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21/06/2018

Annwyl / Dear Mrs Randall,

Awdurdod Parc Cenedlaethol Eryri / Snowdonia National Park Authority

Adolygiad Cynllun Datblygu Lleol / Revision of Local Development Plan

Hearing Sessions: Matters and Issues

Please find below our response to the Matters and Issues document prepared for the Eryri LDP plan examination.

NRW has previously provided comments on the Revision of the Local Development Plan (LDP) (Proposed Plan Revisions – Deposit Representations (18/09/2017) and Focussed Changes Representations (19/04/2018). Where relevant our previous comments are still applicable and the comments in this letter relate specifically to the Matters and Issues document.

Hearing Session 1

Part 1. Question B)

We would refer you to our Deposit and Focussed Changes Representations.

Hearing Session 2

Part 3. Question F)

We would refer you to our Focussed Changes Representations.

Part 4. Question D)

The key objectives of the Natural Environment section and Development Policy 2: Development and the Landscape (2) should if worded appropriately, provide the basis for managing all development proposals sustainably within open countryside.

We suggest either providing a cross reference to the Natural Environment section (updated with our proposed amendments below), or the inclusion of the following criteria within each development specific policy;

Ensure that all development is undertaken in a way that protects and enhances landscape character, qualities and views of the National Park that contribute to its natural beauty (see policy section on the Natural Environment).

Hearing Session 3

Part 1. Question A)

We suggest some changes to the Natural Environment Policy would be beneficial (additional text shown in bold):

Section 3.1 objectives

Amend the 5th objective to present wider interpretation

Ensure that all development is undertaken in a way that protects and enhances landscape character, qualities and views of the National Park that contribute to its natural beauty (delete geodiversity already referred to under natural resources objective 4)

Make this point 2 after biodiversity as this is a key principle underpinning the purpose of National Park designation.

Section 3.2

It would be beneficial to clarify what the term 'Special Qualities' encapsulates here. The text highlighted in bold below comes from

<http://www.nationalparks.gov.uk/students/whatisanationalpark/specialqualities>

'Sense of Place' is helpful to conveying cultural recognition and connection that a place can provide. It comes from aesthetic, historical and cultural identity evident within the character of a place.

*3.2 The first purpose of National Park designation places a responsibility to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park. It is the complex interaction between people, wildlife and the environment that has, over time, given rise to Snowdonia's 'Special Qualities' **derived from the area's landscape and views, geology and geography, biodiversity and rare species, archaeology and history**, which are so highly valued today and which contribute greatly to a sense of place and quality of life of both the Park's residents and the many visitors to the area.*

Part 2

Development Policy 2: Development and the Landscape (2)

Some additional guidance criteria would help address the Inspector's questions on controlling development specific impacts (additional text shown in bold).

*The scale and design of new development, including its setting, landscaping **and integration** should respect and conserve the character, **qualities and views** of the landscape;*

Characteristic landscape features of the site such as landforms, field boundaries, hedgerows, trees, woodland and habitats etc. that are in poor condition should be enhanced;

Existing development within the site that has a detrimental effect on landscape character should be integrated;

Unacceptable impacts on the landscape will be resisted and particular regard will be had to the protection of:

- i. The Snowdonia Dark Skies Reserve, in particular Core Areas*
- ii. The Dyfi Biosphere Reserve*
- i.iii. Section 3 areas of natural beauty³⁵.*
- ii.iv. Undeveloped coast.*
- iii.v. Panoramas visible from significant viewpoints.*
- iv.vi. Sensitive Landscape Character Areas ~~Landscape character areas based on LANDMAP and~~ as defined in the Supplementary Planning Guidance documents the Landscapes of Eryri ~~Supplementary Planning Guidance~~ and the Landscape Sensitivity and Capacity Assessment.*

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.

Yn gywir / Yours sincerely,

Daniel Davies

Daniel Davies

Cynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales