
Hearing Statement

Hearing Session 2 – Wednesday 18th July 2017

In response to Matters & Issues 3 – The Snowdonia Enterprise Zone

Welsh Government in conjunction with Snowdonia Aerospace LLP (LPA Representation Number 034)

1. Background

- 1.1 GVA submitted representations on behalf of the Welsh Government (WG) in conjunction with Snowdonia Aerospace LLP to the Deposit Plan Consultation on 30th August 2017 and the Focussed Changes Consultation (March 2018) on 27th April 2018, which the Inspector should refer to.
- 1.2 The Snowdonia Enterprise Zone consists of two sites: Trawsfynydd and Llanbedr Airfield (now known as Snowdonia Aerospace Centre). This hearing statement has been prepared on behalf of the WG and Snowdonia Aerospace LLP and relates specifically to the Llanbedr Airfield site which is owned by WG and leased to Snowdonia Aerospace LLP on a long term lease.
- 1.3 WG and Snowdonia Aerospace LLP have worked closely with Snowdonia National Park Authority (SNPA) and Natural Resources Wales (NRW) to reach a consensus on the LDP Revision. However, it is evident that there are still a number of areas where we have been unable to reach an agreement.

2. Response to Questions 3 (a) – (g)

- 2.1 A response to each question posed by the Inspector in respect of the Snowdonia Enterprise Zone is provided below.

a. Are there any constraints that could have an effect on the deliverability of the sites over the Plan period?

- 2.2 There are a number of known site constraints, including the existing runways and their safety slopes together with operational requirements, so it is important to highlight that large areas of the site will not be suitable for development regardless of flood risk.

2.3 The airfield has three runways of 2.3km, 1.4km and 1.3km providing access to 7,100km² of segregated airspace over Cardigan Bay. However, none of these known site constraints will have an effect on the deliverability of the site over the plan period.

2.4 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. Should floodplain compensation be required, there are suitable areas within the site which could provide the required volume. NRW has confirmed in its consultation response (NRW Reference CAS-58431-B8B0, 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 as there is sufficient land available elsewhere on the site which is flood free.

2.5 Technical Advice Note 15 (TAN 15): *Development and Flood Risk* requires access to the site to remain flood free from up to and including the 1 in 200 year period tidal flood event. The flood modelling results show that, during a 1 in 200 year return period tidal event, the access to the site via the Shell Island Causeway floods. Therefore there will be a need to provide an alternative emergency route which could run north to south through the airfield, exiting through an agricultural field along a track which traverses around Fford Benar and the caravan /campsite to the south and joins Station Road which leads to the A4696. This is detailed within the submitted SFCA and will need to be agreed with NRW. A Flood Warning and Evacuation Plan will also need to be prepared and agreed, setting out warning information and arrangements for access / egress or safe refuge on-site during flood events.

2.6 Overall, despite the site's risk of flooding, appropriate mitigation and other measures are considered achievable to allow development at the site to be delivered during the plan period.

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?

2.7 Since the site was designated as part of Snowdonia Enterprise Zone in 2013, the WG and Snowdonia Aerospace LLP have worked closely with Gwynedd Council and SNPA to facilitate its development.

2.8 It is difficult to advise on likely timescales for anticipated delivery at Llanbedr Airfield but we can report that there has been a healthy level of interest shown by potential investors and developers although, understandably, the details are confidential at this time. Reflective of this interest, the site owners are now considering the next phase of investment in order to move from an initial

operating capability (IOC) to a full operating capability (FOC) (including things such as airfield licensing, creation of new airspace etc.).

- 2.9 The site is a significant asset which could support the economy of Meirionnydd by creating high value jobs for local residents. It has the capacity to accommodate a range of both airside and non-airside uses, as well as the potential to increase Wales' Remotely Piloted Aircraft Systems (RPAS) capability and to become a Centre of Excellence for developing and testing RPAS which could lead to the creation of 100 jobs in the local area (and 3,000 across Wales). However, in our considered opinion, securing a positive planning policy context for the subject site within the LDP Revision is crucial in order to attract private sector investment and support new and expanding businesses.
- 2.10 As already mentioned, the airfield has three runways of 2.3km, 1.4km and 1.3km providing access to some 7,100km² of segregated airspace over Cardigan Bay. The simultaneous access by both civil and military systems to this significant area of segregated airspace is unique to any airfield in the UK and is the first of its kind in Europe. As a strategic Welsh and UK asset, it is being taken forward as a centre of excellence for unmanned systems and emerging technologies. The site's location, coupled with integrated airfield and airspace infrastructure have also reinforced its potential as a UK Spaceport. As such, the site presents a unique economic development opportunity within the National Park with the potential to offer sustainable, value added employment opportunities within Meirionnydd and the wider region.
- 2.11 To date, there has been an investment of over £1.5m by Snowdonia Aerospace LLP, QinetiQ and the WG which is laying the foundations to attract further investment and jobs. Since 2015, this has attracted a number of new businesses to the site, bringing the total number of businesses on site to 15, employing in the region of 50 people.
- 2.12 There are a number of live commercial enquiries which are confidential and currently subject to further discussions between the private sector, site owners and key stakeholders. As recently reported in the press, there has been interest from B2Space, a satellite firm, which could relocate from Bristol to Llanbedr and create 93 specialist jobs at the site, based on it launching 30 satellites a year by 2020 for purposes including tracking changes to the environment and coastlines. The development of such a low-cost satellite launch operation could be a catalyst for innovation and jobs in a growing space market.
- 2.13 The healthy number of enquiries reflect the unique operating environment at Llanbedr Airfield which is one of the very few ex-Ministry of Defence sites to re-open and the only one with three operational runways. The site benefits from its enhanced facilities, the Snowdonia Enterprise Zone status and the re-establishment of segregated airspace to enable the safe testing of unmanned aerial vehicles (UAVs) and the evaluation of systems and proof of concept demonstrations.

2.14 It is also worth highlighting that, given the site's aspirations to become a centre for excellence for RPAS, there is scope to define more immediate skills development requirements and stimulate further interest in science, technology, engineering and mathematics (STEM) subjects locally amongst schools. Indeed, the WG hosted a successful youth engagement event at the site in July 2014 in order to showcase the Snowdonia Enterprise Zone and reinforcing its commitment to encouraging more young people, particularly girls, into careers in science and engineering. This also demonstrated potential future career and employment opportunities in science and engineering available students locally in Meirionnydd. This school engagement is critical as there is a need to ensure that Wales has a workforce which is globally competitive and at the forefront of growth and innovation.

2.15 It is also worth mentioning that the annual Unmanned Aircraft Systems Challenge (UAS) challenge, sponsored by Institute of Mechanical Engineers (IMECH), will be taking place at the Llanbedr Airfield site on 18-19th June 2018 with some 20-30 universities from all over the world taking part, and local schools will be engaged during those 2 days. This is the second year this has been undertaken from the site with this year's event being much larger than previous years.

c. What implications would the Enterprise Zone have on the development strategies of neighbouring authorities, and vice versa?

2.16 In our view, this question would be most suitably answered by SNPA given their consultation with neighbouring authorities that has no doubt taken place.

2.17 We do not anticipate any conflicting interests between the SEZ and the other enterprise zones in North Wales (at Anglesey and Deeside). Each enterprise zone is designated based on specific industries.

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?

2.18 As previously explained, we do not consider the policy to be 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 design.

2.19 Firstly, in terms of uses, we maintain our contention that the current wording of the proposed policy is too restrictive in terms of supporting all of the potential uses at the site. Fundamentally, there is potential for the site to accommodate small and medium-sized enterprises (SMEs) and other local non-aviation and aerospace related industries. Such businesses and industries to support and enhance the employment offer at the Llanbedr site, as well as generate significant new employment opportunities for the National Park. It is for this reason that we have suggested

that the bullet point 2 of Development Policy 27, Part B, should be amended to support “new uses including employment B1, B2, B8 and other uses associated with research and development’ whilst not restricting uses to those solely related to aviation and aerospace industries. A limitation of this nature would be too restrictive and unsustainable.

2.20 Secondly, we consider the proposed policy to be too prescriptive in terms of the height, scale and design of the proposed buildings. The crux of the matter is that we would not want overly-prescriptive design criteria to foreclose potential development proposals coming forward on the site. We have previously explained that the design, scale and height of aviation and aerospace related buildings have to meet operational requirements. As such, development proposals should be considered in the context of the Enterprise Zone allocation, as well as the existing operational use of the Llanbedr site, and height should not be restricted to be no higher than existing buildings as suggested. Design is a specific matter and will vary according to each development proposal that may come forward at the site and should be appropriate to the scale, nature, location, context and use of each proposal.

2.21 We are also concerned as to how the plan will deal with major development, given that such proposals may come forward within the enterprise zone during the plan period. In our view, the SEZ is likely to be an appropriate location for major development, despite its location within a National Park, given its nature as a national designation and therefore its strategic employment function. It may be appropriate for Strategic Policy B to acknowledge the SEZ as a location in which major development is more likely to be acceptable.

e. Are there any infrastructure constraints at either of the sites that could affect delivery and viability?

2.22 We are not aware of any infrastructure constraints that could affect the short term delivery or viability of employment development at the site.

2.23 The WG has supported the establishment of an Initial Operating Capability (IOC) at the site by investing in key site infrastructure. The air traffic control tower and the new dedicated RPAS Hangar (former fire station) have undergone a total refurbishment, refuelling facilities and fire cover are on site, and ultrafast broadband has been installed. The refurbishment of the control tower, for example, is central to the successful development and integration of processes and procedures for test flight operations, signalling the reopening of Llanbedr Airfield as a centre of excellence for autonomous systems and expanding Wales’ RPAS environment capability.

2.24 It is acknowledged that investment is required in highway infrastructure and preparatory work is underway on improving site access. A planning application for the access road has been submitted to SNPA and is pending determination. The creation of this new access road would avoid the centre of Llanbedr village and address the transport challenges especially during the

summer months when a significant number of visitors come to the village. The WG and Snowdonia Aerospace LLP have been working closely with Gwynedd Council for some time in order to identify funding packages for this access road and on-site infrastructure. It was agreed at the end of last year (December 2017) that Gwynedd Council would take the role of Lead Body in applying for European funding. Subject to securing planning permission (expected in the autumn 2018), the building works could commence this year and be completed during 2021. This is based on the fact that the Welsh European Funding Officer (WEFO) funding letter has now been received offering Gwynedd Council and Snowdonia Aerospace LLP £7.5m towards the ongoing development of the site and road infrastructure improvements.

2.25 In summary, Llanbedr Airfield offers a truly unique site, tailor-made for aerospace businesses, as it has the following:

- dedicated Remotely Piloted Aircraft Systems (RPAS), Maintenance, Repair and Overhaul (MRO) areas and business park;
- access to 7,100km² of segregated airspace unrivalled across Europe;
- state-of-the-art infrastructure, and
- ultrafast broadband connectivity.
- rich environment with low levels of commercial air traffic

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.

2.26 The majority of the Llanbedr Airfield site (approximately 185 hectares) falls within Flood Zone A as defined by the Technical Advice Note 15 (TAN15) Development Advice Maps. However, as part of the early consultation process on the emerging LDP Review, NRW identified that a northern portion of the Llanbedr Airfield site falls within Zone C1 and C2, as defined by the Technical Advice Note 15 (TAN15) Development Advice Maps, and requested that a Strategic Flood Consequences Assessment (SFCA) was prepared for the site to identify if the potential allocation within Zone C comply with the requirements set out in TAN15.

2.27 A SFCA (Version 5.0) has been prepared by GVA, on behalf of the WG and Snowdonia Aerospace LLP, and submitted as evidence in support of the proposed site allocation. In order to ensure that the SFCA was fully compliant with PPW and TAN15, and addressed NRW's concerns, JBA Consulting was commissioned to update NRW's hydraulic flood model with the latest climate change scenarios.

- 2.28 The majority of the draft allocation for the proposed LDP 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 LDP 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.
- 2.29 In summary, the SFCA concludes that the north-western and north-eastern areas of the site are not presently considered suitable for development as the existing flood defences do not provide this area of the site with sufficient flood protection during a 1 in 200 year plus climate change flood event. This would change if there was further investment to be made to the sea defences during the Plan period. The SFCA has identified two parcels of land to the south of the existing LDP focus area, extending to some 19 hectares, which could be allocated as a new focus area for development which are entirely outside the 1 in 200-year plus climate change flood outline, together with an additional area of land (extending to some 10.5 hectares) where land raising would be required, thus providing a total of 29.6 hectares.
- 2.30 In response to the most recent consultation on the proposed focussed changes to the LDP Revision, NRW has written to SNPA and removed its holding objection to the proposed allocation of the land at Llanbedr Airfield. A copy of this consultation response (NRW Reference CAS-58431-B8B0 and dated 19th April 2018) is included as Appendix A to this statement.
- 2.31 The merits of preparing a Statement of Common Ground (which would have comprised a tri-party statement jointly prepared by SNPA, NRW and WG) were discussed with SNPA but ultimately they did not consider it necessary given the written confirmation from NRW raising no objection to the proposed allocation. Besides, all three parties will be present at the scheduled hearing session to discuss this technical matter if required.

g. Are the allocation boundaries of the two sites correctly drawn?

- 2.32 We are of the opinion that the allocation boundary for this site has not been drawn correctly.
- 2.33 In our representation to the Deposit Plan we confirmed our support for the redline boundary for the Llanbedr Airfield site, as delineated on the LDP proposal Map under reference PME/02.
- 2.34 We feel that it would be premature to limit the site area to anything less than the designated SEZ boundary. In light of this, it is considered that a broad area should be identified in order to provide flexibility and maximise the site's economic development potential.
- 2.35 Therefore, in terms of consistency and accuracy, we consider that the allocation boundary for the site should reflect the red line plan of the Enterprise Zone as designated by the WG in 2013.
- 2.36 As things stand, we consider that the allocation boundary for the site at Llanbedr Airfield is simply too small and would foreclose potential opportunities at the Enterprise Zone. In light of the SFCA

prepared for the site, which has been reviewed and agreed by NRW, it will be necessary to identify revised focus areas for development as part of the outline masterplan for the site, to be informed by appropriate technical assessments to identify developable areas and determine more precisely the impact of the proposed development at the site, taking into account the detailed FCA work, along with landscape, ecology and any other relevant planning considerations.

- 2.37 In summary, given that there is currently no masterplan for the site, we request that the amended Proposals Map allocation for Llanbedr comprises a single red line boundary for the site (as shown on plan reference GVA/SLP/01) rather than a revised focus area for development. The focus area can be defined in the outline masterplan to be prepared and informed by the relevant technical assessments, including the SFCA.

3. Conclusion

- 3.1 This Statement has provided the position of the WG and Snowdonia Aerospace LLP in respect of Questions 3 (a) – (g) of the Inspector’s Matters and Issues.
- 3.2 The WG and Snowdonia Aerospace LLP have serious concerns with the Deposit LDP Revision. GVA submitted representations on behalf of our clients to the Deposit Plan Consultation on 30th August 2017 and the Focussed Changes Consultation (March 2018) on 27th April 2018. It is considered fundamental that the Inspector has due regard to these previous representations.
- 3.3 Over the past 14 months there has been extensive detailed dialogue with SNPA and NRW, especially in response to technical concerns regarding flood risk, culminating in a final SFCA being prepared by GVA, on behalf of WG and Snowdonia Aerospace LLP, and agreed by NRW. This has been submitted in support of the proposed site allocation at Llanbedr Airfield and demonstrates that there is no technical reason to prevent its positive allocation.
- 3.4 We consider it imperative to ensure that there is a favourable planning policy context for the Snowdonia Enterprise Zone 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
 - strengthen the competitiveness of the Welsh economy

- 3.5 However, as things stand, we are concerned that the emerging planning policies of the LDP Revision could hinder rather than encourage investment and development on the subject site which is a significant strategic Welsh and UK asset which could support the economy of Merionnydd and the wider area by creating high value jobs for local residents.

Appendix 1 – Consultation Response (Reference CAS-58431-B8B0, dated 19th April 2018) from Natural Resources Wales (NRW) to Snowdonia National Park Authority (SNPA)

Mrs Rebeca Jones,
Pennaeth Polisi Cynllunio/ Head of Planning Policy,
Parc Cenedlaethol Eryri,
Swyddfeydd y Parc,
Penrhyndeudraeth,
Gwynedd.
LL48 6LF

19/04/2018

Annwyl / Dear Mrs Jones,

Awdurdod Parc Cenedlaethol Eryri / Snowdonia National Park Authority

Adolygiad Cynllun Datblygu Lleol / Revision of Local Development Plan

Newidiadau Ffocws Arfaethedig / Proposed Focussed Changes

Thank you for consulting Natural Resources Wales (NRW) with regards to the proposed focussed changes.

We have reviewed the consultation documentation and have the following comments to make. Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent strategy consultations. At the time of any other consultation there may be new information available which we will need to take into account in making a formal response.

NRW has previously provided comments on the Revision of the Local Development Plan (LDP) (Proposed Plan Revisions – Deposit Representations (18/09/2017)). Where relevant our previous comments are still applicable and the comments in this letter relate specifically to the Focussed Changes.

Focussed Changes

Snowdonia Enterprise Zones – Llanbedr

In our response to the Proposed Plan Revisions – Deposit Representations (18/09/2017) we had significant concerns and objected to the ‘Snowdonia Enterprise Zone (SEZ) Allocation PME/01’ at Llanbedr as the SFCA available at stage confirmed that parts of the allocation area was unsuitable for development in all circumstances and therefore did not comply with the requirements of TAN15.

It is noted that the plan outlining the extent of the allocation at the Llanbedr SEZ has been reduced (focussed change NFf36) in comparison to that shown in the Deposit Version – Proposals Maps and Inset Maps Revisions Document. NRW has provided comments on the Strategic Flood Consequence Assessment (SFCA) Llanbedr Airfield, Llanbedr, Gwynedd, LL45 2PX Snowdonia Aerospace LLP (Version 4, December 2017). The SFCA identifies 3 parcels capable of accommodating development (shown in figure 19 of that document). NRW in its response to SFCA stated that we support the inclusion of the two areas outlined in green in Figure 19 – the SFCA demonstrates compliance with A1.14 and A1.15 of TAN15. Option 2 (land raising) is also considered viable subject to further modelling regarding the possible need for compensatory storage.

The allocation at the Llanbedr SEZ (shown in focussed change NFf36) is a combination of the area shown as Option 2 (land raising) and part of the 11.88 ha area outlined in green (both areas are shown in figure 19 of the SFCA). In light of the updated SFCA provided and the reduction in the allocation shown NRW has no objection to the proposed allocation.

Focussed Change NFf23 – NRW welcomes that any masterplan should be landscape led ensuring that full consideration is given to the potential impacts of any proposed development on the landscape, and that detailed consideration of design, height, scale and siting of development would be guided by the masterplan for the site and be informed by robust technical assessment in respect of landscape and visual impact.

It is noted that Focussed Change NFf28 has included additional text which states that part of the wider enterprise zone area as identified on the proposals map is within an area of flood risk. Detailed proposals will need to demonstrate that the proposed development incorporates appropriate and acceptable flood risk mitigation measures agreed with NRW.

In our Proposed Plan Revisions – Deposit Representations (18/09/2017) we stated that Development Policy 27 needs to recognise the flood risks associated with developing the allocation area (PME/01) (excluding the areas confirmed as being unsuitable for any development) and confirm that development within this area is only acceptable subject to the LPA in consultation with NRW agreeing appropriate mitigation options that would ensure that the site remains dry during a flood event. The wording in the text in Focussed Change NFf28 refers to the wider enterprise zone, however in light of the findings of the SFCA (Version 4, December 2017) identifying the need for land raising to overcome flood risk issues within allocation PME/01 it is necessary to identify flood risk associated with both PME/01 and PME/02.

Snowdonia Enterprise Zones – Trawsfynydd

It is noted that Focussed Change NFf25 has included additional text stating that development is anticipated to be focused on the area identified in the plan allocation, which extends to approximately 58 hectares. It is assumed that the reduced allocation (58 ha in comparison to the figure of 135ha referred to in the Proposed Plan Revision document) aligns with the area identified in plan PME/03. Provided the lake is excluded, we are satisfied that the Allocation plan confirms that the proposed allocation (PME/03)

falls within Zone A of the Development Advice Map (DAM) contained in TAN15 and is therefore outside the areas identified at flood risk.

Other Matters

Chapter 2: Development Strategy

It is noted that Focussed Change NFf08 has included additional text stating that any future large scale renewable energy development proposals come forward will be assessed against Strategic Policy B. We welcome reference to the need to assess any such development against Strategic Policy B in particular against criteria iii) and iv) of that policy.

Focussed Changes NFf10 and NFf11 – NRW welcome reference to not causing harm to landscape and nature conservation interests when considering renewable energy schemes.

Chapter 5: Promoting Healthy and Sustainable Communities

Focussed Change NFf20 - Land adjacent Penyrhwylfa, Harlech is listed in the housing allocations. NRW previously objected to this allocation, however following amendments to the SFCA prepared for the site we no longer have any objection to site on flood risk grounds (as confirmed in our letter dated 02/10/2017).

Chapter 6: Supporting a Sustainable Rural Economy

Focussed Change NFf22 - In relation to small scale employment related development NRW welcomes reference to it only being appropriate if the scale and design of the development including its setting respects and conserves the character of the landscape.

Focussed Change NFf30 – NRW welcomes reference to there being no unacceptable impact on the landscape in relation to static caravans and chalet development.

Strategic Environmental Assessment and Sustainability Appraisal of the Focussed Changes March 2018

We note that the proposed focussed changes to policies have been assessed against the SEA/SA objectives (Strategic Environmental Assessment and Sustainability Appraisal of the Focussed Changes March 2018). We are satisfied that the key sustainability issues and opportunities associated with the focussed changes have been identified.

NRW in its response to the Proposed Plan Revisions – Deposit Representations (18/09/2017) stated that with regards to the compatibility of the SA objectives and LDP objectives, NRW considered that the Plan was currently unsound as two of the proposed allocations did not conform with the requirements of TAN15. However following the receipt of additional information NRW no longer objects to those proposed allocations.

Shadow Habitats Regulations Assessment of the Snowdonia National Park Authority Revised Local Development Plan 2016-2031 HRA ADDENDUM: Assessment of Focussed Changes March 2018

We acknowledge that a 'shadow' HRA in respect of the proposed review of the LDP was undertaken by way of an Addendum to the March 2009 HRA which was completed in respect of the original LDP. We note that the focus of the addendum is therefore to assess the changes which are identified through the review report and to update the findings of the earlier HRA accordingly.

We note the conclusion that no further assessment is required under the Habitats Regulations as all focussed changes considered to be relevant to the HRA have been identified as having no likely significant effect at all. As such, the revisions have no residual effects which might combine with the effects from other proposals and do not require assessment in combination with other plans and projects. We do not wish to comment further on this addendum to the HRA.

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.

Our comments above only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website: (<https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en>). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies
Cynghorydd Cynllunio Datblygu / Development Planning Advisor
Cyfoeth Naturiol Cymru / Natural Resources Wales