

AONB Joint Advisory Committee's comments on the Joint Local Development Plan (Deposit Draft)

Rep ID	Name	Section	Type	Summary of Representation/ Change(s) to plan	Comments and recommendations of officers
943	AONB Joint Advisory Committee	POLICY PCYFF2	Object	I believe there should be specific reference to standard design that corresponds to the context of the AONB.	<p>Not accepted</p> <p>The special landscape features of AONBs in the Plan Area are protected via Strategic Policy PS16 and national policies and legislation as outlined in table 23. Nonetheless it is considered that Policy CYFF3 would benefit from reference to reference to “or other detailed assessments adopted by the Local Planning Authority” to reflect the publication of an assessment of features that may be specific to the AONBs, which would be a material planning consideration.</p> <p>Recommendation</p> <p>No change is required to Policy PCYFF2. Amend Policy PCYFF 3 as referred to above.</p> <p>Focussed Change NF31</p>
950	AONB Joint Advisory Committee	POLICY ADN1	Object	<p>I believe that the current policy of having no turbines in the AONB (C26) should be adhered to.</p> <p>Also, refuse turbines higher than 11m within visibility of the AONB.</p> <p>The term 'turbine' should be used, rather than 'mill' which is different.</p> <p>I believe that criterion 2 should refer to safeguarding the setting of the AONB.</p> <p>There is concern about the categories</p>	<p>Accepted in part - Accept that the reference to 'melinau' in the Welsh version should be amended to 'tyrbinau'.</p> <p>From reviewing the Landscape Sensitivity and Capacity Assessment study it is clear that when referring to Landscape Protection the setting of the AONB and SLA is listed in addition to the setting of the National park and World Heritage Site. In light of this it is recommended that the wording</p>

				<p>and designating developments under 5MW as 'Small'.</p>	<p>within the policy is amended through including reference to the setting of the AONB and SLA in criterion 2 & 3. The evidence base to the Deposit Plan within the Landscape Sensitivity and Capacity Assessment (2014) study assesses the appropriateness of different types of turbine typology in different parts of the Plan's area. It concluded that proposals for domestic scale development (up to 15m to the blade tip) could be supported in the AONB and SLA provided criterion (i) to (vii) are satisfied. The height used within the policy is consistent with what is included in the 'Landscape Sensitivity and Capacity Assessment' Background Paper. An assessment is included in this topic paper about the suitability of different heights within the different landscape character areas. Therefore, the policy reflects the evidence base in the background paper and the different typology that could be considered within landscape character areas within the area of the Plan. Introducing different heights within the policy would mean that the Plan would not have a robust evidence base to justify limiting the size of developments within different sub-areas within the area of the Plan.</p> <p>Recommendation</p> <p>The term 'tyrbinau gwynt' replace 'melinau gwynt' in the Welsh version and that criterion 2 & 3 contain reference to the setting of the</p>
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					AONB and SLA. Focussed Change NF35, NF36 Minor Change NB5, NB6, NB7
944	AONB Joint Advisory Committee	POLICY ADN2	Object	Other Renewable Energy Technology. It is believed that this policy is too indefinite in terms of proposals outside development boundaries, and that it should be strengthened.	Not accepted - it is believed that the policy in its existing form strikes a balance by promoting developments within the development boundary whilst supporting other suitable developments where there is appropriate justification for these outside the development boundary. Recommendation Robust evidence was not received to justify amending the Deposit Plan in order to ensure the soundness of the Plan. No Change
782	AONB Joint Advisory Committee	POLICY TWR3	Support	This policy is supported as it is proposed to refuse new sites and extensions within the AONB and the SLA. We believe that priority should be given to monitoring compliance with planning permissions, planning conditions, landscaping conditions and conditions on occupancy.	Note the Support Recommendation No change
783	AONB Joint Advisory Committee	POLICY TWR4	Object	There was concern about allowing static caravan/chalet sites to remain open for 12 months a year. There are insufficient resources to be able to monitor the situation and people could live permanently in the units - without paying tax.	Not Accepted National policy guidance supports a year round holiday season. PolicyTWR4 contains robust criteria in order to ensure that the accommodation is being used solely for holiday purposes and does not become the occupant's main or sole place of residence. Recommendation No robust evidence was submitted which would justify amending the Deposit Plan to

					ensure the Plan's soundness. No Change
784	AONB Joint Advisory Committee	POLICY TWR5	Object	Members had noticed an increase in applications and considerable pressure from this type of development in the Llŷn area. We questioned whether there was a basis for the policy and had an analysis been made of the increase in units/the effect of new developments? We believe the policy should be more restrictive within and near the designated area. We believe that priority should be given to monitoring compliance with planning permissions, planning conditions, landscaping conditions and conditions on occupancy.	Not Accepted Touring caravan and camping sites, are considered more acceptable in land use planning terms as having less of an impact on the landscape than static caravan and chalet sites because, by their very nature, they have transient features which do not impose permanent, year round effects on the local landscape. The plan recognises that heavily pressured exist in many communities located on or near the coast, including extensive parts of both AONBs. The Councils will require strong evidence that proposals for further units of accommodation in such areas will not add to servicing problems or harm the character or natural resources of these areas. Recommendation This proposed change is not required to ensure the soundness of the plan. No Change
837	AONB Joint Advisory Committee	STRATEGIC POLICY PS15	Object	New housing. There was concern about the level of housing provision in the Llŷn area and the possible impact that could have on the community and the well-being of the Welsh language. There was specific concern about the provision for Botwnnog and Pwllheli, which seems excessive considering these settlements' size and character.	Not accepted - The distribution strategy was established in the first place during the process of developing the Preferred Strategy of the Plan on the basis of evidence and public participation. In spatial terms the strategy is to ensure that the detailed and strategic policies of the Plan promote developments that address the expectations of the Vision and Strategic Objectives of the Plan. It would also ensure that the Council

					<p>meets national expectations in promoting sustainable development. In this regard, PPW (Part 9.2) notes that the development plans need to provide a framework that will stimulate, guide and manage change towards a more sustainable pattern of development. Need to find a sustainable settlement network, which meets the requirements of the economy, the environment and health while respecting local diversity and protecting the character and cultural identity of the communities. The Deposit Plan identifies a Hierarchy of towns and villages with a specific role and function. A methodology has been developed and published to identify the settlements on the basis of their role, function, range and choice of facilities and services in Topic Paper 5 Developing the Settlement Strategy. The Welsh language has been a consideration in formulating the vision, objectives, strategies and policies of the Plan since its inception. The potential effects of the Plan on the Welsh language were considered during the Sustainability Assessment process (including the SEA), which was informed by a Language Impact Assessment. Attention should be given to the various policies of the Plan and topic documents, as well as the SPG for: planning obligations, maintaining and creating sustainable communities, affordable housing, the type and mix of housing, and development briefs.</p>
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					<p>The spatial strategy will ensure that development is directed to locations that are sustainable in terms of size, function, character, facilities, transport links, social and environmental inclusion. Therefore there will be a sustainable pattern of settlement with viable communities.</p> <p>Recommendation</p> <p>There was no compelling evidence to justify amending the Deposit Plan in order to ensure the soundness of the Plan.</p> <p>No change</p>
805	AONB Joint Advisory Committee	STRATEGIC POLICY PS16	Object	AONB Management Plan - this is a statutory plan and it is believed that reference should be made to it in the relevant policies.	<p>Accepted – Paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other legislative regimes.” The existing legislation and national policy and guidance in respect of AONB’s is outlined in Table 23 of the LDP. Nonetheless, it is considered that the Plan would benefit from amendments that draw attention to the need to consider the relevant AONB Management Plans at a planning application stage.</p> <p>Recommendation</p> <p>Amend paragraph 7.5.13 to refer to the AONB Management Plans. Also include an additional Policy to require consideration of</p>

					the Management Plans at the planning application stage. Focussed Change – NF 82 & NF 85
806	AONB Joint Advisory Committee	STRATEGIC POLICY PS16	Object	AONB - there is no specific policy in terms of maintaining and safeguarding the AONB. Rather, there are general policies and a reference to national legislation and policy. It is believed that a specific policy is required to maintain and retain the AONB, similar to Policy B8 in the current plan.	Not accepted – Criterion 2 of the Policy covers proposed development within the AONBs. Additionally, paragraph 2.2.4 of PPW states that “National planning policy set out in Planning Policy Wales should not be repeated as policy in LDPs but plans should explain how it will apply to the local area, critically how national and local policy will work together. Furthermore, paragraph 2.2.5 of PPW notes that “Plans should not duplicate provisions in other legislative regimes.” The existing legislation and national policy and guidance in respect of AONB’s is outlined in Table 23 of the LDP. Recommendation No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan’s soundness. No Change
808	AONB Joint Advisory Committee	POLICY AMG1	Object	In some places, this area (Western Llŷn SLA) abuts the AONB and protects the setting of the AONB. However, some parts of the AONB are not protected in this way. Therefore, it is believed that reference should be made to safeguarding the setting of the AONB in the relevant policies.	Not accepted - Reference to issue is made in the last sentence in policy AMG2 which states that “Additional consideration will also be given to developments which directly affect the landscape character and setting of the AONBs or the National Park”. However, it is noted that there is an error in the Welsh version and that ‘yn uniongyrchol’ should be included after “effeithio” in the last sentence of policy AMG2 in order to be consistent with the English version. NB 18 (Welsh v only)

809	AONB Joint Advisory Committee	POLICY AMG2	Object	It is a praiseworthy but slightly complicated policy, and it is believed that it could be difficult to put into operation.	<p>Not accepted - it is considered that the policy is sufficiently clear in meaning and capable of being implemented. Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>
810	AONB Joint Advisory Committee	POLICY AMG3	Object	The Heritage Coast is a local designation that largely follows the AONB's coastal boundary in Llŷn. It is believed that this policy should reflect the designation in a more positive manner through further conserving the HC.	<p>Not accepted - it is considered that the importance of the Heritage Coast is adequately covered in policy AMG3 and paragraph 7.5.17.</p> <p>Recommendation</p> <p>No robust evidence was received which would justify amending the Deposit Plan to ensure the Plan's soundness.</p> <p>No Change</p>