

ARCHWILIAD CYNLLUN DATBLYGU LLEOL ERYRI
ERYRI LOCAL DEVELOPMENT PLAN EXAMINATION

MATTERS AND ISSUES FOR HEARING
SESSIONS

1, 2 AND 3

SUBMISSION OF EVAN OWEN
BYWYD CYMRU
RESPONSES IN GREEN

Eryri Local Development Plan 2016 – 2031

Hearing Session 3:

Chapters 3 & 4 The Natural, Cultural and Historic Environment

Matters & Issues

The Natural Environment

1. Strategic Policy D 'Natural Environment':
 - a) Although no changes are being proposed to this policy, does it continue to fulfil its purpose in protecting natural resources, biodiversity, geodiversity and the special qualities of the National Park?
2. Dark Skies Reserve and Dyfi Biosphere Reserve (Development Policy 2):
 - a) The additional text within the Plan clearly recognises the importance of these designations. However, should the Plan acknowledge that development within certain parts of the National Park will inevitably have an impact on these designations? **There will be no developemnt**
 - b) Will the Dark Skies Reserve designation result in a 'blanket approach' to the assessment of developments? And should there be a differentiation between different areas of the National Park? **The Authority doesn't appreciate that it has 20% of Wales under strict control, this land mass is so diverse and disparate that is needs to look ast ALL aspects and areas in a different 'light'**
 - c) Do the policies provide sufficient clarity on the way in which development proposals, which are likely to impact on these designations, will be considered and where mitigation and compensation measures will be required? Should this be included within policy? **Over the years the Authority has prevented so many business opportunities, this is another new tool to prevent development.**
 - d) Does the Plan provide sufficient guidance to developers/applicants on what information they need to provide in support of any planning application? Should this be clarified within Development Policy 2? **It is so confusing and discouraging that many established developers from within and without the LPA boundary have decided not to bother.**

3. Development Policy 3 'Energy' :

- a) The changes to the Plan (supporting text to Development Policy 3) acknowledge the importance of hydro power stations and microgeneration schemes. Although no changes are proposed to the policy, how will the plan assess future schemes?
- b) The Plan recognises that the landscape of the National Park is sensitive to wind turbine developments. Does the Plan comply with National Policy regarding the thresholds for different technologies, and should the Plan provide additional guidance to developers on the nature and scale of proposed renewable energy schemes within the Park?
- c) How will proposals on the boundary of the National Park within adjoining LPAs be assessed. **In the same way as those within the boundary, that means anything within human visibility will be rejected.**

4. Minerals:

- a) Do the changes proposed to Strategic Policies E1, E2 and E3 comply with national policy and provide a clear basis for dealing with developments on safeguarded aggregate or mineral deposits, as well as assessing new proposals for mineral extraction within the National Park?
- b) Does the Plan provide sufficient guidance to developers/applicants on what information they need to provide in support of any planning application? Should this be clarified within the Plan? **No and yes**

5. Waste:

- a) Does Development Policy 4 provide a clear framework for assessing applications for new waste management facilities?
- b) Does the Plan provide sufficient guidance to developers / applicants on what information they need to provide in support of any planning application? Should this be clarified within Development Policy 4?

Cultural and Historic Environment

6. Strategic Policy Ff 'Historic Environment':

- a) Is the reference to the Candidate World Heritage Sites within the policy and on the constraints map premature given that it is only included on a tentative list submitted to UNESCO? **They shouldn't be included in the same way that the Enterprise Zones were excluded during the LDP preparation. They could be challenged.**
 - b) How will planning applications within these areas be assessed during this interim period? **As normal**
7. Development Policy 9 'Conversion and Change of Use of Rural Buildings'
- a) What is meant by the term 'rural diversification scheme'? Should this be 'agricultural diversification' in line with Development Policy 20 for consistency? If so, should both policies cross refer to each other. **Policy 20 should be amended to include the term 'rural diversification scheme' which is more logical and closer to the patterns of employment in rural areas than purely 'agricultural'.**
 - b) Should the policy provide clarification and further justification on the requirement for the payment of a commuted sum for open market dwellings. Should the policy cross refer to Strategic Policy Ch? **Yes, a blanket approach regardless of location, size, scale or design is unworkable.**
8. **Does the Plan provide a sound basis for implementation and monitoring of the natural, cultural and historic environment?**
- There won't be any cultural environment when all the Welsh people have left because of the lack of decent employment and housing.**