

**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 2: Chapter 6 Supporting a Sustainable Rural Economy – Economy/Employment, Tourism and Retail

### Matters & Issues

#### 1. A Sustainable Rural Economy (Strategic Policy H)

- a. What are the anticipated outcomes of the revisions to Strategic Policy H?
- b. A new criterion has been introduced to Strategic Policy H which suggests that where employment land is lost to an another use, land of equal or better quality will be made available elsewhere, even if it is not within the National Park boundary. How will this work in practical terms and what mechanisms will be put in place to ensure delivery? Should this be explained further in the Policy?  
**It's a mystery.**
- c. Is the Revised Plan's overall approach to employment growth compatible with the levels of residential development proposed over the Plan period? **It isn't compatible with proposed growth.**

#### 2. New Employment and Training Provision (Development Policy 19)

- a. In the absence of any new small-scale employment land allocations in the Revised Plan, will the continued reliance on the re-use and/or expansion of existing allocated land and buildings or new development on smaller, unallocated sites within or adjacent to towns or villages provide adequate employment land/premises to meet the needs of the Plan area? **More 'Soft Eviction'**
- b. Is the Policy overly restrictive, especially regarding the potential for new build economic development opportunities outside settlements, such as small scale rural enterprises? **Far too restrictive, there appears to be no provision for the digital economy. Urban areas like Dyffryn Ardudwy have the highest broadband speeds available (Superfast Fibre), there seems to be no provision for homeworking or offices.**
- c. Is there an over-reliance on the availability of employment land and premises in areas outside the National Park to meet the identified local need for employment and training development?

**Of course, it seems the Authority doesn't want any economic development at all outside tourism.**

### **3. The Snowdonia Enterprise Zone**

- a. Are there any constraints that could have an effect on the deliverability of the sites over the Plan period? **The roads, this will be resolved when the Llanbedr bypass is completed.**
- b. What are the timescales for anticipated delivery and have there been any discussions with or interest shown by potential investors and developers on either site?
- c. What implications would the Enterprise Zone have on the development strategies of neighbouring authorities, and vice versa?
- d. Is the policy sufficiently flexible in terms of the type of development that could be accommodated on the site, both in terms of the use, the scale and the design of buildings? How will the Plan deal with proposals for major development on the site? **No flexibility whatsoever, the Authority hasn't been very cooperative at any stage of the reopening of the airfield, the WG complained about the process of obtaining the LDC.**
- e. Are there any infrastructure constraints at either of the sites that could affect delivery and viability? **Road and rail connections are good (when bypass finished), the connection between the two sites by road needs improvement.**
- f. What are the flooding implications on the allocation of land at Llanbedr Airfield? There is an objection by Natural Resources Wales due to the Flood Consequence Assessment confirming that parts of the site are unsuitable for development. **Flooding has always been a problem at this site, my father in law was chief pilot during the late 60s and it was an issue then.**
- g. Are the allocation boundaries of the two sites correctly drawn?

### **4. Tourism and Recreation**

- a. The revised plan introduces text that refers to the importance of adventure tourism and eco tourism to the National Park. Does the Plan, through Strategic Policy I and Development Policies 21 and 28 provide an appropriate framework for the consideration of proposals for new or enhanced tourism and leisure facilities and accommodation?

- b. Do the policies in the Plan, including new Policies 28 and 29, achieve an appropriate balance of provision and restraint in relation to existing and proposed tourism and recreation development, including any potential major development opportunities? **Too many constraints and restraints in the most financially attractive areas.**
- c. Will the Snowdonia Dark Skies Reserve have an impact on the ability of existing tourist attractions and accommodation to expand and improve facilities? **Yes, that is the intention of the dark sky designation it seems.**
- d. The additional text within Paragraph 6.34 refers to the location of tourism and recreation development within open countryside and the potential impact it has on the landscape. How will this be controlled and assessed and should this be included within Policy?
- e. Does the first sentence in Policy 21 read correctly - "Within the National Park the provision of existing tourist attractions will be protected.... **Baffling use of English**
- f. Development Policies 22 and 23: Will the additional text in paragraph 6.40 and the policy have an adverse effect on business viability and the number of tourists to the area due to the inability to increase static numbers on site, even if there is an overall improvement to the site? **Yes, that is the intention is seems, too much competition is a bad thing.**
- g. Paragraph 6.37, Development Policy 28 seems to encourage and discourage new build accommodation. Are the changes introduced by the supporting paragraphs and the new Policy 28 clear in terms of the provision of new build serviced accommodation? **Again this appears to be the intention.**
- h. How will proposals for new serviced accommodation outside of the named settlement hierarchies be assessed, for example, on agricultural diversification schemes? **Should be Rural**
- i. The LDP recognises the importance of tourism and leisure to the economy. Is Policy 29 too restrictive and inhibit opportunities for the development of a facility which may benefit the economy? **Yes**
- j. Has there been adequate assessment of the demand and requirements for alternative holiday accommodation? **It would appear to be lacking adequate research**
- k. Will Policy 29 result in a 'blanket approach' which will inhibit the ability of each proposal to be considered on its particular merits? Should there be a differentiation between different areas of the

National Park? **The blanket approach is what is holding the economy back.**

**5. Retail (Development Policy 24)**

- a. Is the distance of 300m introduced by the proposed revision in line with national policy and based on robust evidence? Is the term 'buffer zone' appropriate in this context?
- b. Is the policy clear on proposals for the change of use of vacant shops/units to residential use within other settlements not listed within the policy, especially affordable housing, where there is a proven local need?

**6. Does the Plan continue to incorporate robust monitoring and review mechanisms that would enable the economic/employment, tourism and retail strategies and policies to respond effectively to changing circumstances? **The lack of employment is acute, has this been monitored or just left to continue to worsen?****