



Snowdonia National Park Authority Eryri Local Development Plan Revision Review Report *July 2016*



Review Process

1. A full review of the Eryri Local Development Plan (LDP) is required every four years from the time of adoption. The Plan was adopted in July 2011 therefore it is now timely to undertake the review. Its purpose is to identify whether the Plan remains up to date and if not, what revisions are required and why to take account of changed national and local circumstances. It may also be the case that the Plan has not performed well against the target indicators set out in the original monitoring framework.
2. This Review Report is the beginning of the review process and seeks to outline;
 - What issues have been considered as part of the review?
 - Stemming from the review, what revisions are required to the Plan and why, based on the evidence examined?
 - The implications, if any, of the anticipated revisions on parts of the plan not changing?
 - The form of revision required – either to follow a full or short form revision procedure based on the changes that are required? A short form revision will involve a light touch revision where not many changes are required because the Plan remains sound for future use. A full revision involves wholesale changes to the Plan required because significant issues needing change have been highlighted – such changes will lead to a replacement plan.

Views of Stakeholders

3. To inform the review process the Authority prepared a discussion paper to obtain the views of key stakeholders on the issues identified, what should be considered in the review and the kind of changes that should be made to the Eryri LDP as well as the form of revision proposed. A full list of the key stakeholder engaged on the discussion paper to inform the Review Report is included at Appendix 1.
4. Snowdonia National Park Authority values the close relationship it has with the areas Community Councils and this relationship has been central to the development of policies within the adopted Eryri LDP. During May 2014, Community Council events were organised at three locations throughout the National Park to provide an update on the Authority's work and on the Eryri LDP review process to gain Community Council input on which areas/policies they would like to change. The Authority also invited Community Councils to comment on the discussion paper and the responses received have been included in Appendix 2.
5. Potential changes to the Eryri LDP were also discussed with the Authority's planning agents at the annual Planning Agents meeting on the 28th January 2016. Planning agents were invited to submit informal comments on possible changes to the Eryri LDP identified by the Authority and to suggest other

areas of the Plan which, in their opinion needed to be changed. The comments received by agents have also been included in appendix 2.

6. Having considered Stakeholders views, they were generally in agreement with the Authority on the issues considered as part of the review process and what needs to change and why. None of the stakeholders identified the need for any changes to the existing Eryri LDP strategy and there was consensus that the short form revision process is the most appropriate method of moving forward. Stakeholders highlighted the need to consider the potential impact of the designation of Snowdonia Enterprise Zone and the need to review the main housing policies to ensure that they are assisting with bringing development forward. The Authority has already noted that it will continue to consider the impact of the enterprise zone designation as plan revision progresses as well as gathering further evidence on viability and deliverability to enable the Authority to consider revising the main housing policies to ensure that they are assisting with delivering the numbers of market and local affordable needs housing required. Further information on key stakeholder views and the response of the Authority is included in Appendix 2.

Background Papers

7. The Authority has updated some of the original Background Papers that were prepared as part of the evidence base for the Eryri LDP. A list of Background Papers prepared by the Authority as evidence to support the statements in this report together with other evidence documents is included in Appendix 3. These are available to view on the Authority's web site. Other Background Papers prepared for the original Eryri LDP remain relevant but are not critical for this Review Report. In due course, as the revision process proceeds, they will be updated and amended as required. This report also highlights the need to obtain further information which will be gathered as the revision process progresses. Additional evidence will be gathered, if deemed necessary, to justify the changes proposed. In itself, this Review Report will form part of the background evidence when the Eryri LDP, as revised, is submitted for Public Examination.

What has been Considered

8. The most logical place to start a review is to investigate the performance of the Eryri LDP Annual Monitoring Reports (AMRs)¹. Since adoption in 2011

¹ Eryri LDP Annual Monitoring Report 2011-12(informal), Eryri LDP Annual Monitoring Report 2012-13, Eryri LDP Annual Monitoring Report 2013-14, Eryri LDP Annual Monitoring Report 2014-15.

three formal AMR's have been produced and one informal report based on the partial first year of adoption. The AMRs have measured the performance of the Plan against an agreed set of indicators with specific targets. National or external planning factors have also been identified and their potential impact analysed, as well as any other relevant local changes falling outside the normal monitoring process. The AMR analysis follows the chapter layout of the Eryri LDP and at the end of each chapter there is a short commentary on the likely implications for a Plan review. It is considered that the monitoring undertaken to date is beginning to show a trend and the following general conclusions can now be drawn.

- The existing strategy continues to be the correct approach and can be rolled forward for an extended time period - the emphasis on maintaining the viability and vibrancy of local communities in a sustainable way remains appropriate to the National Park. Rolling forward the time period for the Plan will require the identification of additional land in line with the existing spatial strategy.
- There have been no significant developments permitted which undermine the statutory purposes of the National Park or the strategic policies of the Plan. The Eryri LDP policies have been effective in determining land use planning applications and in defending appeals.
- The Plan has a more than adequate supply of housing land (8.3 years Joint Housing Land Availability Study 2014. In the 2015 study the supply was 7 years).
- The total number of affordable dwellings completed has broadly met the target.
- The scale of new development within Snowdonia is relatively small and as a result one unanticipated development on a windfall site or a large site completed within one year can yield results which exceed the % target for a given settlement tier e.g. no permissions granted in Bala and Dolgellau and a permission on a windfall site in Harlech during 2014-15 has distorted the target figures for the settlement tiers in favour of Service Settlements. However the spatial development strategy is being achieved with permissions and completions in accordance with the plan's spatial development policy and is mainly in line with the targets set since adoption in 2011. It is not considered that a higher rate of development would not be desirable in the National Park and would be difficult to practically deliver.
- The designation of the Snowdonia Enterprise Zone on sites in Trawsfynydd and Llanbedr has the potential to create new sustainable employment opportunities. As the sites are not formally allocated in the Eryri LDP they will need to be identified in a revised Plan and a new policy prepared to regulate new development.

- 64 Hydro Electric Schemes have been permitted in Snowdonia since the Eryri Local Development Plan was adopted with most of these being agricultural diversification schemes creating extra income on farms.
 - No applications have been received to develop new employment sites. However, new employment opportunities have been created through agricultural diversification schemes, converting existing rural buildings to short term holiday accommodation or other tourism related projects, creating direct or indirect jobs. The Authority has also supported new proposals on the edge of the National Park such as Surf Snowdonia in Dolgarrog which will bring new employment opportunities to the area.
 - There has been no or little development of significance to impact on other policies in the Plan.
 - Most of the policies in the Plan have been used and there is no evidence of a policy vacuum.
9. To obtain a more detailed picture of possible changes required each chapter of the Eryri LDP is now discussed in turn to indicate in more detail what has been considered and what possible revisions may be required.

Influences on the Spatial Strategy

10. The purposes of the National Park have remained the same although at the time of writing the report on National Landscapes: Realising their Potential² has recommended to the Welsh Government amending the purposes and adding a third to support sustainable economic development. It is not considered that the changes proposed would fundamentally change the Eryri LDP but would further support the existing vision and objectives. The Government has yet to formally respond to the report, although further work is ongoing, therefore it is not possible, in advance, to second guess when or if the new purposes will be statutorily adopted before the Eryri LDP is revised.
11. Changes in national legislation, such as the Planning (Wales) Act 2015, Well-being of Future Generations (Wales) Act 2015, Environment (Wales) Act 2016 and the Historic Environment (Wales) Act 2016 has reinforced many objectives already in the Plan such as support for local cultural vibrancy and support for the Welsh language. The Environment (Wales) Act 2016 includes the requirement for Natural Resources Wales to produce Area Statements which will cover the opportunities, challenges and national priorities for the management of natural resources at a local level. If these Area Statements are produced in time for the revision of the LDP then consideration will need to be given to their content.

² National Landscapes: Realising their Potential – The Review of Designated Landscapes in Wales July 2015

12. The National Development Framework (NDF) which will be the national land-use development plan that sets out the Welsh Government's social, economic and environmental spatial planning objectives for the next 20 years is yet to be prepared. The Wales Spatial Plan (which has informed the Eryri LDP Development Strategy) will remain applicable until the National Development Framework is adopted.
13. The Single Integrated Plan for Anglesey and Gwynedd 2013-17 has three main outcomes or priorities. They are Prosperous Communities, Healthy Communities and Safe Communities. The Eryri LDP supports the aims and objectives of this plan and is not in conflict. The Conwy Single Integrated Plan has similar priorities which are also supported by the Eryri LDP.
14. The National Park Management Plan is being reviewed concurrently with the Eryri LDP. It is not considered that wholesale changes are required to the Management Plan apart from updating the actions and rolling others forward. The "special qualities" and "vision" of the Park are common to both plans and will remain unchanged.
15. Since the adoption of the Eryri LDP, Conwy has adopted an LDP and Gwynedd and Ynys Mon have submitted their LDP for Examination. . The National Park has taken into account the allocations and policies of both plans to gauge their influence within the National Park. Of particular importance is the impact of development on the border with the National Park in key settlements such as Llanrwst, Llanberis and Porthmadog. When preparing the Eryri LDP, the Authority identified eight 'Zones of Influence' within and straddling the National Park boundary. The zones of influence had similar characteristics and strong community links. Key centres within and outside the National Park were also identified within each zone of influence and inform the Spatial Development Strategy. Key transport routes, key employment areas, further education opportunities and key services for each zone were also identified. As part of this Eryri LDP review, the Authority has revisited the Zones of Influence Background Paper and believes that the zones of influence, key centre and community links remain relevant and do not foresee any significant changes that would influence the Eryri LDP strategy. The Background Paper will need to be updated as part of the evidence base for the Eryri LDP revision to ensure all the data is up-to-date.

Key Issues, Challenges and Drivers of Change

16. The key issues identified in the existing plan are;
 - The Natural Environment
 - The Cultural and Historic Environment
 - Healthy and Sustainable Communities
 - The Rural Economy
 - Accessibility and Inclusion

17. All these issues remain relevant and can be carried forward in the revision unchanged.

Spatial Vision and Objectives

18. The existing vision for the Eryri LDP is projected to 2035 which is likely to be beyond the end date of a revised Eryri LDP. It remains relevant and strikes the right balance between protecting the environment, engaging communities and encouraging economic prosperity based on natural resources. The emphasis on adapting to climate change and seeking to create a low carbon economy is possibly now more pressing than ever. Evidence from the AMRs also indicates that jobs are being created through adventure activities based on the natural environment either within or on the fringes of the National Park. The report prepared by Arup in 2013 also highlights the economic value of the National Parks in Wales³. From the vision a series of 16 objectives have been formulated. All remain relevant and therefore will be retained in their present form.

The Development Strategy

19. The development strategy is based on the Local Planning Authority's designation as a National Park and the need to have a degree and scale of change which is compatible to this. The degree of change is also influenced by the capacity of the area to change both culturally and environmentally. The pace of change is relatively slow and there is no vibrant market for housing or economic growth. Most of the best employment opportunities have been from adventure tourism and this is likely to continue with more emphasis placed on health and well-being issues. The designation of the Snowdonia Enterprise Zone and its allocation in the Eryri LDP will create further employment opportunities. The jobs created will re-instate those gradually lost from the previous activities on the sites and is unlikely to impact on the scale and location of future housing growth and therefore unlikely to have an impact on the existing Strategy.
20. The spatial development strategy is based on seeking to provide some development, albeit small scale, to all 74 settlements in the Park. The two largest settlements, Dolgellau and Bala have respective populations of around 2400 and 1950. There are 5 service settlements and 39 secondary settlements which are fairly evenly dispersed throughout the plan area. It is therefore important to realise that settlements are small and dispersed supporting a total population of only 25,700 people.
21. The accessibility and affordability of housing is an essential factor in securing the long term viability of Snowdonia National Park's rural communities. The attractiveness of the area and the quality of life and landscape offered does put pressure on the local housing market. In addition, the capacity of

³ Valuing Wales' National Parks. Arup 2013

Snowdonia's settlements to absorb more housing developments is severely constrained due to landscape and physical reasons. Due to the nature of the terrain and other constraints such as flood risk and wildlife designations development proposals have to be carefully considered to ensure they do not conflict with National Park purposes. In view of the fact that opportunities for providing housing in the National Park without damaging its environmental qualities are diminishing, it is essential that newly built housing continues to be justified by need rather than demand.

22. Within National Park communities there are strong social and family ties generating a strong commitment to continue living within the home community. The emphasis has therefore been on a modest scale of new housing based mainly on affordable local need. Concentration of new development in a few places or seeking a higher rate of housing growth is thought undesirable and would not benefit the many dispersed communities throughout the National Park. In the two largest towns of Bala and Dolgellau there are environmental constraints of flood risk and steep topography which prohibits the orderly expansion of these settlements. Further information regarding the capacity of settlements and the severe environmental constraints within the local service centres and service settlements either because of flood risk, environmental designations or topography is included in the Housing Background paper and in the Settlement Capacity Study. The spatial distribution of housing and the scale of new development will therefore remain largely unchanged. However new housing will be required to cater for a plan period extending beyond 2022 and to provide greater choice and flexibility of sites to ensure a sustained delivery of new housing.

Protecting, Enhancing and Managing the Natural Environment

23. Since adopting the Eryri LDP, the Authority has prepared supplementary planning guidance on Landscape Character Areas and further guidance on landscape sensitivity and capacity is currently out for public consultation. This additional guidance has reinforced existing policies and has identified the most sensitive and vulnerable landscapes. The findings of the Landscapes Sensitivity and Capacity Study will provide guidance on the sensitivity of the landscapes of the Snowdonia National Park to certain development types and its capacity limits to inform policy revisions. As with other planning guidance, there will be a need to cross-reference these documents in the body of the Eryri LDP and in some existing policies. The Authority has also considered additional information on mineral safeguarding and will need to revise the Minerals Safeguarding Areas on the Proposals Map to reflect the British Geological Survey Category 1 resources in Snowdonia.
24. As evidenced by the Annual Monitoring Report a large number of small-scale Hydro Electric Schemes have been permitted in Snowdonia since the Eryri Local Development Plan was adopted with most of these being agricultural diversification schemes creating extra income on farms. There is no potential for large-scale windfarms, the evidence for this is provided by the Isle of

Anglesey, Gwynedd & Snowdonia National Park Landscape Sensitivity and Capacity Assessment undertaken by the Gillespies in 2014. The assessment found that in the National Park the landscape ranges from Moderate/High to Very High sensitivity to wind turbine developments larger than domestic scale. Therefore no allocations/areas of search for wind energy developments will be made in the ELDP Review. The Welsh Government's "Planning for renewable and low carbon energy – a toolkit for planners" considers that there is no potential, for the purposes of the assessment, for wind developments in Areas of Outstanding Natural Beauty. Since in National Parks and AONBS have equivalent status, in terms of planning, no such potential can be said to exist in Snowdonia. The Toolkit also considers that there is no potential for solar farms in AONBs, it is considered that this should also apply to National Parks. Therefore no spatial allocations are considered necessary for these technologies in the revision to the Eryri LDP. It is considered that continuing with a criteria based policy on small scale renewable energy developments, judging each application on its merits, remains the best option.

25. A further recent change has been the designation of the whole of Snowdonia as a Dark Sky reserve in recognition of the limited light pollution found in the more remote areas of the National Park. Although there are existing policies dealing with light pollution the Dark Sky status will need to be referenced in the Plan and the "core" areas identified on the proposals map.
26. A review of the Areas of Natural Beauty which the Authority thinks are particularly important to conserve will be undertaken and should any changes arise they will need to be reflected on the proposals maps.
27. To inform the revision of the Eryri LDP an Open Space assessment in line with the requirements of TAN 16 will be undertaken. This will help to inform the open space requirements within and around existing settlements to ensure that the Open Spaces which provide an important community function and local amenity are protected.

Protecting and Enhancing the Cultural and Historic Environment

28. The Historic Environment Act (2016) has now been passed and the Act and its purpose is to offer more effective protection to listed buildings and scheduled monuments, enhance existing mechanisms for the sustainable management of the historic environment and introduce greater transparency and accountability into decisions taken on the historic environment. The LDP contains a policy which protects all aspects of the historic environment therefore it is considered that there are no significant changes required to the Eryri LDP as a result of the Historic Environment (Wales) Act 2016. Consideration will need to be given to the status of the candidate World Heritage Site - 'The Slate Industry of North Wales'. Protection may need to be given to the sites which are within the National Park on the tentative list of future World Heritage nominations with UNESCO.

Promoting Healthy and Sustainable Communities

29. The time period of the Eryri LDP will need to be rolled forward beyond the existing end date of 2022 to allow for at least 10 years of operational life after adoption. Local Development Plans need to be 15 year plans and therefore with a start date of 2016 the plan will extend to 2031. . Consideration in the review therefore needs to be given to ensuring an adequate supply of housing sites for an extended local development plan period. This will involve a new call for additional housing sites.
30. The overall number of housing completions in the Eryri LDP has remained relatively constant and the average since 2007 has been 54 units compared to a plan forecast completion rate of between 51-55 units per annum. The number of affordable housing completions has also been in line with the target completion rate of 26 units although this number is likely to decrease if further public sites are not found. It should be recognised that delivering on some of the housing targets has not been easy and has involved close collaboration between partners including rural housing enablers, housing associations, local housing authorities, community councils, landowners, planning agents and private developers. It is vital that the Authority continues to work closely with partners and consider possible new local initiatives such as community land trusts to bring forward new sites in the future.
31. The overall housing requirement for an extended plan period will be assessed in some detail based on the 2013 based household projections for the National Parks and the findings of the Local Housing Market Assessments, together with other key issues such as what the plan is seeking to achieve, Welsh language considerations and the deliverability of the plan (updated Housing Background Paper). Consideration will need to be given to how the housing requirement can be met through the allocation of new sites, amendments to housing development boundaries and the contribution from windfall sites. Another important piece of work will be to update the Authority's housing viability assessment which may influence potential alterations to the housing policies and associated text to ensure they are capable of delivering the numbers of market and local affordable needs housing required. The Authority will also consider the need to revise its affordable housing policy in light of possible new local initiatives to bring forward sites. Any rolling forward of the Plan time period will also require new sites for both market and affordable housing.
32. As the existing housing forecast completion rate is sustainable and deliverable and takes account of the capacity of the area and that the number of households in the Snowdonia National Park area is projected to decrease (according to the latest 2013 based household projections) along with the need to try and ensure that the limited opportunities for development in the Park satisfy local needs and consider the needs and interests of the Welsh language it is considered that the existing housing requirement should remain at similar levels.

33. The broad distribution of growth has again been assessed based on the evidence in the AMRs. The target is 28% in the Local Service Centres, 11% in the Service Settlements, 45% in the Secondary Settlements and 11% outside housing development boundaries has broadly been attained and to meet the overall strategy of the plan there is a need to distribute housing opportunities throughout the plan area. The distribution of new housing development to date has broadly conformed to these percentage distribution targets and it is envisaged that new housing sites and windfalls will only have a small impact on the distribution of housing development in the settlement hierarchy.
34. The 2011 census has again revealed a steady decline in the number of Welsh speakers and a future profile of an ageing population. The Planning Wales Act 2015 introduces legislative provision for the Welsh language in the planning system. The Act also states the Welsh language is a material planning consideration whilst determining planning applications. Although there will be a need to update references to the Planning Act and to take greater account of Welsh language impacts in the Sustainability Appraisal, the existing policies have been framed to protect and enhance the distinctiveness of the local culture.

Supporting a Sustainable Rural Economy

35. The National Park has a duty to 'seek to foster the economic and social well-being of local communities within the National Park. In many ways the remit of the National Park in pursuing the economic and social well-being of communities alongside environmental management is a concept that fits well with the approach to sustainable development. The environment underpins much of the economy in the National Park with a number of sectors and businesses dependent on the environment.
36. Environmental protection and economic wellbeing are often seen as conflicting aims. However, there is increasing focus on the complementary relationship between conservation and economic wellbeing and the recognition that the quality of the environment is a source of competitive advantage through the opportunities it affords in sustainable tourism, food and agriculture, environmental management and energy. The economic benefits of the National Park for these sectors also extend well beyond the boundaries of the Park.
37. On average, businesses in the National Park (measured by number of employees) tend to be smaller than the rest of Wales. This reflects the relative lack of large manufacturing plants or office based services as well as the fact that tourism, retail and agricultural businesses tend to be small. There also a tendency for higher level of self-employment which reflects the types of employment sectors in the National Park.
38. Most new employment opportunities in the Park are related to the tourism industry and more recently to outdoor adventure tourism. Existing policies in the plan are very flexible in allowing new opportunities for farm diversification projects and Policy 19 is an enabling policy which is flexible on the location of

new employment sites which can either be within or adjacent to housing settlement boundaries. As part of the Eryri LDP revision the Authority will need to re-consider the criteria in Development Policy 19 to ensure it continues to promote and enable employment opportunities to ensure a strong rural economy within the National Park area. As part of this revision the Authority will also consider a policy which safeguards existing employment sites.

39. Since the Eryri LDP was adopted the Snowdonia Enterprise Zone has been designated. The zone consists of two sites – one at Trawsfynydd Power Station and the other at Llanbedr Airfield which aim to create further employment opportunities in the area. The Snowdonia Enterprise Zone offers the opportunity for sustainable and secure green energy. The potential of the zone is based on the benefits to technology businesses of a resilient local renewable power supply based on the natural resources of the area. The aim for the Trawsfynydd site is to become a hub for innovative low carbon technology enterprises and associated research & development uses building on the skills of the Trawsfynydd workforce. It is hoped that the Llanbedr site will also allow for the development of key engineering skills.
40. The Authority has worked in close co-operation with the Enterprise Board and the Welsh Government in identifying the development opportunities for the Snowdonia Enterprise Zone. The sites are not currently allocated in the Eryri LDP, therefore they will need to be shown as allocations in the revised plan. Both sites cover a large area but only part will be suitable for development.
41. With regards to the Trawsfynydd site, the jobs created in the de-commissioning of the Trawsfynydd Nuclear Power Station Site have been roughly equivalent to the numbers employed whilst the site was operational (approximately 500 people). Further de-commissioning work to reduce the height of the reactor buildings will maintain around 400 jobs until the work is expected to be completed in 2021. It is unlikely that the number of new jobs created in the Trawsfynydd Enterprise Zone site will replace the current 400. As a consequence, it is envisaged, there will be no major impact on the Plan's strategy or further implications on housing and in-migration levels.
42. In the case of the Llanbedr Airfield site, a Development Masterplan has been produced which identifies new development areas. The current operators of the site foresee the potential for further development of testing unmanned air systems and invested in the facilities at the site to cater for this expansion. This will allow modest employment growth at the site. Many of the technical jobs required for testing will be temporary in nature and restricted to testing periods. There is some potential for complimentary employment growth based on the aerospace industry and this would require substantial investment in competition with other similar sites in the UK. It is not thought that the potential scale of employment opportunities de-rail the existing Plan's strategy or lead to an increase in in-migration and housing demand. As is the case with the Trawsfynydd site the jobs created will re-instate those gradually lost

from the previous activities on the site and is unlikely to impact on the scale and location of future housing growth and therefore unlikely to have an impact on the existing Strategy.

43. Any new developments within the Enterprise Zone should take advantage of the unique selling point of being located within the attractive setting of the National Park. New projects should be innovative and provide complimentary design solutions suitable for a National Park setting. There is a chance to create new skilled employment opportunities for young people in the area. A new positive and enabling policy will be required to guide new development within the Enterprise Zone based on agreeing more specific development briefs with developers and operators.
44. Visitor accommodation requirements have changed since the adoption of the Eryri LDP with the increase in 'alternative types' of holiday accommodation. In recent years there has been an increase in the number of enquiries relating to these new types of accommodation such as yurts and pods and the existing policies relating to static and touring caravans will need to be assessed to ascertain whether they are sufficiently flexible to consider new types of accommodation. Within this context clarification of other related tourism policies will be required.
45. There have also been a significant number of applications for the conversion of rural buildings into self catering holiday accommodation since the adoption of the Eryri LDP. The purpose of this policy is to provide economic benefits to the local rural economy, (as the short term holiday accommodation is to be run as a business) and not to provide second homes within the National Park area. These rural buildings also have an important role in providing affordable local needs housing. The wording of this policy will be revisited in order to ensure that the true intention of the policy can be delivered.
46. At present new or extended tourism related projects which rely on existing facilities or a particular unique location factors can be located in the countryside where all the criteria of DP 21 are met. DP 21 and SPI will be revisited to ensure that there is greater clarity with regards to new build holiday accommodation and new build tourist attraction.
47. Evidence from retail surveys has shown that vacancy rates are increasing and that alternative uses may be desirable for vacant premises in the Service Centres and Service Settlements. A more flexibility policy approach will therefore be required.

Promoting Accessibility and Inclusion

48. Road accessibility has improved along the A470 corridor to the south of the National Park and further improvements are planned with a new Dyfi bridge.

More localised improvements have occurred with the re-building of Pont Briwet over the Dwyryd Estuary. The new proposed by-pass at Llanbedr will improve access to the Enterprise Zone site in Llanbedr and communications along the A496 which is a busy tourism route.

Consideration of Joint Plans

49. The Authority has considered the opportunity of working with adjoining authorities to prepare a joint revised or replacement plan. Gwynedd Council have yet to adopt a Local Development Plan and are unlikely to do so until 2017. The timing is therefore not compatible with the Eryri LDP revision. The other potential partner would be Conwy Council who have an adopted plan and will commence a review in 2017. The Conwy LDP is likely to be a replacement plan and the urban areas of Conwy are totally different in character to the National Park. It is therefore not considered that preparing a joint plan would be beneficial in terms of efficient timing or relevant to the purposes of the National Park. This does not preclude working jointly, where the opportunity arises, on gathering evidence and basing policies on this information.

Changes Required in a Revised Plan

50. Further to the issues discussed above it is considered that the following key revisions are required to the plan.

- To roll forward the end date of the Eryri LDP to 2031 with a start date of 2016
- Decide on a new plan housing requirement and how this can be met through the allocation of new sites, amendments to housing development boundaries and the contribution from windfall sites. This is likely to have a small impact on the distribution of housing development in the settlement hierarchy.
- Amend housing policies as required along with associated text.
- Cross reference existing policies and text with Supplementary Planning Guidance prepared since adoption.
- Consider the implications of any policies and proposals with a spatial component and update proposals map accordingly.
- Show the designation of the Snowdonia Enterprise Zone on the Proposals Map and introduce a new positive and enabling policy to manage new development within the Zone.
- Review policies dealing with types of tourism accommodation and related contextual policies.
- Amend retail policy to provide more flexibility on alternative uses.
- Recognise the designation of the Dark Sky Reserve
- Other minor update changes or minor consequential changes to policies and supporting text.

Reconsideration of the Sustainability Appraisal

51. As part of the review of the Eryri LDP the original Sustainability Appraisal (SA) has been reconsidered. The outcomes of the development proposals permitted since adoption and other evidence base information have been assessed against the Sustainability Appraisal framework in the Annual Monitoring Reports to ensure that the Local Development Plan is delivering the SA objectives. The annual monitoring reports have concluded that the LDP is delivering in terms of sustainable development in line with the SA objectives. The Authority has also reviewed the SA scoping and assessment framework of the existing Eryri LDP which included a refresh of Plans, Policies and Programmes and baseline information. It is considered that the SA objectives all remain relevant to the Local Development Plan and no changes are considered necessary. The SA framework which has been used throughout as a tool for assessing the sustainability of the LDP is still considered to be appropriate going forward. It is not thought that the changes proposed will have any fundamental adverse impact on the original SA and that the actual changes proposed are sustainable - they are relatively minor and are underpinned by the existing strategy, vision and objectives. Once the detail of the revisions are made, a SA/SEA and HRA of the deposit Plan will be undertaken

Implication of the revision on the rest of the Plan

52. The majority of the changes envisaged are stand alone relating to specific new policies or refining existing policies. The fundamental strategy of the Plan is not changing and any new housing sites will be required to meet the additional years of the extended plan period. As a result there are limited consequential impacts on other parts of the Plan which are not considered to be significant. As the revision process progresses, it is possible that some additional evidence will be required to support the revision of the Eryri LDP.

53. Moving forward the Authority will work with Community Councils who are interested, to look at the possibility of drafting place plans where appropriate.

Conclusion and Type of Revision

54. Due to the consensus that the existing strategy remains relevant, the minimal changes proposed and the implications for the rest of the plan it is considered that a short form revision would be the most appropriate method of moving forward and completing the revision in a timely and cost efficient manner.

Appendix 1: Key stakeholders engaged on the discussion paper

Specific Consultation Bodies

The Welsh Government

The Planning Inspectorate

Natural Resources Wales

Network Rail Infrastructure Limited

Secretary of State for Transport

Adjacent Local Planning Authorities

Gwynedd Council

Conwy Council

Ceredigion Council

Powys Council

Denbighshire Council

Community and Town Councils

Any person to whom the electronic communications code applies

CTIL (on behalf of Vodafone and telephonica)

MBNL (EE AND Three)

BT

Any Person who own or controls electronic apparatus

Arqiva

Local Health Board

Betsi Cadwalader

Electricity

SP energy Networks & Wales and West Utilities

National Grid

Gas

National Grid

Sewerage Undertaker

Welsh Water

United utilities

Water Undertaker

Welsh Water

Severn Trent Water

UK Government Departments

Department for Climate and Energy Change

MOD

General Consultation Bodies

Voluntary bodies, some or all of whose activities benefit any part of the Authority's area

Snowdonia Society

Campaign for the protection of rural Wales

Cymdeithas Edward Llwyd

Equality groups including racial, ethnic or national groups

Equality and Human Rights Commission

North Wales Regional Equality Network

Stonewall

Different Religious groups

Bangor Islamic Centre

Wales Orthodox Mission

Cytun

Disabled People

Meirionnydd Access Group

Arfon Action Group

Dwyfor Access Group

Conwy County Voluntary

Deaf Association North Wales

North Wales Society for the Blind

Disability Wales

Equality and Human Rights Commission

Elderly people

Age Cymru

Age Concern Gwynedd a Mon

Age Concern North Wales Central

Business in the park

Gwynedd Economy and Regeneration

Conwy Regeneration service

Federation of Small Businesses

Menter Mon

North Wales Business Club

Interests of Welsh Culture

Welsh Language Commission

Cymdeithas yr Iaith

Menter Iaith Conwy

Hunaniath

Cymuned

Urdd Gobaith Cymru

Dyfodol i'r Iaith

Cylch yr Iaith

Voluntary groups in the area

Mantell Gwynedd

Wales Council for Voluntary Action

Conwy Voluntary Services Council

Shelter Cymru

Talsarn Community first Partnership area

Local Members of Parliament and Welsh Assembly Members

Others

National Trust

National Farmers Union

Farmers Union Wales

Visit Wales

Council for National Parks

Home Builders Federation

Sports Council for Wales

One Voice Wales

Appendix 2: Key stakeholder views on the discussion paper on the Eryri LDP Review

Reference	Name	Organisation (if relevant)	Summary of comments	Officer comments
1/1	John Harold	Snowdonia Society	The document takes a sensible approach and we agree that there is no evidence that the plan is flawed or in need of fundamental change. We therefore also agree that there is only a limited need for changes to the plan. We are in agreement with each of the three consultation questions in Appendix 1.	Noted
1/2	John Harold	Snowdonia Society	The Snowdonia Society will be particularly interested to see how the revised plan will address Enterprise Zone policies, and policies dealing with types of tourism accommodation.	Noted
1/3	John Harold	Snowdonia Society	Paragraph 6, the fifth bullet point concludes with 'It is <u>not</u> considered that a higher rate of development would <u>not</u> be desirable in the National Park and would be difficult to practically deliver.' Is one of the highlighted 'nots' an error?	Yes. Delete first 'not' in the sentence.
1/4	John Harold	Snowdonia Society	Paragraph 8. We agree that the outcomes of this process and any consequences thereof are unpredictable.	Noted and agree.
1/5	John Harold	Snowdonia Society	Paragraph 17. The reference to 'concentration of new development in a few places' may be of significance when developing policy around Enterprise Zones.	Noted. It is anticipated that the jobs created relating to the Enterprise Zone designation will re-instate those gradually lost from the previous activities on the sites and is unlikely to have a significant impact on the scale and location of future housing growth and therefore unlikely to have an impact on the existing Strategy. The potential impact of the designation of Snowdonia Enterprise Zone will continue to be considered throughout the Eryri LDP revision process and in developing policy relating to the Snowdonia Enterprise Zone.

1/6	John Harold	Snowdonia Society	Paragraph 18. Landscape sensitivity and capacity guidance – please refer to our submission on your separate consultation on this issue.	Noted. Consideration will be given to previous comments made on the Landscape sensitivity and capacity guidance
2/1	Mark Harris	Home Builders Federation	Do you agree with the issues considered as part of the review? Yes however we would suggest that greater consideration needs to be given to the designation of the Snowdonia Enterprise Zone and the impact on the wider economy of the economic growth that this could create, this in turn could have a knock on effect on the need for and location of new housing to serve this potential growth.	Noted. It is anticipated that the jobs created relating to the Enterprise Zone designation will re-instate those gradually lost from the previous activities on the sites and is unlikely to have a significant impact on the scale and location of future housing growth and therefore unlikely to have an impact on the existing Strategy. However the potential impact of the designation of Snowdonia Enterprise Zone will continue to be considered throughout the Eryri LDP revision process.
2/2	Mark Harris	Home Builders Federation	With regard to the 5 year land supply it is noted that since 2013 this has been falling at 1.2 yr each year (2013 -9.5, 2014 -8.3, 2015 -7,) if this trend continues there will potentially not be a 5 yr land supply in 2017 / 2018 (2016 - 5.8, 2017 -4.6). This needs to be considered and understood	The Eryri LDP has a more than adequate supply of housing land and the Authority will continue to monitor the housing land supply annually. New housing will be required to cater for a plan period extending beyond 2022 and to provide greater choice and flexibility of sites to ensure a sustained delivery of new housing.
2/3	Mark Harris	Home Builders Federation	We would also suggest a review of the main housing policies to ensure that they are assisting with bringing development forward and not restricting in particular smaller builders, as it is these who you are relying on to deliver the plans housing strategy. This issue relates to both market and affordable housing provision.	Noted and agree. The main housing policies will be considered further and if necessary reviewed to ensure that they are assisting with delivering the numbers of market and local affordable needs housing required and not restricting smaller house builders.

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2/4	Mark Harris	Home Builders Federation	Do you agree with the Authority on what needs to change and why? Yes but would suggest in addition: A review of existing allocations which have not yet been delivered to ensure that they are still viable or have willing landowners who do intend to develop the sites. Sites rolled forward from previous plans where there has been no further process should be considered for de-allocation/ replacement.	Noted and agree. The Authority will review existing allocations which have not yet been delivered to ensure that they are still viable or have willing landowners who do intend to develop the sites.
2/5	Mark Harris	Home Builders Federation	Do you agree with the conclusion that the short form of revision process is the most appropriate method of moving forward? Subject to consideration of my answers to question 1 and 2 the level of change to the plan currently proposed/anticipated seems to suggest that a short form could be appropriate, although it is noted that this is a decision for the Welsh Government.	Noted
3/1	Richard Roberts	Cartrefi Cymunedol Gwynedd	Yes CCG agrees in principle with the issues. However, in respect of the spatial development strategy the shortage of affordable housing to rent or to buy is one of the greatest challenges facing many communities in Snowdonia and the accessibility and affordability of housing is an essential factor in securing long term sustainability of our rural areas. CCG believes it is crucial to the future of the National Park that a balanced population is secured which is not just limited to the provision of affordable housing.	Noted. The Eryri LDP revision will need to consider revising the main housing policies to ensure that they are assisting with delivering the numbers of market and local affordable needs housing required.

3/2	Richard Roberts	Cartrefi Cymunedol Gwynedd	Yes CCG agrees in principle with the changes. However, due to the many opportunities CCG has for development and disposals within the National Park we believe we can assist the NPA to meet its affordable housing targets. Our initial discussions with your planning officers have indicated that if appropriate and robust evidence can be provided for new sites, these will be given due consideration as part of the ELDP review. CCG has a number of sites within the key settlement areas that are suitable for private development and/or disposal and where the proceeds from disposals would help finance the social housing demands in those communities, e.g. our sites at Aberdyfi and Dyffryn Ardudwy. Changes to the ELDP policies will be necessary to enable this innovative approach. The ELDP policies could also be adapted to support planning gain sites on the fringes of development zones through enhanced biodiversity enhancement and management, e.g. our site at Wenallt, Dolgellau.	Noted. New housing sites will be required to cater for a plan period extending beyond 2022 to provide greater choice and flexibility of sites to ensure a sustained delivery of new housing. There will be an opportunity to submit potential housing sites to be considered as part of the call for sites process. The Eryri LDP revision will also need to consider revising the main housing policies to ensure that they are assisting with delivering the numbers of market and local affordable needs housing required.
3/3	Richard Roberts	Cartrefi Cymunedol Gwynedd	Yes CCG agrees in principle with the revision process.	Noted
4/1	Dewi Griffiths	Welsh Water	Agree with issues considered as part of the review. Welsh Water notes that the revision process will require the identification of additional development land and welcome the opportunity to comment on these in due course. We also welcome the intention to formulate new policy to regulate development within the Snowdonia Enterprise Zones.	Noted. The Authority will involve welsh water in the consideration of potential sites following the call for sites process.
4/2	Dewi Griffiths	Welsh Water	Agree with what needs to change and why	Noted

4/3	Dewi Griffiths	Welsh Water	Agree with the conclusion that the short form of revision process is the most appropriate method of moving forward	Noted
5/1	Gruffydd Price	Planning Agent	I've been dealing with potential applicants who want to build individual houses for themselves. These include local young people who have been offered cheap land from their parents but have to fund the construction project by raising a mortgage. They were unable to move forward because of the affordable housing policy. Being unable to get a mortgage is the principal stumbling block.	The Authority is aware that mortgage lenders are not willing to lend money on self-build schemes with 106 Agreements. This problem is a national one and is not unique to Snowdonia. The Authority has written recently to the Principality to highlight our concerns and to ask them to reconsider this. The Principality has confirmed that they will resubmit housing mortgage products with 106 affordable agreements but unfortunately not self-build housing. This situation is a cause for concern to the Authority because it makes it very difficult for individuals to fund their construction project. We are aware that some of these requests have been on exempt site where it is required in accordance with national policy for the housing to be affordable and therefore it is not possible for the Authority to negotiate on this.
5/2	Gruffydd Price	Planning Agent	Complications with the "Tai Teg" form also causes problems besides the costs of having two market valuations and paying a contribution toward the Authority's costs. One must ask if affordable housing is the goal! It seems to me that the Tai Teg form is unsuitable for the purposes of planning applicants such as these because it requires far too many personal details that are not relevant to planning matters at all.	It is important that individuals are assessed to ensure that they meet the requirements 'necessary' and 'local'. The Tai Teg form is an independent, fair and consistent way of undertaking this assessment. The questions in the form need to be personal in order to assess the needs of different individuals. Unfortunately there are additional costs involved with open market valuation but the information is essential to ensure that the house remains affordable in the future.

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5/3	Gruffydd Price	Planning Agent	The rural areas in Wales are in a dire situation re: loss of our young people especially those who aspire to improve their situation by building a new house. We can not afford to lose them and I have to ask if this policy can be revised so that it is not relevant to individual houses. I understand that there is no objection from the mortgage companies toward conditions re local needs and that the problem relates to the affordable condition.	The Authority is aware of the importance of trying to keep young people in our rural areas. The problem with self-build mortgages is a national problem and it is not unique to Snowdonia. The Authority will continue to lobby to try to influence lenders but there is also need to lobby at the national level. We are aware that some of these applications have been on exempt sites where it is a requirement in the Welsh national policy for housing to be affordable and therefore it is not possible for the Authority to negotiate on this. As part of the Plan review the Authority will examine the viability of affordable housing developments and make changes to policies and Supplementary Planning Guidance to reflect these.
6/1	Arwel Pearce	Bryncrug Community Council	Agree with the issues considered as part of the review	Noted
6/2	Arwel Pearce	Bryncrug Community Council	Agree with the Authority on the required amends and why	Noted
6/3	Arwel Pearce	Bryncrug Community Council	Agree with the conclusion that the revision procedure in short form is the most suitable method of proceeding	Noted
6/4	Arwel Pearce	Bryncrug Community Council	It is a pity that the ELDP review is not aligned with Gwynedd Council's Local Development Plan	Noted. The Authority has considered the opportunity of working with neighbouring authorities to prepare a revised plan or a joint scheme to replace the old. Gwynedd Council has yet to adopt the LDP, and is unlikely to do so until 2017. The timing, therefore, is not consistent with the ELDP review.

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7/1	Caerwyn Roberts	Betws y Coed Community Council	The Community Council agreed with all the issues considered as part of the review.	Noted
8/1	Bedwyr Gwilym	Tywyn Town Council	Tywyn Town Council has considered the discussion paper, as well as the issues considered and accepts the information as there is virtually no changes affecting Tywyn. Noted that a number of issues are of importance to the communities within the National Park, such as promoting healthy communities, improving the environment and the cultural and historic development in Llanbedr airfield..	Noted
9/1	Gethin Prys Davies	Capel Curig Community Council	"Generally we as a Community Council agreed with the issues that are being considered as part of the review, and are supportive of the process. Having said this, we feel that extending the life of the end date of the ELDP up to 2031 is unwise, if it cannot be significantly amended during this period. The document recognizes that there are limited opportunities for employment within the Park, and it is really a sad situation that only a small percentage of the residents of the Park who actually work within its boundaries. The Council would be very supportive of any changes to the ELDP which would improve young people's prospects of having quality permanent jobs in their local areas."	The ELDP period will have to be extended beyond the current date, which is 2022, to allow at least 10 years of active life after its adoption and to ensure an adequate supply of housing sites during ELDP. The Plan will continue to be monitored every year and will be fully reviewed every 4 years.
10/1	Ellen ap Dafydd	Trawsfynydd Community Council	Agree with the issues considered as part of the review	Noted
10/2	Ellen ap Dafydd	Trawsfynydd Community Council	Agree with the Authority re the amends needed and why	Noted

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10/3	Ellen ap Dafydd	Trawsfynydd Community Council	Agree with the conclusion that the revision procedure in short form is the most suitable method of proceeding	Noted
11/1	O G Thomas	Dyffryn Ardudwy Community Council	There is too much emphasis being placed on the Environment and Tourism. As a result, this has had an adverse effect on our towns and villages as far as the language and culture are concerned. Our shops and schools are closing. There needs to be many more employment opportunities of different types.	The LDP includes policies to facilitate new employment opportunities within the Park. Existing policies in the Plan also try to be as flexible as possible to allow new opportunities for farm diversification projects, and Policy 19 is flexible regarding location of new sites which may be within or adjacent to housing settlement boundaries. The designation of the Snowdonia Enterprise Zone on the two sites i.e. Trawsfynydd Power Station site and Llanbedr Airfield will also create additional employment opportunities.
11/2	O G Thomas	Dyffryn Ardudwy Community Council	The fact that we are in the Park makes it much more difficult to attract work here. Having good full-time work is much more important than anything else if we are going to try to keep our young people here..	Note - see the above comments

Appendix 3: Evidence to support the Eryri Local Development Plan Review Report

Annual Monitoring Reports

Eryri Local Development Plan Informal Annual Monitoring Report July 2011 – 31 st March 2012
Eryri Local Development Plan Annual Monitoring Report 2012-13
Eryri Local Development Plan Annual Monitoring Report 2013-14
Eryri Local Development Plan Annual Monitoring Report 2014-15

Background Papers

Eryri Local Development Plan Background Papers	Has it been updated?	Is it considered significant to support the Review Report?
Agriculture, Common Land & Forestry Background Paper 1	No	No
Coastal and Marine Background Paper 2	Yes - 2016	Yes
Cultural Heritage Background Paper 3	No	No
Employment Land Assessment Background Paper 4	Yes - 2016	Yes
Energy Background Paper 5	Yes - 2016	Yes
Green Wedges Background Paper 6	No	No
Housing Background Paper 7	Strategic Housing element updated - 2016	Yes
Landscape Background Paper 8	Yes – 2016	Yes
Minerals Background Paper 9	Yes - 2016	Yes
Open Space Assessment Background Paper 10	No - to be updated in parallel with Settlement Capacity Study following Call for Sites Stage	No
Recreation and Access Background Paper 11	No	No
Retail Assessment Background Paper 12	Yes – 2016	Yes

Eryri Local Development Plan Background Papers	Has it been updated?	Is it considered significant to support the Review Report?
Settlement Capacity Study Background Paper 13	No – Study to include assessment of potential new sites, windfalls and brownfield sites. Study to be updated following Call for Sites stage.	No
Spatial Development Strategy Background Paper 14	Yes – revisited in 2016	Yes
State of the Park Report Background Paper 15	2015	Yes
Tourism Background Paper 16	Yes - 2016	Yes
Transport and Networks Background Paper 17	Yes – 2016	Yes
Study Concerning the Economic Viability of Providing Affordable Housing Background Paper 18	No – general viability study and viability assessment of allocated sites to be prepared which may influence potential alterations to the housing policies and associated text to ensure they are capable of delivering the numbers of market and local affordable needs housing required.	No
Waste Background Paper 19	Yes – 2016	Yes
Welsh Language Background Paper 20	Yes – 2016	Yes
Zones of Influence Background Paper 21	Yes – revisited in 2016	Yes

Additional evidence / assessments

Additional Evidence
Gwynedd & Mon Gypsy & Traveller Needs Assessment 2016
Conwy Gypsy & Traveller Needs Assessment 2016
Conwy Local Housing Market Assessment 2013-2018
National Park Population Projections (2013 based)
National Park Household Projections (2013 based)
Landscape Character Areas and Seascapes
Isle of Anglesey, Gwynedd and Snowdonia National Park Landscape Capacity and Sensitivity Assessment (Gillespies, March 2014)
Dark Skies Lighting Management Plan
North Wales Planning Authorities North Wales Regional Employment Land Strategy (Arup, 2014)
Gwynedd and Anglesey Housing and the Welsh Language Survey 2014
Reconsideration of SA to support Review Report 2016
Tests of Soundness of evidence base to support Review Report 2016
Valuing Wales National Parks (Arup) 2013

Supplementary Planning Guidance

The following Supplementary Planning Guidance have been adopted following adoption of the Eryri Local Development Plan:

- [1. Sustainable Design in the National Parks of Wales](#)
- [2. General Development Considerations](#)
- [3. Planning and the Welsh Language](#)
- [4. Affordable Housing](#)
- [5. Planning Obligations](#)
- [6. Nature Conservation and Biodiversity](#)
7. Landscape and Seascapes of Eryri
 - [Part 1 \(Introduction, Contents and Methods p1-19\)](#)
 - [Part 2 \(LCA 1 to LCA 6 p20-37\)](#)
 - [Part 3 \(LCA 7 to LCA 12 p38-55\)](#)
 - [Part 4 \(LCA 13 to LCA 18 p56-73\)](#)
 - [Part 5 \(LCA 19 to LCA 22 p74-85\)](#)
 - [Part 6 \(LCA 23 to LCA 25 p86-94\)](#)
 - [Part 7 \(Seascapes Introduction & SCA 1 to SCA 20 p87-124\)](#)
 - [Part 8 \(SCA 21 to SCA 25 p125-155\)](#)
 - [Part 9 \(SCA 26 to SCA 36 p156-192\)](#)
 - [Part 10 \(Appendix 1\)](#)
- [8. Visitor Accommodation](#)
- [9. Farm Diversification](#)
- [10. Renewable and Low Carbon Energy](#)
- [11. Annexe Accommodation](#)
- [12. Enabling Sustainable Development in the Welsh National Parks](#)
- [13. Landscape Sensitivity and Capacity Assessment \(Draft\)](#)

4. Show the designation of the Snowdonia Enterprise Zone on the Proposals Map and introduce a new positive and enabling policy to manage new development within the Zone.

5. Review policies dealing with types of tourism accommodation and related contextual policies.

6. Amend retail policy to provide more flexibility on alternative uses.

7. Any other comments on the content of the Review Report.

If you require assistance to completed the form please email polisi.cynllunio@eryri-npa.gov.uk or phone 01766 and ask to speak to someone in the policy section

