



Complete Agenda

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Council Offices
CAERNARFON
Gwynedd
LL55 1SH

Meeting

LLŶN A.O.N.B JOINT ADVISORY COMMITTEE

Date and Time

4.30 pm, WEDNESDAY, 20TH DECEMBER, 2017

Location

Plas Heli, Pwllheli, LL53 5YQ

Contact Point

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(DISTRIBUTED 12/12/17)

LLŶN A.O.N.B JOINT ADVISORY COMMITTEE

MEMBERSHIP

Gwynedd Councillors

**Anwen Davies
Simon Glyn
John Brynmor Hughes
Aled Wyn Jones
Gareth Williams**

Others

Aberdaron, Buan, Botwnnog, Clynnog, Llanbedrog, Llanaelhaearn, Llanengan, Nefyn, Pistyll and Tudweiliog Community Council nominees.

Nominees of the following agencies/institutions:

**National Trust,
Natural Resources Wales,
Arfon and Dwyfor Access Forum,
Cyfeillion Llŷn,
National Farmers Union,
Farmers Union of Wales,
Abersoch and Llŷn Tourism Partnership,
Campaign for the Protection of Rural Wales,
Gwynedd Archaeological Trust,
Llŷn Fishermen's Association.**

A G E N D A

1. CHAIR

To elect a chair for 2017/18.

2. VICE-CHAIR

To elect a vice-chair for 2017/18.

3. APOLOGIES

To receive apologies for absence.

4. DECLARATION OF PERSONAL INTEREST

To receive any declaration of personal interest.

5. URGENT ITEMS

To note any items that are a matter of urgency in the view of the Chairman for consideration.

6. MINUTES

4 - 8

The Chairman shall propose that the minutes of this committee, held on 6 September 2017, be signed as a true record.

7. AONB MANAGEMENT PLAN – PROPOSED CHANGES

9 - 25

To consider the report of the Llyn AONB Service Manager.

LLŶN AREA OF OUTSTANDING NATURAL BEAUTY JOINT ADVISORY COMMITTEE 6/9/17

Present: T. Victor Jones (Llanbedrog Community Council) (Chair)

Members: Councillor Gareth Williams (Gwynedd Council), Eirian Allport (Clynnog Fawr Community Council), Noel Davey (Campaign for the Protection of Rural Wales), Brett Garner (Llŷn Anglers Association), John Gosling (Abersoch and Llŷn Tourism Partneriaeth), Laura Hughes (National Trust), Morgan Jones-Parry (Arfon and Dwyfor Access Forum), Sian Parri (Tudweiliog Community Council), Sianelen Fleming (Pistyll Community Council), Alun Price (Natural Resources Wales), Hedd Rhys (NFU Cymru) and Gruffydd Williams (Nefyn Town Council).

Officers: Bleddyn P. Jones (Llŷn AONB Service Manager), Elin Wyn Hughes (Llŷn AONB Projects Officer), Wyn Williams (Countryside and Access Manager) and Bethan Adams (Member Support Officer).

Apologies: Councillors Anwen Davies, Simon Glyn and John Brynmor Hughes (Gwynedd Council), along with Jina Gwyrfai (Llanaelhaearn Community Council), Gillian Walker (Cyfeillion Llŷn) and Wenda Williams (Aberdaron Community Council).

The Llŷn AONB Service Manager welcomed the members to the meeting. He noted that the Llŷn Area of Outstanding Natural Beauty had been established in 1957 and had given protected status to the area. He elaborated upon the work of the AONB Unit.

Everyone introduced themselves.

1. CHAIR

A request was made for nominations for Chair for the 2017-18 year. Members noted their wish for the current Chair to continue. It was explained that a Chair's term was only one year, therefore, it was not possible to re-elect.

Members noted their wish to wait until the next meeting to elect a Chair in order to give the other members not in attendance an opportunity.

RESOLVED to elect T. Victor Jones as Chair for this meeting.

The Chair took the opportunity to thank the former members for their contribution to the Joint Committee and he welcomed the new members who were attending their first meeting.

2. DECLARATION OF PERSONAL INTEREST

Councillor Gruffydd Williams (Nefyn Town Council) declared a personal interest in item 8 on the agenda as he was a member of Gwynedd Council's Planning Committee. The Member was of the opinion that it was a prejudicial interest, and he withdrew from the room during the discussion on the item.

3. MINUTES

The Chairman signed the minutes of the previous meeting of this Committee held on 5 April, 2017 as a true record.

The Llŷn AONB Service Manager reported that it had not been possible to act on the request of the Joint Committee to the Cabinet Member - Planning and Regulatory that

the constitution of the Joint Committee should be amended to note that seats are distributed among Local Members in accordance with the Council's political balance arrangements and to remove the phrase "Gwynedd Council Members to be rotated following local elections". Consequently, he explained that Gwynedd Council's members on the Joint Committee had been rotated.

A member enquired about the Landscapes of the Future of Wales review. In response, the Llŷn AONB Service Manager noted that the process was continuing and that a report would be submitted at the next meeting to provide members with an update on the review.

4. AONB MANAGEMENT PLAN

Submitted – the report of the Llŷn AONB Service Manager presenting the amended draft AONB Management Plan for the attention of the Joint Committee in accordance with the decision made at the previous meeting to discuss it before holding a public consultation.

It was explained that chapters Part 1 and 2 of the plan had appeared before the Joint Committee for observations over a number of meetings. The complete amended plan before the joint committee included the Action Plan, namely the actions and detailed projects intended to be delivered over the coming years.

The Joint Committee was asked to consider the draft amended Management Plan, suggest changes or improvements and accept the draft amended plan as the basis for public consultation.

It was noted that following the public consultation the intention was to return to the Joint Committee with details of the responses received and recommendations to change the Plan.

Members were given the opportunity to make observations. individual members noted the following main points:

- The need to update information in the Plan;
- A member enquired about the lifespan of the Plan, noting that it was a plan for the period from 2015 to 2020; but that it would not be adopted until 2017;
- Including photographs and graphs in the Plan would liven it up and make it easier to read;
- In terms of tourism figures, the 2011 STEAM figures had been included but the 2015 figures were available. Attention had been drawn at the previous meeting to the fact that the figures were misleading as such a detailed analysis could not be obtained;
- That consideration should be given to making more reference to the Coast Path; it attracted more people to the area and referring to the path would place pressure on the need to invest in other paths, e.g. circular paths;
- That the references made in the Plan to the Joint Local Development Plan (JLDP) should be increased and that reference should be made to Policy AMG1 which referred to the AONB Management Plan;
- Reference was made to a number of studies in the Plan, would it be possible to include a bibliography?
- Botwnnog had not been included on the AONB map;
- It should be noted when wind turbines were discussed that the JLDP placed a 15 metre height restriction and a summary should be included of the number of wind turbines that had been granted planning permission;
- In terms of invasive plants, had Himalayan Balsam (Jumping Jack) been identified?
- Concern about the cumulative impact of demolishing and building a new house as such planning applications were submitted often. Would it be possible for the

Plan to refer to the need to protect houses from being demolished in places such as Abersoch?

- Concern about the cumulative impact of developments and the need to discuss with caravan park owners the way forward in the context of screening and being in-keeping with the area before they ruined the draw that attracted visitors to the area;
- That the Rollback Rights as exist in England should be explored in the context of coast paths falling into the sea - the current process in Wales was long-winded and an all-important resource was being lost. Need to pressurise Welsh Government;
- There was a need to be careful in respect of extending Welsh Government's rights in enforcement on coastal land because of the impact on landowners, including the implications of the responsibilities of accountability and the impact of dogs disturbing stock;
- In the context of policy CP 6 "Promote new affordable homes to meet proven local need, as long as schemes, designs and materials are in-keeping with the AONB's environment", the Council should ensure that the income received as a result of the tax premium on second homes in the area stays in Pen Llŷn to provide affordable housing and provide assistance to young people to buy a house in the area.

In response to the above, the officers noted:

- The content would be updated before the draft plan was released for public consultation;
- That Welsh Government was eager for AONB plans to run in parallel but enquiries would be made about the lifespan of the plan;
- Photographs would be added to the Plan to make it a lighter read and possibly there would be an opportunity to draw-up a concise and easier to read document;
- After receiving observations at the previous meeting, a few changes had been made in terms of tourism figures. The warning about the figures was noted and the information would be updated with the 2015 figures;
- A bibliography would be included;
- That potential projects had been included in the action plan under BP 6 "Target indigenous and non-indigenous invasive species and raise awareness and methods of treatment and eradication". There was a responsibility on landowners to prevent them from spreading; Himalayan Balsam was not included in the Weeds Act 1959;
- That the chapter "Historic Environment" dealt with the need to maintain and protect historic buildings and protect the design and use of suitable materials. Planning permissions were a matter for the Planning Service;
- That the need to carry out research in terms of the cumulative impact of developments could be included in the action plan;
- An action could be noted in the action plan in order to investigate 'Rollback Rights' and contact Welsh Government. Welsh Government was currently undertaking a consultation where reference was made to the coast and extending open land to the coast. As part of the Council's response to the consultation, it was noted that England's experience in the field should be looked at;
- The Joint Committee's request, that the Council use the income received as a result of the tax premium on second homes in the area should be kept in Pen Llŷn to provide affordable housing and assistance for young people to buy a house in the area, would be noted as an action.

The representative of the Campaign for the Protection of Rural Wales noted that he had further observations on the Management Plan and that he would forward them to the Llŷn AONB Service Manager. In response, the Llŷn AONB Service Manager noted that

he would appreciate receiving further observations and he thanked the National Trust Representative for the observations already received.

RESOLVED:

- (i) that the Llŷn AONB Service Manager incorporates the observations of members and further observations of the Campaign for the Protection of Rural Wales Representative in the draft amended Management Plan;**
- (ii) to accept the draft amended Plan as a basis for the public consultation.**

5. PLANNING APPLICATION - THE SHANTY, ABERSOCH

The Llŷn AONB Service Manager noted that this report was being submitted before the Joint Committee at the request of the Chair. It was explained that the planning application for 'The Shanty, Abersoch' (Application no. C17/0159/39/LL) was an application to demolish a house and build a new house in the Area of Outstanding Natural Beauty.

He reported that the AONB Service, in accordance with a service agreement, had submitted observations on the application to the Planning Service. Attention was drawn to the following matters in terms of considering the likely impact on the AONB:

- The site's location on the coast in the AONB.
- The visibility of the site from nearby public viewpoints.
- That there were buildings on the site at present (unlisted)
- The other buildings nearby (size, design, materials)
- The size and design of the proposed new building
- The materials proposed
- Potential impact on views from the Coastal Path above the site

He noted that the planning application had been discussed at a meeting of the Planning Committee on 3 July 2017 where it had been resolved to defer a decision in order to carry out a site visit. Attention was drawn to the fact that the application would be discussed by the Planning Committee on 25 September 2017 following a site visit.

Members were given the opportunity to make observations, individual members noted the following main points:

- The design was not in-keeping historically;
- The house on the site should be protected by moving it to another location due to its importance as a piece of recent history from the 1950s;
- The proposed house would be more visible from the sea rather than from the Coastal Path;
- Concern about the cumulative effect of such developments on the area;
- The proposed house would be approximately twice the footprint of the existing house; therefore, it would be an over-development of a prominent site and would have a visual impact. Abersoch had lost its character due to planning applications that had been granted over the years;
- Not in favour or against the proposal. The Council did not have the money to defend planning appeals and developments brought work to local people. The need to consider the impact of planning permissions to demolish and build a house in the area;
- The proposal was contrary to planning policies as the proposed house did not follow the same footprint;
- That a house similar to the proposed house was located near the site;
- Approving the application would set a precedent and there was a duty on the Joint Committee to object the application.

RESOLVED to submit the following observations for the attention of the Planning Service in relation to the planning application of 'The Shanty, Abersoch' (application no. C17/0159/39/LL):

- **That the Llŷn AONB Joint Advisory Committee objected to the application on the following grounds:**
 - **The proposal would be an over-development of this prominent site with a substantially larger foot print than the present dwelling.**
 - **The development would be intrusive.**
- **That the Joint Advisory Committee was concerned about the cumulative impact of such developments on the AONB.**

6. ELECTING NEW MEMBERS TO THE GRANTS PANEL

Submitted – the report of the Llŷn AONB Projects Officer outlining the background of the Sustainable Development Fund, namely a Welsh Government grant source to the five AONBs in Wales to be allocated to projects with a sustainable nuance in their communities.

She explained that applications from the Fund were assessed according to core environmental, social, economic and cultural criteria.

She noted that the total Fund for this year was £55,000 to each area, and in relation to the Llŷn AONB, there was £32,806 left in the Fund.

She explained that the AONB Unit and the Grants Panel was responsible for the administration of the Llŷn area Fund. She noted that the Grants Panel dealt with decisions on grant applications in excess of £3,000.

The Officer elaborated on the role of the Grants Panel, and explained that new members needed to be elected for the next five years following the elections in May 2017.

In response to a question from a member regarding information about the money already allocated, the Llŷn AONB Projects Officer provided an outline of the projects that had been allocated money from the Fund this year and she noted that she would send the information to the members of the Grants Panel.

RESOLVED:

- (i) To accept the report.**
- (ii) To elect the following members to serve on the Sustainable Development Fund Grants Panel for the next 5 years:**
Councillor Gareth Williams, Eirian Allport, Noel Davey, John Gosling, T. Victor Jones, Morgan Jones-Parry, Sian Parri and Gruffydd Williams.

The meeting commenced at 4.30pm and concluded at 6.20pm.

CHAIR

MEETING	Llŷn AONB Joint Advisory Committee
DATE	December 20 th 2017
TITLE	AONB Management Plan – Proposed Changes
PURPOSE	Consider comments made on revised draft Plan
AUTHOR	Llŷn AONB Service Manager
ACTION	Decide on final changes to the revised Management Plan

1.0 INTRODUCTION

- 1.1 During 2015-2017 work proceeded on reviewing the Llŷn AONB Management Plan. The Plan needed to be revised to conform with the responsibilities of Gwynedd Council in respect of the AONB, as set out in the 2000 Countryside and Rights of Way Act (CRoW Act).
- 1.2 The reviewing process included collating new and most recent information, updating sections of the Plan to conform to recent requirements and undertaking a Screening Assessment. Various aspects of the Management Plan were discussed in many of the JAC meetings.

2.0 CONSULTATION

- 2.1 During the meeting of this JAC held on the 6th of September 2017 it was decided to accept the Plan as a draft version. Also it was agreed for the officers to hold a period of public consultation.
- 2.2 The consultation period began on October 2nd and ended on November 10th. Copies of the Plan were printed and made available in Gwynedd Council Offices, Pwllheli, Neuadd y Dref Pwllheli and Canolfan Congl Meinciau in Botwnnog. E-mails and letters were also sent to inform that the Management Plan had been revised and that there was an opportunity to comment to:
- Relevant members of Gwynedd Council
 - Relevant Community Councils
 - Public and private bodies working in Llŷn
 - Local voluntary organisations
 - Individuals who had shown an interest in the Plan.
- 2.3 Also, as part of the Public Consultation a notice was placed in the local press drawing attention to the opportunity to make comments.

Cambrian News **11th October 2017**
Llanw Llŷn **October 2017**

2.4 Also, information was given via Gwynedd Council website and social media.

3.0 COMMENTS RECEIVED

3.1 Comments were received from a number of different bodies and individuals on the draft Management Plan during the consultation period. Most responses refer to a variety of issues.

3.2 Now, comments need to be considered, as well as causes to make changes to the draft Plan.

4.0 CONSIDERING THE COMMENTS

4.1 Generally, the comments received on the draft Plan can be classed as follows:

- Corrections or suggestions and minor amendments
- Statements of support
- More significant comments, which have more of a bearing on changes to the Plan.

4.2 A summary of main comments have been inputted into a table (**Appendix 1**). The table is laid out as follows:

Column 1 – section of the Plan in question

Column 2 – name of individual or body making comment

Column 3 – a summary of the comments made

Column 4 – response by the AONB Service

Column 5 - recommendation as regards course of action

4.3 The AONB Officer will lead members through the table at the meeting.

4.4 Many of the comments are fair and reasonable and therefore the recommendation made by the AONB Service is to amend the Plan in some way. Only in a small number of cases is the recommendation not to amend the Plan.

5.0 RECOMENDATION

5.1 Consider the information in **Appendix 1** and decide upon final changes to the draft Management Plan.

5.2 Present the Amended Management Plan to the attention of Gwynedd Council's Portfolio Leader with the recommendation that it is adopted by the Council.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
1	PARA 1.5.4	Natural Resources Wales	Another of the Plan's main aims is to raise awareness and promote the AONB's special qualities.	Agree with the comment. Recommendation: Add reference to raising awareness and promoting the special qualities in the paragraph.
2	POLICY CONTEXT	Economic and Regeneration Department	The Rural Development Plan (RDP) gives genuine opportunities to rural communities. Strengthening the connection between the Plan and the RDP should be encouraged following the coming threats and changes due to Brexit.	Agree that the RDP offers substantial opportunities in many areas. Recommendation: Provide more information about the RDP in the Context.
2.1	CONTEXT	Natural Resources Wales	This section contains reviews on acts, strategies and policy documents. The most useful sections shows relations and links to the Plan. This could be developed further to show the importance of all documents and their relevance to the Plan.	The main issues were referred to without going into detail, also the situation changes frequently. This could be considered when the Plan is reviewed again. Recommendation: No Change.
2.2	PARA 2.5.1	Natural Resources Wales	It would be useful to note that the European Landscape Convention has been developed by the European Council.	Agree with the comment. Recommendation: Include the information.
2.3	PARA 2.8	Natural Resources Wales	Update is required to recognise the Common Agricultural Policy and the Rural Development Plan and the significant change following Brexit and the uncertainty this causes to the rural sector.	Agree with the suggestion. Recommendation: Include more information about the CAP, RDP and Brexit.
2.4	PARA 2.17.3	Natural Resources Wales	Sustainable management of natural resources could be included here.	Agree with the comment. Recommendation: Include the information.
2.5	PARA 2.45.5	Natural Resources Wales	Suggestion to replace "well-being of the AONB" with "purpose of the AONB".	Agree with the suggestion. Recommendation: Change wording.
3	PARA 3.1.2	Natural Resources Wales	Suggestion to underline the importance of the basic need for clean air, land and water for human life to continue.	Accept the suggestion. Recommendation: Include reference to this in the paragraph.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
3.1	PARA 3.3.3	Natural Resources Wales	Linking the relation between the AONB and the Ecosystem Services would be useful to show the relevance of the AONB for this to work.	Accept. Recommendation: Include reference to this in the paragraph.
4	PARA 4.10.2	Natural Resources Wales	Attention is given to migration, however the State Report states that the population has increased and it is important to recognise the effects of this on the AONB, as stated more detailed in Section 11.	Agree with the comment. Recommendation: Include more information about migration in para 4.10.1
5	SPECIAL QUALITIES - GENERAL	Natural Resources Wales	It is recognised that many actions deriving from the Special Qualities are in the Implementation Plan but perhaps it would be useful to include more information on how the AONB can help to respond to some of the matters raised in these Sections.	Efforts were made to create a more detailed plan and it is believed that the link between the key issues and the actions are clear. Recommendation: No change.
5.1		Natural Resources Wales	By using sustainable management of natural resources (SMNR), it would also be useful to state the benefits that individuals and communities gain by volunteering and democratically participating through public consultations relating to the AONB, and local events.	Agree with the comments. Recommendation: Include an additional line in the paragraph referring to these matters.
5.2	PARA 5.4.2	Natural Resources Wales	Perhaps include reference to coastal communities restricting the effects of climate change and becoming stronger in terms of dealing with the effects of climate change.	This vision refers to the beauty of the landscape and coast and it believed that reference to coastal communities is not needed here. Recommendation: No change.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
5.3	PARA 5.5.2	Natural Resources Wales	Suggesting to include reference to maintain the very high quality of the water.	Agree with the suggestion. Recommendation: Include reference to maintaining the very high quality of the water.
5.4	PARA 5.6	Natural Resources Wales	More detailed information from the State Report would have been useful to understand the nature and scale of the change in Habitats and Wildlife and understand what needs to be done. Information from the Area Statements could feed into the next review.	Accept the comment for the next review. Recommendation: No change.
5.6	PARA 5.11.1	Natural Resources Wales	Stated is the aim to improve opportunities for those with disabilities by 2040 - but milestones in terms of reaching this aim should be stated much sooner than that.	2040 derives from the main aim and is mis-leading here. Recommendation: Remove reference to 2040 from this sentence.
6	PARA 6.1.8	Natural Resources Wales	More information is available on the Pen Llŷn a'r Sarnau SAC that would be relevant for considering any proposals that could effect the SAC or the AONB.	Agree. Recommendation: Include a link to the Pen Llŷn a'r Sarnau SAC website.
6.1	PARA 6.6.1	Natural Resources Wales	It is important also to state the need to maintain and promote the link between habitats.	Accept the comments. Recommendation: State the importance of the links between habitats in this Section.
6.3	PARA 6.9.2	The Campaign for the Protection of Rural Wales	More should be done of the cable undergrounding work on Bwlch yr Eifl - one of very few examples of improving the landscape in the AONB.	Agree - this could be referred to in others plans. Recommendation: Include more information about cable undergrounding plans in the paragraph.
6.4	PARA 6.12.2	Natural Resources Wales	Suggestion to state the uncertainty in terms of agri-environment schemes, the Rural Development Plan and Brexit.	Accept the comments. Recommendation: Include a sentence about this in the paragraph.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
6.5	POLICY TP2- RESIST DEVELOPMENTS THAT WOULD IMPACT THE LANDSCAPE.	Natural Resources Wales	Reference could perhaps be given to reducing the effect of current developments in this policy.	Policy TP 5 refers to untidy and intrusive sites and buildings. Recommendation: No change.
6.6	POLICY TP3 - PROTECT LLŶN'S SPECIAL COAST	Natural Resources Wales	Suggestion to include the word "unsuitable" in terms of developments that would match Planning Policy Wales.	Agree with the suggestion Recommendation: Change the policy by changing the word "significant" with "unsuitable".
6.7	POLICY TP9 - WITHSTAND THE DEVELOPMENTS OF NEW CARAVANS AND EXTENSIONS TO CURRENT SITES IN PROMINENT LOCATIONS ON THE AONB'S LANDSCAPE AND COAST.	Mr Peter Hewlett	The draft wording could be said to imply that new caravan sites and extensions to existing caravan sites are OK providing only that they are not "prominent on the landscape or coast". What does "prominent" mean? It is open to endless subjective opinions and, as such, could render the Policy useless as a means of preventing caravans wrecking the landscape, a possibility to which this Draft Report, to its considerable credit, draws attention. The policy should say "Oppose new caravan developments and extensions to existing sites in and around the AONB and to promote the landscaping of existing sites."	The Plan recognises that caravans can have an effect on the area's landscape and views and it is agreed that this kind of pressure has recently increased. As a result, a review is recommended into the area's caravans in 2019 as an addition to the Plan. But it must be accepted that caravans are an important source of income and method of diversification. Also, applications will be decided upon on the basis of the Local and National Planning Policies. It is believed that it is important to weigh up each application carefully and oppose unsuitable sites. Suitability could be measured by how prominent they are on the landscape, public access, access, local designations and any other relevant information. Recommendation: No change.
7	TRANQUILITY AND LOW POLLUTION - MAIN AIM	Natural Resources Wales	Would "tranquillity" be more suitable than "security"?	Agree, this is a mistake. Recommendation: Change "Security" to "Tranquillity".

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
8	PARA 8.1.6	Natural Resources Wales	This needs to be updated in terms of public authorities's new responsibilities for biodiversity and ecosystems - section 6 The Environment Act (Wales) 2016, as well as clear statements to protect designated sites.	Agree that information should be updated. Recommendation: Include the information about the Wales Environment Act and relevant responsibilities.
8.1	PARA 8.2.2	Natural Resources Wales	When woodlands are located on NRW owned land, it is important for the AONB to input to prepared Forestry Resources Plans.	Agree. Recommendation: Enquire with NRW if there are woodlands located in the AONB and change paragraph to reflect
8.3	POLICY B1 - HABITATS	Natural Resources Wales	Suggestion to combine with Policy B3 to strengthen the wording.	Comment noted, but it is believed that it would be better to keep both policies separate. Recommendation: Strengthen the wording of Policy BP 1 to include additional clause in Policy B3.
8.3	POLICY B1 - HABITATS	NRW - Environmental Assessment Section	It is suggested to change the reference to the condition of sites "satisfactory" to "favourable" in order to ensure consistency with the language used in site monitoring.	Agree with suggestion. Recommendation: Include the word "favourable" instead of "satisfactory" in the policy.
8.4	POLICY B1 - HABITATS	NRW - Environmental Assessment Section	Recommend to include a safeguarding step under the policy: "All proposals should show how they avoid harmfully effecting single European sites and SSSI's, and on the coherence of the network as a whole".	This could be included in the policy explanation. Recommendation: Include the safeguarding step in the BP 1 policy explanation.
8.6	POLICY BP 3 - SPECIES	NRW - Environmental Assessment Section	It is suggested to change the reference to the condition of sites "satisfactory" to "favourable" in order to ensure consistency with the language used in site monitoring	Agree. Recommendation: Include the word "favourable" instead of "satisfactory" in the policy.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
10	THE WELSH LANGUAGE AND CULTURE - GENERAL	Natural Resources Wales	The Welsh Government's policies can be referred to e.g. A Living Language 2012-17 and Taking Wales Forward 2016-2021 with the target of 1 million speakers.	Agree. Recommendation: Include reference to these matters in the Introduction.
10.1	THE WELSH LANGUAGE AND CULTURE - GENERAL	Natural Resources Wales	Landscape, wildlife and places to visit are a resource to maintain the Welsh language by names of locations, wildlife and vegetation. There is also a connection with rural skills e.g. farming, land management etc. Many of these terms, in Welsh and English, are being lost.	This is true and the AONB Service have developed projects to record information about fields, wells and the coast. Recommendation: Include reference to the importance of maintaining names of activities and skills in the Plan.
10.2	THE WELSH LANGUAGE AND CULTURE - GENERAL	Natural Resources Wales	Support for the agriculture industry and nurturing entrepreneurship will be important for rural communities following Brexit to maintain Welsh speakers.	Agree with the comment. The Plan aims to support rural agriculture and communities, and there will also be other supportive measures from the Council. Recommendation: No change.
10.3	THE WELSH LANGUAGE AND CULTURE - GENERAL	Natural Resources Wales	The AONB is very well placed to reach new audiences and sporting organisations to promote the Welsh language in their activities as well as support digital and technical medias.	Interesting comment - most sporting and social organisations in the area already use the Welsh language. Recommendation: No change.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
11	PEOPLE AND COMMUNITIES - GENERAL	Natural Resources Wales	There is support for this part and the link with the aims of the Well-being Act - but would like to see more link between well-being and the AONB's work. The Designated Landscapes have a unique part to play in terms of mental health and illness prevention. It is important to pay attention to this in the Plan and make connections between managing natural resources (clean air, water and productive land), wildlife, tranquillity, pollution, climate change, communities, social involvement, leisure, access and supporting the local economy.	Agree that the AONB has a large part to play in terms of health, emotional and physical wellbeing and illness prevention. Recommendation: Include more background in terms of the health and well-being benefits that the AONB could offer, in this Section.
11.1	POLICY GP6: PROMOTING AND ASSISTING CO-OPERATIVE INITIATIVES	Community Regeneration Officer	Suggest change from "CO-OPERATIVE" to "SOCIAL" as this covers more organisations.	Agree that this is a more suitable term. Recommendation: Change "Co-Operative" to "Social".
12	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Economic and Regeneration Department	The Department has developed and implemented schemes that support young people to venture in business and stay in their square mile. Is there a chance through the Plan to support the importance of the young generation to stay in Llŷn and the support for schemes that encourage the creation of high value jobs?	The Plan recognizes the importance of young people to the community and area, and it is agreed that high value jobs are important in this regard. Recommendation: Include information on High Value Jobs schemes and the contribution they could make to help young people stay in the area.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
12.1	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Economic and Regeneration Department	Strengthening digital connections is essential to a rural area. We welcome developments in the digital field so that residents can access high value jobs. We would be keen to see that happening in the most sensitive way to the local environment and the AONB.	It is acknowledged that the digital field offers opportunities for a rural area such as Llŷn and that there is not much stated about this in the Management Plan. Recommendation: Include more information about the digital field and the opportunities that derive from it.
12.1	POLICY GP 1 - PROMOTE THE FARMING INDUSTRY BY MARKETING VENTURES AND DEVELOPING TRADITIONAL RURAL SKILLS	Natural Resources Wales	Other Welsh AONBs have succeeded to develop rural skills plans with other colleges or the Snowdonia National Park. This links with Policy TP 4.	This has been recognised as an action and Policy in the Plan. Recommendation: No Change.
12.11	POLICY GP 9 - LEISURE DEVELOPMENTS	NRW - Environmental Assessment Section	It is also suggested that there should be a clear reference to "other protected sites".	Agree with suggestion. Recommendation: Include "or other protected sites" at the end of the Policy.

SECTION OF THE PLAN		COMMENTS BY	SUMMARY OF COMMENTS	AONB SERVICE RESPONSE
12.2	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Economy and Regeneration Department	<p>The tourism industry is important in Llŷn and the influence of the industry is great on the economy and environment of the area. Is it possible to increase tourism status within the Plan?</p> <p>Its influence is obvious on issues such as the environment, infrastructure, services, communities and there is an opportunity through the Plan to work together to identify priorities and in turn, plans that could strike a balance between development and protection. Although challenging, it is considered beneficial to discuss the opportunity to increase visitor spending and extend the season in the area in a sustainable way which protects the environment.</p>	<p>Agree that the industry brings income and work and has a significant influence on the area.</p> <p>Recommendation: Include more information about financial contribution and tourism jobs in the Plan and give greater consideration to the opportunities and side effects of the proposed Sustainable Tourism Strategy.</p>
12.3	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Tourism and Marketing Service	The importance of the sector to the coastal community is not highlighted. Emphasis is placed on the implications and difficulties.	<p>As noted above, it is intended to include more information on the economic constraint of tourism and to look more closely at the issue in the Strategy.</p> <p>Recommendation: Change as above.</p>
12.4	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Tourism and Marketing Service	The importance of events and the National Coastal Path needs more attention.	<p>Coastal Path receives much attention but not many events.</p> <p>Recommendation: Include more information about events within and nearby the area and the opportunities for producers.</p>

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12.5	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Tourism and Marketing Service	A greater link is needed with the Well-Being Act in terms of the Leisure and Tourism field.	Agree. Recommendation: Include reference to the Future Generations Well-Being Act 2015 in this Section.
12.6	LOCAL PRODUCE AND RURAL BUSINESSES - GENERAL	Tourism and Marketing Service	The Wales Way – an Economic Regeneration scheme by Welsh Government for the next 10 years with Visit Wales leading. The Coastal Way starts at Aberdaron and end at St. David's.	This is a new scheme by Welsh Government. Recommendation: Include information about The Wales Way scheme in this Plan.
12.7	PARA 12.2.1	Natural Resources Wales	It is considered beneficial to refer to the maintenance of local breeds such as the Llŷn step because they help maintain the character and mood of the area.	There is a variety of cattle and sheep breeds in the area and Llŷn sheep are now popular in many areas. Recommendation: No Change.
12.8	PARA 12.8.1	Natural Resources Wales	It would be useful to include information about the importance of jobs in the public sector here.	Agree it would be useful to include additional information. Recommendation: Include information on the importance of the public sector in the paragraph.
12.9	PARA 12.8.1	Natural Resources Wales	Is seasonal employment therefore a matter to refer to it as a consideration?	Reference can be made to the seasonal nature of jobs in the tourism field. Recommendation: Add information about this in the paragraph.

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13	RIGHTS OF WAY AND ACCESS - GENERAL	Natural Resources Wales	Open Access Land, including Common Land, designated under the CRoW Act 2000 is important access land associated with Rights of Way and the Coast Path. There may be places where new paths can be created to create access to these lands. There is also room to raise awareness of these routes of great importance and the information needs to be communicated in ways other than OS maps e.g. electronic maps and apps.	The AONB Service is supportive of new routes to connect with access land and have contributed to fund such routes. It is also agreed that it would be good to raise awareness of them through various methods. Recommendation: Include an additional action referring to the creation of new connective pathways to access land and digital awareness raising and through Llygad Llŷn.
13.2	PARA 13.1.8	Natural Resources Wales	It would be useful to emphasize the link with the Llŷn Landscape Partnership e.g. practical work to improve routes and links with the Llŷn Ecoamgueddfa.	Agree. Recommendation: Refer to the issues in the Introduction as work already done and opportunities for the future
13.3	PARA 13.11.2	Natural Resources Wales	In reviewing the Rights of Way Improvement Plan consideration needs to be given to how RoW will be managed in the future, especially in relation to priorities and available resources. It will not be possible to realize the RoW vision without other resources or business plan. Because significant parts are not in "consistent" use, there is a danger to their status due to the current criteria.	A fair point, that will be forwarded to the Rights of Way Unit for further consideration. Recommendation: No Change.

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13.4	PARA 13.11.2	Natural Resources Wales	The establishment and development of a volunteer group to undertake a part of the work that is beneficial for health, contribution, community and the Welsh language is supported but that can not be sufficient enough to prevent the loss of important parts of the network.	Agree with comments - forward them to the Rights of Way Unit. Recommendation: No Change.
14	IMPLEMENTATION PLAN - GENERAL	Economic and Regeneration Department	Collaborating on realizing parts of the Action Plan is welcomed. It is considered that it would be of benefit to refer to how the AONB will contribute to the management of tourism in the area and the plethora with the Destination Management work and the Council's Strategic priorities.	An action has been identified under Policy GP 10 stating "Commissioning and publishing a Sustainable Tourism Strategy for Llŷn and the AONB". Recommendation: Include more information on destination management and place the Economy and Regeneration Department as a partner in terms of the Sustainable Tourism Strategy.
14.1	PARA 14.1.3	Natural Resources Wales	The reference to assessing the success of the previous Plan is welcomed but believe that more information can be given to see what was effective, what did not work and why.	More information could be included. Recommendation: Include more information about the previous Management Plan's successes in the paragraph.
14.2	PARA 14.2.1	Natural Resources Wales	The importance of engaging with relevant sectors in the development of the Plan is recognized, to have ownership and a commitment to cooperate and realize relevant parts.	Agree with comment. Recommendation: Include reference to engagement and consultation.
14.3	PARA 14.2.4	Natural Resources Wales	The Fund's projects associated with the Plan could be highlighted to show the contribution the Fund can make to deliver key priorities.	Agree. Recommendation: Include information on some successful projects in the paragraph.

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14.4	IMPLEMENTING - POLICY TP 9 - CARAVANS	The Campaign for the Protection of Rural Wales	It is believed that an action to accompany the statement in para 6.13.2 (a detailed assessment of caravans in the AONB) is required to provide evidence in the case of applications for new sites and extensions, the cumulative impact on the landscape and also to strengthen the planning policy.	A reasonable and fair point. Recommendation: Include an additional action under the policy stating that it is proposed to carry out a survey of caravans in the Llŷn and AONB area in 2019. Lead partner: Gwynedd Council
14.5	IMPLEMENTING - POLICY TP 9 - CARAVANS	Natural Resources Wales	This can be strengthened by working with relevant partners to monitor if sites comply with the rights.	Agree. Recommendation: Include an additional action referring to the monitoring of caravan sites and identifying Gwynedd Council as a lead partner.
14.6	POLICY PP2 - WATER AND SOIL	Natural Resources Wales	The work done by NRW could be referred to in relation to water and soil.	Accept the comment. Recommendation: Include this as an action point.
14.7	POLICY BP3 - SPECIES	Natural Resources Wales	NRW would be grateful to give input to the project of reintroducing the red crayfish and increasing otters in the area and the Marine Code is supported.	Appreciative of the support and interest. Recommendation: State NRW as project partners.
14.8	POLICY BP6 - INVASIVE SPECIES	Natural Resources Wales	NRW is involved in a comprehensive work program for invasive species (INNS) funded by the Welsh Government. It would be beneficial for the Llŷn AONB and relevant departments of Gwynedd Council to link with this if it was not already done.	Useful information. Recommendation: Refer to this is in the Implementation Plan.

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14.9	IMPLEMENTING POLICY HP6: ACCESS TO LOCAL HISTORIC RESOURCES	Community Regeneration Officer	Suggest an additional action: Provide support to target sources of support and funds. Partners - Community Regeneration Service and others.	Agree with the suggestion as it would strengthen the Plan and reflect the work done. Recommendation: Set additional action under Policy HP 6.
14.1	IMPLEMENTING POLICY CP1 - COMMUNITY FACILITIES	Community Regeneration Officer	Suggest an additional action: Promote the sustainability of community resources by developing services that respond to local opportunities. Partners: Community Regeneration Service.	Agree, it would strengthen the Plan and reflect the work done. Recommendation: Set additional action under Policy CP 1.
14.11	POLICY MP 3 - PROMOTE THE USE OF LOCAL CIRCULAR ROUTES	Natural Resources Wales	With a shortage of resources it would be useful to look again at work already done e.e Coastal Circular Routes linking to the Coast Path and promote cycling facilities developed in 2004 as well as promoting the area due to the Llŷn Cycling Sportif.	The AONB Service has collaborated on the coastal circular routes and awareness raising, re-launching the bike trips in 2017 and sponsoring the Bike Sportif. Recommendation: No change.
14.12	POLICY MP7- PROMOTE SUSTAINABLE TRAVEL	O Ddrws i Ddrws	The Policy and the act of "Running and promoting the Llŷn Coastal Bus service" is supported. That will mean that an application for resources to run the innovative service will be made when submitting a budget for the Llŷn AONB over the next few months.	The comment and support of the Policy are noted. However, this is an O Ddrws i Ddrws initiative and the fact that there is reference to the Coastal Bus does not mean that the AONB Service will apply to fund it. Recommendation: No change.
15	PARA 15.2.1	Natural Resources Wales	Presenting a Progress Report should form a part of updating NRW on developments in terms of Partnership Budgets and end of year reports.	Agree. Recommendation: Change paragraph to refer to this.

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15.1	PARA 15.6.1	The Campaign for the Protection of Rural Wales	The JAC could be more effective / active in monitoring the Action Plan and the policies consistently; this could make it easier to update the Plan.	The AONB service can regularly report back to the Joint Committee. It is not believed that the paragraph needs to be changed. Recommendation: No change.
16	SCREENING REPORT	NRW - Environmental Assessment Section	Strategic Environmental Report (SEA) - it is accepted that the proposed changes in this review are not likely to have a significant impact on the environment.	Accept the comment. Recommendation: No change.
16.1	SCREENING REPORT	NRW - Environmental Assessment Section	It is likely that full SEA will be required for the next review of the Plan.	Accept the comment. Recommendation: No change. To be considered in the next review.
16.2	SCREENING REPORT	NRW - Environmental Assessment Section	Habitats Regulations Assessments (HRA) - The conclusion of no significant effects will be agreed if HRA assessments are carried out at lower tier scheme or project level level. This should be noted in the HRA.	It is agreed that there are cases where it is difficult to measure the impact of a plan or project at a top tier level. Recommendation: Adapting the Screening Report to reflect the situation and include reference to this in the Management Plan.
16.3	SCREENING REPORT	NRW - Environmental Assessment Section	Table 1 -it is suggested that the effect of some policies is uncertain at this level and that should be shown in the table and indicate that an ATM will be required at a lower tier level or project.	Accept. Recommendation: Adapt the Screening Report to reflect this.
17	GENERAL	The Campaign for the Protection of Rural Wales	It is understood that the end version will include pictures, graphs, maps, etc. An opportunity to comment on these would be welcomed.	The normal procedure is to delegate the right for officers to decide on these matters. Recommendation: Include pictures, maps and graphs in the final Plan as intended.

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17.1	GENERAL	The Campaign for the Protection of Rural Wales	It is understood that a summary version will be prepared and this is welcomed. We would welcome the opportunity to comment.	Agree. Recommendation: No change to the Plan but bring the concise version to the JAC for comments
17.2	GENERAL	The Campaign for the Protection of Rural Wales	A checklist / bibliography, footnotes and reference to web sites would be useful.	There is intention to include this. Recommendation: Include checklist / bibliography, footnotes and references to web sites as intended.
17.3	GENERAL	Natural Resources Wales	The State of the AONB Report contains useful information to provide the basis for the Plan. However it is considered that it would be more effective to strengthen some areas: lack of information on the state of biodiversity, more information about the fishing industry, listed buildings, tourism, water quality, climate change and most specifically health and well-being - where it is believed that AONB has an important role to play.	The State of the AONB Report was commissioned by the LUC on behalf of the Designated Landscapes of North Wales. It is accepted that there are some weak points and this can be rectified for the next review of the Plan. The AONB Service also has additional background information that is not included in the Plan and it is intended to include this in a document on the web site. Recommendation: No Change but note these comments for the next review.