definition and characteristics in the current LDP seem brief and insufficient and could have far more relevance and weight if defined in greater detail by way of an Landscape Character Assessment. Whilst the SLA designation is available to be used by local planning authorities to define areas of high landscape importance, the Character Landscape Assessments could be far more effective.

- b. Why have SLAs been dropped?

Ans – We are told to improve on the designation and protection of special areas by way of LCA, which should be more effective.

- c. Is there a suitable alternative to SLA's.

Ans – The LCA should give far more detail as to the character and qualities to be preserved in each designated area and could be more effective than an SLA.

- d. Will a suitable alternative (CLA) be implemented before or simultaneous with the second revised LDP?

Ans – The cabinet member responsible for planning has confirmed this will be the case.

- e. Is there some form of conspiracy on the part of Carms CC to drop SLAs to lessen opposition or make it easier for energy developers to construct energy sources or associated infrastructure within or through the existing SLAs?

Ans – It is apparent from the second revised LDP that Carmarthenshire County Council places a high emphasis on protecting the natural beauty of Carmarthenshire and protecting historic sites and tourism/visitor activity which are identified as a key element of the local economy. This is consistent with the lead taken by Carmarthenshire County Council in responding to oppose the Green Gen proposals.

- f. Is Carms CC in favour of and encouraging the Green Gen Tawy Usk proposal?

Ans –No. The elected council members passed a motion unanimously on 1 March 2023 which states: “That Carmarthenshire County Council supports residents' and local businesses' concerns regarding the proposal to erect pylons to link Nant Mithil Energy Park to the National Grid in Carmarthenshire; believes that Bute Energy should work with landowners to place the cables underground; and that we, as an Authority, write formally to the energy firm to support the concerns raised.”

Also, the Council has refused to allow Green Gen entry onto land owned by the Council which Green Gen had earmarked for pylons.

it is important to feedback to the Council, as part of the consultation process, in a way which is constructive, which is accurate, which reflects the importance of Carms CC as a landowner and statutory consultee in any DNS process, and which reflects the assurance confirmed by the Cabinet Minister for Planning, that removal of SLA's is to allow replacement by CLAs which can provide improved protection and definition for those areas which are currently designated as SLAs and enhance their protection . The constructive feedback could be:

It would be better to define the CLA areas (to include the existing SLA areas) within the second revised LDP( including a plan as an appendix to define the extent and location of each area) and to include as an appendix to the second revised LDP the characteristics and qualities assessed by way of each Land Character Assessment .By including reference in the revised LDP to the LCAs by way of a specific policy directive, this is likely to have more weight than an SPG. This will enshrine the LCAs within the LDP and confirm the assurance that the LCA designation and descriptions will be in place immediately upon adoption of the LDP and will be implemented without the possibility, inadvertently, of an interval between termination of SLAs and adoption of LCAs. Further there should be a consultation process to allow observation and comment as to the areas designated within LCAs and the characteristics and features recorded.

It is for each person to arrive at their own subjective assessment, and this resume is not intended or provided by way of advice, but confirms the feedback I intend to provide within the consultation process and the reasons for that response.

Gary Jones 11/4/23