# Matters Arising Changes Consultation Responses

<table>
<thead>
<tr>
<th>Resp No.</th>
<th>Rep No.</th>
<th>Name</th>
<th>MAC</th>
<th>Comments</th>
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<tr>
<td>MACResp01 001</td>
<td>Welsh Government</td>
<td>MAC 7 (Appendix 2)</td>
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<td>We consider the Authority has addressed the majority of our concerns expressed in Deposit / Focussed change representations and through the examination hearing sessions and statements. On this basis we have only one outstanding objection to the MACs under the tests of soundness, which is set out below: <strong>1. MAC 28 - Policy E1: Minerals Safeguarding - Objection Maintained</strong> - To align with the requirements of the Chief Planning Officer’s (CPO) letter dated November 2012, the Authority should safeguard Category 2 mineral resources as set out in the BGS Aggregates Safeguarding Map of Wales and to which the letter refers.</td>
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<tr>
<td>MACResp02 001</td>
<td>Dŵr Cymru</td>
<td>MAC 7 (Appendix 2)</td>
<td></td>
<td>The table in Appendix 2 on delivery evidence on housing allocations contains the estimated distance from the allocated sites to the nearest water mains and sewers, but they do not correspond to the information that Dwr Cymru hold on their GIS systems.</td>
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<tr>
<td>MACResp02 002</td>
<td>Dŵr Cymru</td>
<td>MAC 7 (Appendix 2)</td>
<td></td>
<td>The constraints related to sewerage infrastructure in Bala should be reflected in the table on delivery evidence on housing allocations.</td>
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| MACResp02 003 | Dŵr Cymru | MAC 7 (Appendix 2) |           | We note that MAC 7 proposes to include a table detailing the delivery of site allocations as an appendix to the LDP (Appendix 2 in the MAC document DA022).  
This table has previously been included in ‘Background Paper 7A – Housing 2, Appendix 5, November 2017’. During the Focussed Changes consultation in April 2018 Welsh Water’s representation highlighted that the table contains the estimated distance from the allocated sites to the nearest water mains and sewers, but that they did not correspond to the information that we hold on our GIS systems. We provided a table of the approximate distances to Welsh Water services (in metres) which I have provided again below: |
In addition, we also highlighted the constraints related to sewerage infrastructure in Bala in our representation at the Deposit Stage 2017, this information should be reflected in the table. We provide a copy of our deposit plan representation for your convenience.

The outline masterplan will need to be supported by a landscape and visual impact assessment and demonstrate how the siting, scale, design and character of the development will minimise adverse effects upon the landscape character, visual amenity, natural environment and cultural heritage of the National Park.’

The word ‘minimise’ is inappropriate in this context as any development should be furthering the statutory purposes of the National Park. The wording of the latter part of this sentence therefore needs to be amended and we suggest the following ‘...demonstrate how the siting, scale, design and character of the development will conserve and enhance the landscape character, visual amenity, natural environment and cultural heritage of the National Park.’
| MACResp03 | 002 | Campaign for National Parks | MAC 12 | The same concern applies to the use of the word ‘minimises’ in part A ii of this policy which should be replaced with ‘avoids’, ‘removes’ or ‘prevents’. Using ‘minimises’ here is also inconsistent with the second criterion in Section B: Llanbedr that ‘there are no unacceptable significant effects on the landscape or visual amenity’. This latter wording is far more appropriate. |
| MACResp03 | 003 | Campaign for National Parks | MAC 12 | Similarly, part A iv: ‘The landscape lead master plan has demonstrated that the development does not result in an adverse effect on the landscape character or have an inappropriate visual impact’ should be reinstated. |
| MACResp03 | 004 | Campaign for National Parks | MAC 13 | We support the second criterion in the text which has been inserted here requiring that ‘there are no unacceptable significant effects on the landscape or visual amenity’ from development proposals outside the Indicative Focus Area. |
| MACResp03 | 005 | Campaign for National Parks | MAC 13 | We believe that the same criterion should apply to development proposals within the Indicative Focus Area and that the plan should be changed in order to ensure that it is consistent with meeting the statutory National Park purposes. We suggest the following wording to maximise clarity and consistency: ‘Development proposals within the Welsh Government Enterprise Zone Designation (EZD) and the Local Development Plan’s Indicative Focus Area (IFA) should have no unacceptable significant effects on the landscape or visual amenity. Where development is proposed within the EZD but outside of the IFA, the following criteria should also be met: |
| | | | | • detailed proposals will need to demonstrate that the proposed development incorporates appropriate and acceptable flood risk mitigation measures agreed with NRW; |
| | | | | • sufficient evidence has been provided that the site demonstrates the least impact upon the landscape, visual amenity, environmental and cultural heritage; |
| | | | | • the development is not located in an area which will prevent the use of the main runway; |
| | | | | • the development should not adversely affect the integrity of European designated sites; |
| | | | | • sufficient evidence has been provided to justify why the development cannot be located in the indicative focus area.’ |
| MACResp04 | 001 | Snowdonia Society | MAC 12 | ‘The outline masterplan will need to be supported by a landscape and visual impact assessment and demonstrate how the siting, scale, design and character of the development will minimise adverse effects upon the landscape character, visual amenity, natural environment and cultural heritage of the National Park.’ The word ‘minimise’ is inappropriate and ambiguous here and we object to it. In a National Park it is not sufficient for the planning process to make the impacts of a development on the landscape less catastrophic than they would otherwise have been. In order to be sound, policy in a |
National Park needs to actively prevent significant adverse impacts. We therefore request that ‘minimise...’ is replaced by ‘not result in significant ...’ (consistent with the rephrasing that we suggest below in criterion A ii).

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| A ii. New wording inserted here at the MAC stage also changes the policy materially. Criterion A ii now says that ‘The siting, height, form and scale materials and use of colour within of the development assists its landscape integration and **minimises** [our emphasis] significant adverse effects upon the landscape character and visual amenity’ As proposed the new wording makes significant landscape harm permissible, so long as an attempt has been made to minimise it.

A iv. Up to Examination stage, the policy in regard to Enterprise Zone sites at Llanbedr and Trawsfynydd included this criterion: ‘The landscape lead master plan has demonstrated that the development **does not result in an adverse effect on the landscape character** [our emphasis] or have an inappropriate visual impact.’ This criterion is now proposed to be deleted. The 'Reasons for change' column does not explain why the above changes have been made or how they can be consistent with National Park purposes.

We object to the use of the word ‘minimises’ in criterion A ii. If criterion A iv is to be deleted, then we request that criterion A ii should be worded as follows to provide the appropriate level of clarity and protection in a National Park: ‘The siting, height, form and scale materials and use of colour within of the development assists its landscape integration and **does not result in significant adverse effects on landscape character and visual amenity**’.

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| We are broadly content with the additional criteria on any development in the Enterprise Zone outside the Indicative Focus Area (IFA), except the second bullet point which we request is deleted. Our reason is that the second bullet point conflicts in its phraseology and meaning with the corresponding test earlier in the policy that applies to the whole EZ, including land in the Llanbedr site but outside the IFA.

The phrase ‘no unacceptable significant effects’ in the second bullet point introduces the ambiguous word ‘unacceptable’ and is confusingly different to either ‘minimise/es significant adverse effects’ (to which we object for reasons above) or ‘not result in significant adverse effects’ (the test we propose is appropriate in a National Park).

In the third bullet, we suggest that a word has been omitted by mistake - ‘environment’ should surely be ‘natural environment’ (as in the new second paragraph inserted in Policy 27). Otherwise it is unclear what ‘environment’ refers to.
Further to the recent consultation we write to advise you that we cannot support the proposed modifications detailed under MAC number 28, on Page 52 and referring to Paragraph 3.41. There are a number of reasons why the approach proposed is not appropriate.

Firstly, Planning Policy Wales (PPW) (paragraph 14.2.1) does not seek to differentiate between areas of differing landscape value when addressing the specific requirement of the national policy to safeguard mineral resources. Mineral safeguarding does not necessarily indicate an acceptance of mineral working, but seeks to ensure mineral deposits which society may need, in the future, are safeguarded. Safeguarding is not specific to whether or not the mineral resource is of local, regional national or international importance.

In the absence of planning guidance in Wales supporting PPW and relating to this specific issue, it would seem logical to examine other established planning guidance relating to minerals safeguarding and National Parks such as that cited in the Planning Practice Guidance (PPG) in England. The National Parks in Wales and in England were established under the same legislation and have a comparable level of protection and policy consideration. Further, the tests relating to development in National Parks in England and Wales are also comparable. The PPG is clear, that in response to the question posed "Is it appropriate to safeguard mineral resources in designated areas.....? "Safeguarding of mineral resources should be defined in designated areas" (our underlining).

PPW (paragraph 14.7.3) requires that “areas to be safeguarded should be identified on proposals maps and policies should protect mineral resources from other types of permanent development......” Again the requirements of PPW do not differentiate between areas of differing landscape value.

In National Parks it can be appropriate to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important. (PPW 4.11.10). The wording proposed in paragraph 3.41 does not seek to safeguard these important mineral resources.

In addition, the wording proposed in paragraph 3.41 seeks only to safeguard “Category 1” aggregates. These are defined in the plan as “Resources deemed to be of national significance at the Wales level (some resources may be of UK significance). They may be resources with limited occurrence, and therefore susceptible to sterilisation, or those which are economically important due to their high quality/purity and/or scarcity.” The plan also defines Category 2 resources which “have been mapped by the BGS, these are those of less than national significance, but which may be important at a regional or local
level” and Category 3 resources, “which have not been mapped by BGS are low grade aggregates used at a local scale (e.g. for use on farms etc.) when no better quality aggregates are available”. The proposed wording intimates that Category 2 resources are low grade, which conflicts with the categories identified in the plan.

The proposed approach seeks the inclusion of the proposed wording in order to remove a “burden on developers in the National Park demonstrating the resource is not economically viable”. This approach to minerals safeguarding is not recognised and is not supported by PPW.

The concluding sentence proposed suggests that Category 2 aggregates are to a great extent protected by other National and Local policies. We fail to see how such wording would stand scrutiny at a public inquiry.

We are therefore of the firm opinion that Category 1 and Category 2 resources identified in the plan area should be safeguarded on the proposals map; the proposed wording in paragraph 3.41 be deleted; and new wording added which would safeguard mineral resources in a clear and proper manner which would accord with PPW and not through luck, by a “back door” approach.

We trust these comments will be given proper consideration and appropriate amendments made to the text.

MACResp06 001 NRW MAC 13 We welcome the minor amendments to the wording of Part B.

MACResp06 002 NRW MAC 13 However, we have some concerns in relation to the new proposed text which focuses on potential development located outside of the “indicative focus area”. In particular, the proposed change in text states that where development is proposed outside of the “indicative focus area” that “detailed proposals will need to demonstrate that the proposed development incorporates appropriate and acceptable flood risk mitigation measures”. As your Authority is aware, the Strategic Flood Consequences Assessment for Llanbedr Airfield identified parts of the north eastern and north western portions of the Enterprise Zone that would not be suitable for development due to flood risk. There are clearly risks therefore that development outside of the “indicative focus area” may not be able to include appropriate mitigation measures to ensure that flood risks can be acceptably managed in accordance of TAN15. The proposed text would therefore benefit from further clarifications in terms of the locations within the wider Enterprise Zones where the SFCA has identified that development would not be suitable. We also acknowledge that there are large areas within the Enterprise Zone that have been identified as being at low flood risk in the SFCA, so we understand the need to allow some “controlled flexibility” in relation to development outside of the “indicative focus area”. 
| MACResp06 003 NRW | MAC 13 | In addition, we would advise that any required flood risk mitigation should be approved by the Local Planning Authority in consultation with Natural Resources Wales as it is a material consideration for both parties, and we would recommend that the text be updated to reflect this. |
| MACResp06 004 NRW | MAC 13 | The SEA/SA Matters Arising Changes document also acknowledges that “Further Assessment Required” in relation to MAC13 (Llanbedr) and we would welcome clarification of what additional assessment will be carried out to justify the proposed change of approach when considering development outside of the focus area. |
| MACResp06 005 NRW | MAC 19 | The SFCA has identified that land within the “indicative focus area” is at potential flood risk, and has identified that approximately 10.5 ha of land within the focus area will need to be raised. This measure is required in order to reduce flood risks and manage the consequences of flooding in accordance with TAN15. This is contrary to the text within this section, which states that the focus area falls outside of the area at flood. |
| MACResp06 006 NRW | Llanbedr Enterprize Zone – Landscape Assessment | We note that NRW’s recommendations for the assessment of the landscape impact of development at Llanbedr Enterprise Zone have been incorporated by the MACs. We thank you for consulting Natural Resources Wales and trust that our comments will be of assistance to you. Please do not hesitate to contact us if we can be of any further assistance to you. |
| MACResp07 001 GVA - SEZ | MAC 12 | We acknowledge and agree with the proposed removal of the word ‘detailed’ from the first sentence of Development Policy 27 and its replacement with the words ‘landscape led outline’ masterplan. Landscape led outline masterplans for each site is considered a more appropriate and proportionate requirement given that both the Llanbedr and Trawsfynydd sites are existing developed sites within the National Park. However, we must maintain our previous objection to the proposed introductory paragraph of the amended policy which states: “A landscape led outline Masterplan will need to be produced for both Llanbedr and Trawsfynydd sites and agreed with the Authority. The Masterplan will contain a development brief, a design statement, and a schedule identifying the phasing of development and associated infrastructure improvements required for each stage, before any development commences.” On the one hand, we understand the Authority’s aim of having a clear strategic framework for the development of both sites and are happy to work closely with the landowners, site promoters and the Authority to prepare outline land use masterplans for each site to guide future development on the sites, following the adoption of the ELDP. On the other hand, |
we remain concerned that the proposed policy wording above is too prescriptive and could hinder development coming forward.

There needs to be consistency throughout the plan. As such, we maintain our contention that the wording contained within paragraph 6.19 of the ELDP is more appropriate as it states:

“The Authority requires an outline masterplan to be in place before any significant new development commences on either site.”

As previously documented, this would at least allow preparatory or initial development to come forward if appropriate, rather than foreclosing all development prior to the agreement of a masterplan, whilst respecting the overall objective of preventing any inappropriate and piecemeal development.

It follows that we are also concerned about the introduction of the second proposed paragraph to the policy which states:

“The outline masterplan will need to be supported by a landscape and visual impact assessment and demonstrate how the siting, scale, design and character of the development will minimise adverse effects upon the landscape character, visual amenity, natural environment and cultural heritage of the National Park.”

Our concern stems from the fact that the introduction of this criterion could frustrate timescales for the preparation of outline masterplans as it will not be possible to prepare a Landscape Visual Impact Assessment (LVIA) without detailed proposals to assess. We would anticipate that any future planning application(s) will be supported by a LVIA. We would therefore like to suggest that the policy be amended to replace the requirement for a ‘LVIA’ with a ‘Landscape Appraisal’ which would take into account the most sensitive areas of the site and the most important visual receptors, and could inform and underpin the outline masterplan as well as any future LVIAs.

In terms of the proposed amendment to Part A of this policy, we have previously explained that we would not want overly-prescriptive design criteria to foreclose potential development proposals coming forward on either site. After all, supporting the creation of new sustainable employment opportunities, attracting private sector investment and stimulating economic growth within the National Park is the primary objective of designating this area as part of the SEZ. Our previous representations clearly set out why design should be considered proportionately, in light of the proposed policy’s requirement for a high standard of design. Design is a specific matter and will vary according to each development proposal that may come forward. We therefore object to the amendment to criterion (i) of the policy requiring the design
To also be coherent as this may simply not be possible given the uses proposed on the two SEZ sites. For example, the siting, design, scale and height of aviation and aerospace related buildings have to meet specific operational requirements. As such, the design should be appropriate to the scale, nature, location, context and proposed use of each proposal.

Fundamentally, whilst the positive allocation of both sites is welcomed as part of the SEZ, we remain genuinely concerned about the impact such design requirements will have on the commercial viability of the sites. If the proposed policy is too prescriptive and restrictive in nature, with limitations imposed on new development, this would in fact deter commercial operators from coming to the site and hinder potential investment and development, thereby impacting on economic activity and the creation of sustainable high paid job opportunities in the National Park. The commercial reality is that any overburden on design costs, restrictions on heights, limitations on scale and focus area, and matters increasing development cost will be perceived by any commercial investors and the marketplace as negatives and barriers to new development and job creation at a time when there are competing sites.

MACResp07 004 GVA - SEZ MAC 12

We also object to the introduction of criterion (vii) to the policy which stipulates that: “development on either site does not have an unacceptable impact on the dark skies reserve.” We do not consider it necessary to include such criterion within this policy as neither site falls within the three Dark Skies Reserve “Core Zones” in Snowdonia, as identified within the Supplementary Planning Guidance (SPG): Obtrusive Lighting (Light Pollution). Moreover, there are explicit policies, in the form of Development Policy 1: General Development Principles and Development Policy 2: Development and the Landscape, to ensure that any exterior lighting required in a new development will not be obtrusive and cause light pollution nuisance to neighbours, harm biodiversity and landscape interests within the Snowdonia Dark Skies Reserve, and in particular within the identified Core Areas. The SPG indicates that SNPA will simply ask people to adjust their use of light especially when changing existing outside lights or incorporating new ones as part of a new development proposal.

MACResp07 005 GVA - SEZ MAC 13

In terms of Development Policy 27, Part B, we welcome and support the change in emphasis within the first sentence of the policy which now refers to the list of uses that will be accepted within the overall Enterprise Zone Designation [our emphasis] at Llanbedr as identified on the Proposals Map.

This reflects the extent of the Snowdonia Enterprise Zone, as designated by the Welsh Government (WG).

MACResp07 006 GVA - SEZ MAC 13

In response to our previous concerns that the wording of the policy was too restrictive in terms of supporting all of the potential uses at the site, we are also pleased to see the proposed amendment to the second bullet point which now states that the followings uses will be accepted:
“new uses including employment use (B1, B2, B8) and other uses associated with research and development’.”

This minor amendment to the policy is important given the potential for small and medium-sized enterprises (SMEs) and other local non-aviation and aerospace related industries to locate to the site.

Such businesses and industries would support and enhance the employment offer at the Llanbedr Site, as well as generate significant new employment opportunities for the National Park.

The policy has also been expanded to stipulate that:

"Development proposals should be directed towards the indicative focus area. Where development is proposed outside this area, the following criteria should be met:

- detailed proposals will need to demonstrate that the proposed development incorporates appropriate and acceptable flood risk mitigation measure agreed with NRW
- there are no unacceptable significant effects on the landscape or visual amenity
- sufficient evidence has been provided that the site demonstrates the least impact upon the landscape, visual amenity, environmental and cultural heritage
- the development is not located in an area which will prevent the use of the main runway
- the development should not adversely affect the integrity of European designated sites
- sufficient evidence has been provided to justify why the development cannot be located in the indicative focus area"

We acknowledge the merit in the proposed approach of directing development proposals towards an ‘indicative focus area’ and welcome the above criteria based policy to allow development to take place outside this area.

In terms of the proposed criteria, there is a similarity between bullet points 2 and 3 listed above and we would therefore suggest that these be merged into one bullet point.

However, as things stand, we maintain our strong objection to the limited size of the indicative focus area identified on the amended Proposals Map for the Llanbedr site, included as Appendix 7.

Fundamentally, this proposed area of 12.7 hectares (31 acres) that has been identified as the ‘indicative focus area’ for
new development is simply not large enough to support and accommodate the existing aerospace industry and associated employment and ancillary uses at the site, and to assist in delivering one of the objectives of the LDP which is to provide sustainable employment opportunities for the National Park.

This proposed area is far too limiting and not only substantially restricts development but also increases the costs of development and consequently the long term sustainability of the site. Given the nature of the proposed uses on site, it is important to draw attention to the fact that it will not be possible to build new units next door to each other, as is normally the case on a traditional business park, as there will be a need to consider the safe transit of aircraft to and from the buildings.

Furthermore, these manoeuvring areas and aprons required to service any new hangars could be just as big, or even bigger, than any new unit itself; this in itself limits the density for actual new units to be built on the site which in turn impacts on economic activity, job creation and sustainability in this rural setting. Moreover, the majority of the proposed ‘indicative focus area’ falls within the 1 in 200-year plus climate change flood outline and is not compliant with TAN15 A1.14 without land raising.

Only the southern portion of this indicative focus area (extending to approximately 2.5 hectares) is located outside of this flood outline and this is certainly not sufficient in size.

It is worth reiterating the fact that, originally, an area extending to some 35 hectares (86 acres) was identified within the Deposit LDP allocation as the focus area for new development at the Llanbedr site. This has now been significantly reduced (by some 64%) to an area of approximately 12.7 hectares (31 acres). The reason given by the Authority for the change is to ensure that the allocation provides certainty as to where development will be acceptable on the site and to ensure the site is not within an area of flood risk as identified by the SFCA.

The final agreed Strategic Flood Consequences Assessment (SFCA) (Version 5.0) prepared by GVA and agreed by NRW, which formed part of the LDP evidence base, has identified two additional parcels of land to the south of the existing proposed ‘indicative focus area’, in which to accommodate proposed development at the site, thus offsetting the loss of land in the northern part of the site due to flood constraints.

The first parcel of land, extending to some 11.8 hectares, is located immediately south of the existing ‘indicative focus area’ and is entirely outside of the 1 in 200-year plus climate change (combined with a 20-year fluvial event) flood outline.
The second parcel of land, extending to some 7.2 hectares, is located around the existing Air Traffic Control Tower within the eastern portion of the airfield and is again entirely outside of the 1 in 200-year plus climate change (combined with a 20-year fluvial event) flood outline.

These two additional parcels of land extending to some 19 hectares are entirely outside the 1 in 200-year plus climate change flood outline and therefore compliant with A1.14 and A1.15 of TAN 15. could be allocated as part of the new ‘indicative focus area’ for development. Combined with the existing proposed ‘indicative focus area’ (where land raising would be required on an area of land extending to some 10.5 hectares), this would provide a total ‘indicative focus area’ of 29.6 hectares.

A plan (Reference GVA/SLP/02) identifying these two additional areas for development (as outlined in green) is shown below. [Appendix 1]

Following the discussions at the recent LDP Examination hearing sessions, and given that NRW has removed its holding objection to the proposed allocation of the land at Llanbedr Airfield, we are very surprised and disappointed that the Authority is still only referring to this single limited area proposed (extending to 12.7 hectares) and not the two additional suitable areas we had shown within the agreed SFCA, as anticipated.

If this suggested larger ‘indicative focus area’ is not adopted (as shown on the above plan, Reference: GVA/SLP/02), we maintain our contention that it is considered premature to limit the site area to anything less than the designated SEZ boundary, depicted by the red line, especially given that no masterplan is currently available for the land. In such a scenario, we would respectfully reiterate our request that the amended Proposals Map allocation for Llanbedr comprises a single redline boundary for the site rather than identify an ‘indicative focus area’ for development, especially given that no masterplan is currently available for the land. This single redline boundary sought is shown on the site plan (reference GVA/SLP/01) submitted by GVA as part of the representation, dated 30th August 2017, in response to the consultation on the Eryri Local Development Plan (LDP) Revision, Deposit Plan Consultation.

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<td>MACResp07</td>
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We object to the proposed additional wording within the second sentence of paragraph 6.19 requiring any new development to be coherent “in terms of design and layout”. The crux of the matter is that it may not be practical or viable for the proposed new development to be coherent in terms of design and layout.

Furthermore, as noted in our comments above in response to Development Policy 27, whilst we acknowledge the need for the outline masterplans to be landscape led, given the site’s sensitive location within the National Park, we are concerned
about the additional requirement for the outline masterplans to be “supported by a landscape and visual impact assessment (LVIA)” given that it may not be possible to prepare such an assessment at the outline masterplan stage without specific details to assess. In our considered opinion, it would be more appropriate for the outline masterplans to be informed by a Landscape Appraisal and paragraph 6.19 could be amended accordingly.

MACResp07 | 009 | GVA - SEZ | MAC 15
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For similar reasons, we object to the proposed addition of the words “of a high standard” to the first sentence of paragraph 6.20, i.e. it may not be practical, feasible or viable for the proposed new buildings on the site to be of a high standard of design. We have previously explained that we would not want overly-prescriptive design criteria to foreclose potential development proposals coming forward. After all, supporting the creation of new sustainable employment opportunities, attracting private sector investment and stimulating economic growth within the National Park is the primary objective of designating this area as part of the SEZ.

MACResp07 | 010 | GVA - SEZ | MAC 16
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In light of our previous representations explaining that the design, scale and height of aviation and aerospace related buildings have to meet specific operational requirements, we naturally remain concerned with the first sentence of paragraph 6.21 which has now been amended to state that “the scale of any new buildings at the Llanbedr site should relate and be proportionate to the existing buildings.” Our concern is that this may restrict some opportunities for the site from coming forward as part of the masterplan. As such, we respectfully reiterate our request that the paragraph is amended as follows to allow the detailed considerations of any future development to be guided by the outline masterplan:

“The design, height, scale and siting of aviation and aerospace related buildings at the Llanbedr Site have to meet specific operational requirements. Due to its open nature, any new buildings on the Llanbedr site should generally be restricted to be no higher than existing buildings, to ameliorate their visual impact, unless there are exceptional or operational circumstances, in which case a clear evidenced justification will be required. The detailed consideration of design, height, scale and siting of development would be guided by the outline masterplan for the site and be informed by robust technical assessment in respect of landscape and visual impact.”

MACResp07 | 011 | GVA - SEZ | MAC 17
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We support the proposed amendments to paragraph 6.23, clarifying the extent of the Snowdonia Enterprise Zone site at Trawsfynydd, which includes Llyn Trawsfynydd, as designated by the Welsh Government (WG) in 2013. The amended text supports the changes to the Proposals Map to show the Welsh Government’s Enterprise Zone designation for Trawsfynydd (as contained within Appendix 6).
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<th>012</th>
<th>GVA - SEZ</th>
<th>MAC 18</th>
<th>We support the amended wording of paragraph 6.26 as this conforms with the wording of the Welsh Government Enterprise Zone designation at Llanbedr.</th>
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| MACResp07 | 013 | GVA - SEZ | MAC 19 | In light of our comments above, regarding MAC Number 13 (relating to Part B of Development Policy 27: Snowdonia Enterprise Zone), it follows that we strongly object to the proposed amendment to the first sentence of paragraph 6.27 which states:  

“For clarity and consistency, the LDP allocation for Llanbedr shows an indicative focus area where development should be directed, the area is approximately 12.7 hectares (31 acres) and this area falls outside the area identified as flood risk...”

Our objection is twofold. Firstly, as already explained, the extent of the ‘indicative focus area’ is considered too small to support and accommodate the existing aerospace industry and associated employment and ancillary uses at the site and the new development and uses anticipated on this site in the future. Secondly, the indicative focus area does not completely fall outside the identified flood risk zone. As set out in our hearing statement, and as explained at the hearing session itself on the 18th July 2018, the majority of the proposed ‘indicative focus area’ falls within the 1 in 200-year plus climate change flood outline and is not compliant with TAN15 A1.14. Only the southern portion of the indicative focus area (extending to approximately 2.5 hectares) is located outside of this flood outline. This area of 2.5 hectares is not sufficient in size for development proposals. The hydraulic modelling undertaken as part of the Strategic Flood Consequences Assessment (SFCA) prepared by GVA, on behalf of the WG, has demonstrated that land raising is achievable on the site, if required, and will have negligible impact on third party land. It has been estimated that approximately 33,000m³ of earth would be required to raise the area of land (extending to some 10.5 hectares), as identified within the SFCA, above flood risk. NRW has confirmed in its consultation response (NRW Reference CAS-58431-B880, dated 19th April 2018) that this option is considered viable, subject to further modelling regarding this possible need for compensatory storage. However, this area of land raising is unlikely to be required within the plan period if sufficient land (as we have identified) is allocated elsewhere on the site which is flood free. |
| MACResp07 | 014 | GVA - SEZ | MAC 22 | We note the amendment to paragraph 2.5, providing examples of the kinds of development the Authority considers to be major development, including large scale renewable energy and low carbon energy schemes, together with clarification on the procedures for the determination of such major developments through the addition of a footnote stating:  

“The Planning (Wales) Act 2015 introduced a new category of planning permission for Development of National Significance
(DNS). DNS include electricity-generating projects (other than wind) of between 10 and 50MW and wind projects above 10MW, and decided by the Welsh Ministers. Projects under 10MW are decided by the local planning authorities.

However, given the SEZ’s allocation at Trawsfynydd is (in-part) due to its potential to accommodate low carbon energy generation, we maintain our contention that the 5MW ‘cap’ that has effectively been placed on renewable / low carbon energy development through emerging Development Policy 3 is not considered to be appropriate as there are various technologies that could be developed at Trawsfynydd and acceptably generate in excess of this threshold, albeit such application may ultimately be determined by Welsh Ministers.

As things stand, Development Policy 3 states that “Larger Local Authority Scale (greater than 5MW) and Strategic renewable energy schemes are generally considered to be incompatible with National Park purposes and would need to satisfy Strategic Policy B; Major Development” [our emphasis]. This policy is considered to be unjustified. While clearly it may be true in a practical sense in relation to certain technologies (such as wind or solar), each case needs to be considered on its own merits against Strategic Policy B (and Development Policy 27 if applicable) and the possibility of energy generation projects above 5MW should not be unduly prejudiced by the ELDP and its policies.

We therefore remain concerned that Development Policy 3, as it currently drafted, undermines the strategic allocation of Trawsfynydd as part of the SEZ due to the doubt this places over the acceptability of low carbon energy generation development at the site. As previously mentioned, a supportive planning policy provision is crucial in order to secure investment at the site.

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<tr>
<th>MACResp07</th>
<th>015</th>
<th>GVA - SEZ</th>
<th>MAC 23 - Appx 6</th>
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| As previously documented, in terms of consistency and accuracy, we consider that the boundary for Trawsfynydd as shown on the Proposals Map should reflect the red line plan of the Enterprise Zone as designated by the WG. We therefore support the proposed amendment to the Proposals Map, included as Appendix 6, showing the Welsh Government’s Enterprise Zone designation at Trawsfynydd in its totality and reflecting the changes made to the text within paragraph 6.23.

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| We continue to support the redline boundary for the Llanbedr site which remains unchanged, as shown on the LDP Proposals Map, and extends to 227.8 hectares (562 acres).

However, in light of our comments above regarding MAC Number 13 (relating to Part B of Development Policy 27: Snowdonia Enterprise Zone), it follows that we strongly object to the proposed amendment to the LDP Proposals Map identifying the ‘indicative focus area’ for the Llanbedr site, as shown on the Proposals Map included as Appendix 7.
In our considered opinion, the two additional proposed development areas outlined in green on the plan below (Plan Reference: GVA/SLP/02) should be identified as part of the ‘indicative focus area’ for the Llanbedr site on the Proposals Map. NRW has reviewed the final SFCA (Version 5.0) and confirmed that the two proposed ‘indicative focus areas’ identified are technically viable and compliant with A1.14 and A1.15 of TAN 15 (Discretionary Planning Advice ref CAS-54216-J2Q3). These areas generally fall outside of the extreme flood outline and the majority of this land will not require any land raising.

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<th>General</th>
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| In our considered opinion, it is imperative to ensure that there is a positive planning policy context for the SEZ within the revised ELDP in order to enable the objectives of the Enterprise Zones to be met. In summary, these are to:

- grow the local economy and provision of new jobs;
- act as a catalyst for growth elsewhere in Wales;
- improve the attractiveness of the Enterprise Zone for investors, and
- strengthen the competitiveness of the Welsh economy.

However, as things stand, we are concerned that the emerging planning policies of the ELDP Revision could hinder rather than encourage investment and development on the subject sites.

Subject to the recommended changes to the plan as detailed in our representations, SEZAB are supportive of Development Policy 27 and would welcome an amended allocation for Llanbedr within the Proposals Map accompanying the ELDP. The SEZAB look forward to working with the SNPA on the outline masterplans for both sites (Llanbedr and Trawsfynydd) going forward. The SEZ designation represents an excellent opportunity to facilitate new employment opportunities for the National Park within a variety of sectors. The sites presents a unique economic development opportunity within the National Park, with the potential to offer sustainable, value added employment opportunities to support the economy of Meirionnydd and the wider region.

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<tr>
<th>MACResp08</th>
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<th>GVA - NDA</th>
<th>MAC 12</th>
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| We acknowledge and agree with the proposed removal of the word ‘detailed’ from the first sentence of the policy and its replacement with the words ‘landscape led outline’ masterplan. A landscape led outline masterplan is considered a more appropriate and proportionate requirement given the Trawsfynydd (and Llanbedr) sites are existing developed sites within the National Park.

However, we maintain our previous objection to the proposed introductory paragraph of the amended policy: “A landscape led outline Masterplan will need to be produced for both Llanbedr and Trawsfynydd sites and agreed with the
Authority. The Masterplan will contain a development brief, a design statement, and a schedule identifying the phasing of development and associated infrastructure improvements required for each stage, before any development commences.”

As explained in our previous representations, whilst the NDA understands the Authority’s aim of having a clear strategic framework for the development of the site and, as landowners, are happy to work closely with the site promoters and the Authority to prepare an outline land use masterplan to guide future development on the site, following the adoption of the ELDP, we remain concerned that the proposed policy wording above is too prescriptive and could hinder development coming forward. We maintain our contention that the wording within paragraph 6.19 of the ELDP is more appropriate as it states:

“The Authority requires an outline masterplan to be in place before any significant new development commences on either site.”

This would allow preparatory or initial development to come forward if appropriate, rather than foreclosing all development prior to the agreement of a masterplan, whilst respecting the overall objective of preventing any inappropriate and piecemeal development.

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<tr>
<th>MACResp08 002</th>
<th>GVA - NDA</th>
<th>MAC 12</th>
<th>It follows that we are also concerned about the introduction of the second proposed paragraph to the policy which states:</th>
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<td>“The outline masterplan will need to be supported by a landscape and visual impact assessment and demonstrate how the siting, scale, design and character of the development will minimise adverse effects upon the landscape character, visual amenity, natural environment and cultural heritage of the National Park.”</td>
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Our concern stems from the fact that the introduction of this criterion could frustrate timescales for the preparation of an outline masterplan as it will not be possible to prepare a Landscape Visual Impact Assessment (LVIA) without detailed proposals to assess. We would anticipate that any future planning application(s) will be supported by a LVIA. We would therefore like to suggest that the policy be amended to replace the requirement for a ‘LVIA’ with a ‘Landscape Appraisal’ which would take into account the most sensitive areas of the site and the most important visual receptors, and could inform and underpin the outline masterplan as well as any future LVIA.

| MACResp08 003 | GVA - NDA | MAC 12 | We have previously explained that we would not want overly-prescriptive design criteria to foreclose potential development proposals coming forward. After all, supporting the creation of new sustainable employment opportunities, |
attracting private sector investment and stimulating economic growth within the National Park is the primary objective of designating this area as part of the SEZ.

Our previous representations clearly set out why design should be considered proportionately, in light of the proposed policy’s requirement for a high standard of design. We therefore object to the amendment to criterion (i) of the policy requiring the design to also be coherent as this may simply not be possible given the uses proposed.

| MACResp08  | 004 | GVA - NDA | MAC 12 | We also object to the introduction of criterion (vii) to the policy which stipulates that: “development on either site does not have an unacceptable impact on the dark skies reserve.” We do not consider it necessary to include such criterion within this policy as neither site falls within the three Dark Skies Reserve “Core Zones” in Snowdonia, as identified within the Supplementary Planning Guidance (SPG): Obtrusive Lighting (Light Pollution). Moreover, there are explicit policies, in the form of Development Policy 1: General Development Principles and Development Policy 2: Development and the Landscape, to ensure that any exterior lighting required in a new development will not be obtrusive and cause light pollution nuisance to neighbours, harm biodiversity and landscape interests within the Snowdonia Dark Skies Reserve, and in particular within the identified Core Areas. The SPG indicates that SNPA will simply ask people to adjust their use of light especially when changing existing outside lights or incorporating new ones as part of a new development proposal. |
| MACResp08  | 005 | GVA - NDA | MAC 14 | We object to the proposed additional wording within the second sentence of paragraph 6.19 requiring any new development to be coherent “in terms of design and layout”. The crux of the matter is that it may not be practical or viable for the proposed new development to be coherent in terms of design and layout.

Furthermore, as noted in our comments above in response to Development Policy 27, whilst we acknowledge the need for the outline masterplan to be landscape led, given the site’s sensitive location within the National Park, we are concerned about the additional requirement for the outline masterplan to be “supported by a landscape and visual impact assessment (LVIA)” given that it may not be possible to prepare such an assessment at the outline masterplan stage without specific details to assess. In our considered opinion, it would be more appropriate for the outline masterplan to be informed by a Landscape Appraisal and paragraph 6.19 could be amended accordingly. |
| MACResp08  | 006 | GVA - NDA | MAC 15 | For similar reasons, we object to the proposed addition of the words “of a high standard” to the first sentence of paragraph 6.20, i.e. it may not be practical feasible for the proposed new buildings on the site to be of a high standard of design. We have previously explained that we would not want overly-prescriptive design criteria to foreclose potential development proposals coming forward. |
After all, supporting the creation of new sustainable employment opportunities, attracting private sector investment and stimulating economic growth within the National Park is the primary objective of designating this area as part of the SEZ.

In light of our previous representations, and as stated within paragraph 6.23, the lake presents an integral part of the opportunity provided at the Trawsfynydd site. As such, we support the proposed amendments to paragraph 6.23, clarifying the extent of the Snowdonia Enterprise Zone site at Trawsfynydd, which includes Llyn Trawsfynydd, as designated by the Welsh Government (WG) in 2013. The amended text supports the changes to the Proposals Map to show the Welsh Government’s Enterprise Zone designation for Trawsfynydd (as contained within Appendix 6).

We note the amendment to paragraph 2.5, providing examples of the kinds of development the Authority considers to be major development, including large scale renewable energy and low carbon energy schemes, together with clarification on the procedures for the determination of such major developments through the addition of a footnote stating:

“The Planning (Wales) Act 2015 introduced a new category of planning permission for Development of National Significance (DNS). DNS include electricity-generating projects (other than wind) of between 10 and 50MW and wind projects above 10MW, and decided by the Welsh Ministers. Projects under 10MW are decided by the local planning authorities.”

However, given the SEZ’s allocation at Trawsfynydd is (in-part) due to its potential to accommodate low carbon energy generation, we maintain our contention that the 5MW ‘cap’ that has effectively been placed on renewable / low carbon energy development through emerging Development Policy 3 is not considered to be appropriate as there are various technologies that could be developed at Trawsfynydd and acceptably generate in excess of this threshold, albeit such application may ultimately be determined by Welsh Ministers.

As things stand, Development Policy 3 states that “Larger Local Authority Scale (greater than 5MW) and Strategic renewable energy schemes are generally considered to be incompatible with National Park purposes and would need to satisfy Strategic Policy B; Major Development” [our emphasis]. This policy is considered to be unjustified. While clearly it may be true in a practical sense in relation to certain technologies (such as wind or solar), each case needs to be considered on its own merits against Strategic Policy B (and Development Policy 27 if applicable) and the possibility of energy generation projects above 5MW should not be unduly prejudiced by the ELDP and its policies.

We therefore remain concerned that Development Policy 3, as it currently drafted, undermines the strategic allocation of Trawsfynydd as part of the SEZ due to the doubt this places over the acceptability of low carbon energy generation.
development at the site. As previously mentioned, a supportive planning policy provision is crucial in order to secure investment at the site.

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<tr>
<th>MACResp08</th>
<th>009</th>
<th>GVA - NDA</th>
<th>MAC 23</th>
<th>As set out in our previous representations to both the Deposit Plan and Focussed Changes consultation, in terms of consistency and accuracy, we consider that the boundary for Trawsfynydd as shown on the Proposals Map should reflect the red line plan of the Enterprise Zone as designated by the WG. We therefore support the proposed amendment to the Proposals Map, included as Appendix 6, showing the Welsh Government’s Enterprise Zone designation at Trawsfynydd in its totality and reflecting the changes made to the text within paragraph 6.23.</th>
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<td>010</td>
<td>GVA - NDA</td>
<td>General</td>
<td>In summary, we continue to support the overall positive planning policy context provided within the emerging revised ELDP for existing and future development at the Trawsfynydd site. Importantly, the ELDP (specifically Development Policy 27) supports works and uses associated with nuclear decommissioning (which will continue throughout the plan period) as well as suitable alternative uses. Given the flexibility of the policy, decommissioning and new development can be achieved simultaneously, facilitated by the on-going engagement between the Welsh Government, NDA, Magnox and other stakeholders. However, there are a number of key issues that continue to cause concern. The Snowdonia Enterprise Zone (SEZ) designation for Trawsfynydd represents an excellent opportunity to facilitate new employment opportunities for the National Park within a variety of sectors. This will contribute to compensating the loss of employment opportunities that will occur as the existing power station site is decommissioned. Therefore, in our considered opinion, securing a positive planning policy context for the subject site within the revised ELDP is crucial in order to attract private sector investment and support new businesses.</td>
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<td>MACResp09</td>
<td>001</td>
<td>Evan Owen</td>
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<td>We are all wondering how this plan can be made sound unless the existing housing shortfall and the projected need are included in your housing figures or even in a worst-case scenario increased to 66% of the true need and it is spread out to areas that have the existing infrastructure and public transport systems. Under the Environment Act 1995 every public body member and employee has a duty to seek to foster the social and economic well-being of the communities, this includes Community Councils, this National Park Authority, the constituent local authorities and the welsh Government, and of course its executive agencies.</td>
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<td>MACResp09</td>
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<td>Evan Owen</td>
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<td>The lack of adequate consultation with landowners and communities is just as bad as, if not worse than, it was during the process of producing the current LDP but now we also have the Well-being of Future Generations (Wales) Act 2015 which places duties on National Park Authorities, the constituent authorities and the Welsh Government to work together better, involve people reflecting the diversity of our communities, look to the long term as well as focusing on now, take</td>
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action to try and stop problems getting worse - or even stop them happening in the first place. I see none of the SEVEN well-being goals of the Act being considered in these proposals. Your settlement hierarchy discriminates against large communities that were split into artificial settlements and strangles smaller communities in favour of towns where nobody wants to live because they are not in sustainable locations, this places them at risk from loss of the Welsh language, the culture and the skills that keep these landscapes alive. The current and future well-being of the communities is in grave peril, they will become dormitories for the elite who can afford to pay the inflated prices created by the kudos of having a property in a ‘National Park’.

| MACResp10 001 Adult Learning Wales | First I note that there is a proposal not to extend the settlement boundary within the established middle road at Harlech which would exclude consideration being given to the candidate site we proposed for low scale sensitive development namely reference ADSAF041. As part of the discussion around the affordability provision on the other site submitted 31/06 there was a suggestion that a decision to consider some form of sensitive low density development on the site ADSAF041 would enable consideration for a higher level of affordable allocation on the other site to be discussed.

Whilst my clients recognise and welcome the confirmation of the main high street within Harlech we remain of the view that an alteration on the settlement boundary at this level would strengthen the retail offer by access to an enhanced spend. |

| MACResp10 002 Adult Learning Wales | On the other site 31/6 we welcome the inclusion of part of the proposed site within the proposed local plan but are concerned that the site shape of the proposed allocation does not provide the best layout options for the land and an enhancement of the land allocation in this area would lead to a better development in term of the layout and its impact on the landscape. |
Llanbedr
Revised Development Locations
14/12/2017

Plan Reference: GVA/SLP/02