

Denbighshire County Council

Draft Supplementary Planning
Guidance Note:
Clwydian Range and Dee Valley
Area of Outstanding Natural Beauty
(AONB)

Consultation report, including summaries of
representations received and the Council's
responses

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1. Background

- 1.1 This report complements the draft Supplementary Planning Guidance (SPG) note 'Clwydian Range and Dee Valley Area Of Outstanding Natural Beauty (AONB)' which will be submitted to Denbighshire County Council (DCC) Planning Committee when considering adoption of the draft SPG (hereafter referred to as draft document) on 18th April 2018. It outlines actions and events carried out by the Council as part of the 10 week public consultation, and, importantly, lists proposed changes to the draft document.
- 1.2 Supplementary Planning Guidance should only be adopted by a local planning authority and, hence, regarded as a material consideration in determining planning applications if it has been subject to public consultation. This report accordingly demonstrates compliance with Planning Policy Wales Edition 9, paragraph 2.3.4, and Welsh Government LDP Manual 2, paragraph 7.3.1.

2. Principles of public consultation

- 2.1 Denbighshire County Council, Flintshire County Council and Wrexham County Borough Council have worked jointly to produce the draft document for the Clwydian Range and Dee Valley AONB. The aim is to provide consistent guidance for prospective applicants in all three local authorities. It was therefore essential to carry out a joint public consultation, too.
- 2.2 Public consultation ran from 20th November 2017 to 29th January 2018 for a period of 10 weeks, which was two weeks longer than the usual consultation period of 8 weeks. It was deemed appropriate to allow an extension for the festive season. This approach allowed additional time for individuals and businesses to submit their views and comments by the deadline.
- 2.3 Planning Officers and representatives from the AONB were available to answer questions from members of the public and private businesses at two drop in sessions. They were held at Loggerheads Country Park on the 6th of December 2017 and on the 18th of January 2018.

- 2.4 The draft document was available for viewing on the websites of all three local authorities. Hardcopies were also made available at all libraries and one-stop-shops in Denbighshire, County Hall in Mold, and at Contact in Wrexham.
- 2.5 All City, Town and Community Councils were consulted along with key stakeholders. Besides public notification on the three Councils' webpages, people registered on the local planning authorities' planning-related databases for example, members of the public included in the Denbighshire LDP database, were notified by email or letter.
- 2.6 Comments were invited in writing to Flintshire County Council who were coordinating the consultation on behalf of the three local planning authorities. Using a single point of contact assisted members of the public in only having to submit their representations to one of the three authorities. Notwithstanding, the consultation letter contained contact information for Denbighshire County Council where Planning Officers dealt with queries relating specifically to the County area.

3. **Two drop in sessions at Loggerheads Country Park**

- 3.1 There were two public consultation events/ drop in sessions at Loggerheads Country Park (Denbighshire) during the 10 week consultation period: (1) 6th December 2017 [10am to 2pm] and (2) 18th January 2018 [2pm to 6pm]. These events were attended in total by 25 members of the public.
- 3.2 At both events, a brief summary of the consultation document with maps were provided on 8 large display boards, 4x Welsh/ 4x English. The public had also the opportunity to obtain a hard copy. Officers were present to brief the public, answer questions, and deal with queries. An A0 map of the Clwydian Range and Dee Valley AONB was placed in the middle of the room. The intention was to encourage interaction with people that generally have a view on the matter but do generally not engage in the process for several reasons. This offer was taken-up by many visitors; expressing their opinion.

4. **Representations**

- 4.1 For ease of reference and identification of matters raised, individual representations were subdivided into individual comments. Accordingly, the number of comments (41, including Officers' proposal) surpasses the number of representations (15). None of the submitted representations were received in Welsh.
- 4.2 The following paragraphs discuss the principal topics that could be identified in the representations received by the Council. Despite the fact that selected topics are highlighted in this section of the report, all comments have been dealt with in the same manner, importance and diligence.

4.3. Table 1 contains a summary of every representation and its comments; including a Council's response and, where applicable, proposed changes to the draft document are outlined. All original representations are available for interested parties to view in full at the Council offices at Caledfryn, Denbigh.

4.4 *Light pollution*

4.5 Concern was raised about the lack of reference to light pollution in view of recent assessments that were conducted to test the feasibility of gaining Dark Sky status. It was felt necessary to provide further planning guidance on that topic, especially brightness and light fittings, to avoid an 'urban feeling' of lighting in the AONB at night.

4.6 The Denbighshire Local Development Plan 2006 – 2021 (LDP), Policy RD 1, provides the local policy basis for assessing development proposals that are likely to affect the amenity of local residents or the characteristics of the locality by virtue of light pollution. Furthermore, draft AONB SPG paragraph 37 provides design considerations for the installation of lighting facilities – either within or in the vicinity of the AONB.

Design guidance

4.7 Design considerations are at the heart of the SPG so any comment was carefully considered and, where appropriate, changes were proposed to have regard to them. There was no specific element which was highlighted in the representations but a wide range of design topics such as; key characteristics of the built environment and listed buildings.

4.8 The principal challenge with regard to design is striking the balance between duplicating the content of many (third parties') guidance documents and providing sufficient document references to enable the audience to understand the design context. Whilst minor amendments for improving the understanding of the points raised in the document were easily accommodated, the reader may have to refer to alternative SPGs when drafting their development proposal, for example: Denbighshire County Council 'Listed Buildings' and 'Residential Development'. The draft AONB SPG specifically highlights in paragraph 4 the need to read the document in conjunction with other SPG's.

Document layout & design

4.9 Members of the public did not always agree with the pictures chosen to highlight individual design aspects. It was also remarked that the general formatting and legibility of the document could be improved to be more user-friendly. Further efforts were to be put into proofreading to eliminate errors prior to formal adoption.

4.10 Officers acknowledge the fact that the legibility of the document can be improved which is going to take place after the local planning authorities have reached an agreement on the text. Individual photos may be replaced as part of finalising the adopted document.

5. **Changes proposed to the draft document**

5.1 The purpose of the public consultation was to seek input from the local communities, key stakeholders and the public into the draft AONB SPG prior to requesting document adoption. Responding to the received responses (see section 4) the following principal changes are proposed as set out in Table 2. Every single proposed change can be viewed in the amended draft document. It is shown as **highlighted** for text additions or ~~striketrough~~ for text deletions.

5.2 The document will be subject to a final design and layout modification once it has been adopted by the Council. Just like the joint SPG 'Pontcysyllte Aqueduct and Canal World Heritage Site' the intention is to have in place a SPG whose content and design is alike in all three local planning authorities.

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Paragraph	Proposed change	Link to received presentation
document front page	Consultation Draft – October 2017 April 2018	n/a, editorial
Contents	Contents page to be amended to show correct title of Appendix 1 Map of the AONB showing Local Authority Areas and contact information Map showing extent of local authority areas within the AONB and contact information	n/a, editorial
Introduction on page 2	Delete paragraphs under the heading ‘Document status and stages in preparation (for Denbighshire County Council)’, and insert new paragraph: This SPG was adopted by Denbighshire County Council on XXXX, Flintshire County Council on XXXX and adopted as interim guidance by Wrexham County Borough Council on XXXX. The AONB Joint Committee and Partnership approved the content of the document on XXXX. The draft SPG was the subject of public consultation between November 2017 and January 2018. A report of the comments made during the consultation and the changes made as a result is available on request.	n/a, editorial
Paragraph 1	Paragraph 1, first sentence to read: AONB’s AONBs are designated for their outstanding landscape and the need to conserve and enhance their natural beauty for the enjoyment of existing and future generations.	Representation made by Michael Skuse
Paragraph 5	Paragraph 5, last sentence to read: The AONB Joint Committee and Partnership will also adopt approved this planning guidance.	n/a, editorial
Paragraph 9	Paragraph 9, fourth sentence to read: Consideration should be given to how new development proposals impact on these special qualities and whether they are conserved and enhanced during the process .	Representation made by the AONB Partnership
Paragraph 13	The AONB Landscape Types – Built environment, p. 10; amend first sentence under the heading ‘Key characteristics’ to read: The built environment has varying influences on the character of the AONB and its setting, and includes towns, villages, rural farming and rural enterprise development, residential settlement and transport, energy and communications infrastructure.	Representation made by Bourne Leisure (c/o Lichfields)
Paragraph 13	The AONB Landscape Types – Quarries, first bullet point on page 11 under the heading ‘Specific development management considerations’ to read:	Change proposed by Officers but linked to representation made by P. Gill

Table 1 - Summary of proposed changes to the draft Supplementary Planning Guidance (SPG) note: Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)

Paragraph	Proposed change	Link to received presentation
	There are a number of active quarries within and adjacent to the area. Long term planning for landscape integration along the boundaries of such developments is necessary, with landscape schemes implemented as part of advance works with ongoing management.	
Paragraph 14, page 17	Paragraph 14, Agriculture and Forestry section, insert new third sentence to read: The future care and management of the landscape is heavily dependent on agricultural and forestry activity. Around 20% of AONB land is covered by agricultural conservation initiatives and these have had a positive impact on habitat and land-scape conservation, particularly the management of common land. Future changes to agri-environmental support schemes may also impact on the landscape. The challenge will be to ensure that the farming community sustains a living whilst ensuring the landscape and habitats benefit.	Representation made by the AONB Partnership
Paragraph 14, page 18	Paragraph 14, p.18, last sentence to read: There are similar smaller scale examples elsewhere, where villages follow the line of the line of the lower hillslopes - for example the villages to the west of the Clwydian Ridge.	Representation made by Michael Skuse
Paragraph 14, page 18	Paragraph 14, page 18 Development section, add an additional bullet point at the end to read: <ul style="list-style-type: none"> ○ The built environment of the AONB, notably the World Heritage Site, Listed Buildings, Conservation Areas and Historic Parks and Gardens all contribute to the special character of the area, and insensitive development and change can impact on the quality of these heritage assets. 	Representation made by Tony King
Paragraph 14, page 18	Paragraph 14, page 18 Development section, add an additional bullet point at the end to read: <ul style="list-style-type: none"> ○ Excessive lighting of development impacts on the sense of tranquillity, wildlife and quality of life. 	Representation made by BRO Partnership
Paragraph 14, page 19	Paragraph 14, p.19, second sentence under the heading 'Renewable energy and climate change to read: However, larger renewable energy proposals outside the AONB can be highly visible and impact on its setting.	Representation made by Michael Skuse
Paragraph 15	Paragraph 15, add the following sentence at the end of it to read: It is crucial that new development proposals are informed by a thorough assessment of the site surroundings and its setting.	Representation made by Design Commission for Wales

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Paragraph	Proposed change	Link to received presentation
Paragraph 15	Paragraph 15, add the following sentence at the end of it to read: Making use of photomontages can be helpful in demonstrating how a development proposal sits within the landscape.	Representation made by Design Commission for Wales
Paragraph 26	Paragraph 26, update internet link to 'Malvern Hills AONB' document	Representation made by Design Commission for Wales
Paragraph 37	Paragraph 37, amend paragraph from the sixth sentence onwards to read: Excessive lighting will produce glare and light trespass outside the site which can impact on tranquillity, wildlife and local quality of life. It is possible to provide shields and baffles and angle lighting downwards to prevent the upward spillage of light, minimise lighting output (maximum 3500 lumens), introduce timers and specify colour temperature (less than 3000 kelvin) to moderate the impact of lighting over a wider area. Development proposals should be accompanied by sufficient technical details of any lighting to enable an assessment to be undertaken.	Representation made by Roger Pawling
Photos	Replace photo in the top right hand on page 10	Representation made by Michael Skuse
In general	Changes to legibility and format will be undertaken at document design stage.	n/a
In general	Correction of errors relating to spelling and/ or grammar.	n/a

Table 1 - Summary of proposed changes to the draft Supplementary Planning Guidance (SPG) note: Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)

Name, Organisation	Paragraph, Section	Summary of representation	Council's response	Changes proposed to the draft document
Roger Pawling	In general	<p>Concerned about apparent lack of mention of light pollution despite the current Dark Sky Wales to assess the feasibility of gaining Dark Sky status. Concerned about floodlighting of buildings and their surroundings, whether residential or commercial. The A55 Caerwys roundabout has become an area of light pollution, with petrol station, cafe and the nearby plant hire business all brightly lit at night. The level of lighting is typical of an urban area, but is in the AONB. Should be both restrictions on the brightness and quantity of light fittings, and on the percentage of light that escapes upward from them?</p>	<p>The A55 junction 31, Caerwys, is not in the AONB but it is accepted that the light in this area is visible from the higher ground of the AONB. The issue of light pollution in and around the AONB is important, particularly in the context of the Dark Skies initiative. Development proposals that are likely to affect the amenity of local residents or the characteristics of the locality by virtue of light pollution are specifically assessed in line with Denbighshire Local Development Plan 2006 – 2021 (LDP) , Policy RD 1 criteria vi). Flintshire C and Wrexham CBC address light pollution in line with their respective development plan policies and guidance documents. Draft AONB SPG, paragraph 37, provides further design considerations for the installation of lighting facilities – either within or in the vicinity of the AONB. However, it is agreed that para 37 could be strengthened. In addition, a Design Note may be prepared on this topic (see paragraph 17). (See also response to</p>	<p>Paragraph 37, amend paragraph from the sixth sentence onwards to read: 'Excessive lighting will produce glare and light trespass outside the site which can impact on tranquillity, wildlife and local quality of life. It is possible to provide shields and baffles and angle lighting downwards to prevent the upward spillage of light, minimise lighting output (maximum 3500 lumens), introduce timers and specify colour temperature (less than 3000 kelvin) to moderate the impact of lighting over a wider area. Development proposals should be accompanied by sufficient technical details of any lighting to enable an assessment to be undertaken.'</p>

Table 2 - Summary of representations received on the draft Supplementary Planning Guidance (SPG) note: Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)

Name, Organisation	Paragraph, Section	Summary of representation	Council's response	Changes proposed to the draft document
Roger Pawling			representations from Bro Partnership)	
Michael Skuse	In general	Overall I think it is a splendid document and will give balanced and thorough guidance to developers within the AONB.	Support welcomed.	No change proposed.
	Paragraph 1, first word	Grammatical error; use of Plural form, not possessive noun	Grammatical error to be rectified.	Paragraph 1, first sentence to read: 'AONBs are designated for their outstanding landscape and the need to conserve and enhance their natural beauty for the enjoyment of existing and future generations.'
	The AONB Landscape Types – Built environment, p. 10	In my view the house on the right is poorly designed and not suitable as an example of good design. It appears to be a cottage and a barn, joined together to make one big house. The white finish is incompatible with the stone finish, the blue colour is inappropriate, and the long strip window in the 'joining' section is out of keeping with the other windows.	Subjective view of representor is acknowledged; Consideration will be given to an alternative photo which better illustrates the key 'built environment' characteristics in this section.	Replace photo in the top right hand on page 10 at document design stage.
	The AONB Landscape Types – Quarries,	I think the picture of the quarry is outside the AONB?	The picture on the left is a former sand pit which lies on the north side of the A541; adjacent to the boundary of the AONB.	No change proposed.

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Name, Organisation	Paragraph, Section	Summary of representation	Council's response	Changes proposed to the draft document
Michael Skuse	p. 11		Nevertheless, the draft SPG is not only pertinent to development proposals within the AONB boundary but applies to development outside the AONB that could have an impact on its setting or characteristics.	
	Paragraph 14, p.18, last sentence	Grammatical/ typo error; duplication of words	Typo error to be rectified. 'There are similar smaller scale examples elsewhere, where villages follow the line of the line of the lower hillslopes - for example the villages to the west of the Clwydian Ridge.'	Paragraph 14, p.18, last sentence to read: 'There are similar smaller scale examples elsewhere, where villages follow the line of the lower hillslopes - for example the villages to the west of the Clwydian Ridge.'; Re-paragraphing the document for ease of reference
	Paragraph 14, p.19, Renewable energy and climate change section	Line 3: the use of the word 'However' is inappropriate. It should be 'Moreover' because it adds another similar sentiment to what has gone before. (The word 'however' introduces a conflicting idea, e.g. 2 and 2 are 4; however 2 and 3 are not. The word 'moreover' reinforces what has gone before, e.g. 2 and 2 are 4; moreover 1 and 3 are 4 as well.)	Avoiding conflicting sentiments in interpretation of sentence, delete the word 'however' i.e. 'However, Larger renewable energy proposals outside the AONB can be highly visible and impact on its setting.'	Paragraph 14, p.19, second sentence to read: 'Larger renewable energy proposals outside the AONB can be highly visible and impact on its setting.'; Re-paragraphing the document for ease of reference

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Name, Organisation	Paragraph, Section	Summary of representation	Council's response	Changes proposed to the draft document
Michael Skuse	Paragraph 14, p.19, Renewable energy and climate change section, sixth sentence	“The influence of climate change will not be immediately obvious, but increases in temperature will lead to habitat loss and change.” Perhaps you should not be so dogmatic here.....it might be wiser to hedge your bets! You do not absolutely know without any doubts whatsoever that climate change will lead to increases in temperature, nor that habitat loss will result. The use of the word ‘may’ rather than ‘will’ would be more appropriate.	A fundamental principle embodied in Planning Policy Wales is ‘Planning for Climate Change’. Para 4.4.4 of PPW states ‘Climate change will have potentially profound environmental, economic and social justice implications...’ and goes on to list some of the ‘events’ that Wales ‘can expect’. In this context the wording of this section of the guidance note, and the examples of climate change given, are considered to be reasonable.	No change proposed to text but re-paragraphing the document for ease of reference
Tony King	Paragraph 3	The consultation document is primarily targeted at individuals proposing new development. However I am concerned that nowhere in the document is there a reference to developments affecting Listed Buildings. Some years ago Llanferres Mill was de-Listed because planning consent had been given for a development that detracted from its original appearance. Currently a planning application is under consideration at the Nant Engine House, Llanarmon yn Ial, which is also a Listed Building. If consent is given in this case some characteristic features	There are specific Supplementary Planning Guidance notes for ‘Listed Buildings’ and ‘Conservation Areas’ which complement local development plan policies such as, Denbighshire LDP Policy VOE 1 – Key Areas of Importance. The AONB SPG must be read in conjunction with them. Paragraphs 14 and 21 refer to Listed Buildings and conservation areas but it is agreed that further reference could be made in paragraph 14 relating to ‘Factors for Landscape Change’.	Paragraph 14, page 18 Development section, add an additional bullet point at the end to read: ‘The built environment of the AONB, notably the World Heritage Site, Listed Buildings, Conservation Areas and Historic Parks and Gardens all contribute to the special character of the area, and insensitive development and change can impact on the quality of these heritage assets.’

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Tony King		of this building will be lost and therefore may lead to de-Listing.		
	Paragraph 9, table 6	In para 9, table 6, AONB Special Qualities: the relevant AONB policy is to conserve and enhance features and sites of archaeological, cultural or historic importance. It is perfectly possible to carry out sympathetic development of most Listed Buildings. I would argue that the development of a Listed Building within the AONB should not result in de-Listing except in exceptional circumstances. Some guidance on this issue should be given in the Guidance note.	There is a distinction between an AONB Management Plan, which focus on the special characteristics, and a Supplementary Planning Guidance note, which can be material in determining planning applications by a local planning authority. The draft AONB SPG will apply in conjunction with the procedures for securing listed building consent, and, therefore, should ensure that the qualifying features of the building are preserved. De-listing is not within the remit of this SPG.	No change proposed.
The AONB Partnership	Paragraph 9	The bold type sentence starting 'Consideration' should be amended by deleting 'during the process' at the end. The rationale behind the comment was to give it added strength in, for example, an appeal where an applicant might argue that they did consider such matters 'during the process' of developing their scheme but dismissed them!	Change agreed. Delete '...during the process' as the AONB Special Qualities should not only be considered in the planning process.	Paragraph 9, fourth sentence to read: 'Consideration should be given to how new development proposals impact on these special qualities and whether they are conserved and enhanced.'
	Paragraph 14, Agriculture	Factors for Landscape Change - Agriculture and Forestry section. The	There is no reference in the document to the United Kingdom of	Paragraph 14, Agriculture and Forestry section, insert

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The AONB Partnership	and Forestry section, second sentence	Brexit word came up in relation to the sentences about agri-conservation schemes and the potential impact this could have. I don't think it would be appropriate to specifically mention Brexit, but would have no problem with adding a more general sentence after '... the management of common land.' along the lines of 'Possible future changes to agri-environment support schemes may also impact on the landscape.'	Great Britain and Northern Ireland's decision to leave the European Union. It is acknowledged that changes in land management may have an impact on the landscape. That will be reflected in the document by inserting the following sentence: 'Future changes to agri-environmental support schemes may also impact on the landscape.'	new third sentence to read: 'Future changes to agri-environmental support schemes may also impact on the landscape.'
BRO Partnership (Dark Skies project)	Paragraph 37	My initial thoughts are that the reference to lighting in para 37 is fine, though of course if Dark Skies Community status is secured at a later point this could be strengthened. Also, it might be useful to include some references earlier in the document to set out the added value of dark skies to the special qualities of a landscape, especially in terms of a sense of place and protecting wildlife.	See also response and proposed changes to the document addressing representation made by Roger Pawling. In addition, paragraph 14 (Development section) - makes additional reference to the benefits of dark skies.	Paragraph 14, page 18 Development section, add an additional bullet point at the end to read: 'Excessive lighting of development impacts on the sense of tranquillity, wildlife and quality of life.'
Friends of the Clwydian Range and Dee Valley AONB	In general	On behalf of the "Friends of the Clwydian Range and Dee Valley AONB" I write to express the Charity's support for the draft Supplementary Planning Guidance Note which has been the subject of the recent	Support welcomed.	No change proposed.

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Friends of the Clwydian Range and Dee Valley AONB		consultation exercise. The draft document made available as part of the consultation process is both comprehensive and properly understanding of the sensitivities needed to protect and enhance this most important landscape. The document has the "Friends" full and unequivocal support.		
Ramblers Association Flintshire Ramblers Association Flintshire	In general	On behalf of the Ramblers' Association's Flintshire Footpaths Committee I write to express full support for the draft SPG.	Support welcomed.	No change proposed.
	In general	The draft document is both comprehensive and properly understanding of the sensitivities needed to protect and enhance this most important landscape. Our only additional comment concerns cases where sensitive development is permitted, and that development affects or possibly incorporates a public right of way. In these circumstances, developers should be encouraged to make use of the footpath or bridleway in a way which supports active travel and stimulates residents to access adjacent countryside and, where available,	It is agreed that new development should sensitively incorporate and wherever possible enhance opportunities for active travel and recreation. Welsh Government published guidance on rights of way for local authorities and individuals on their website. Obstructions to rights of way are the responsibility of the Highways authority, not the local planning authority. Concerned ramblers should report any obstructions to them. Nevertheless, development proposals likely to affect a right of way will be consulted on with Highways. To that	No change proposed.

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Ramblers Association Flintshire Ramblers Association Flintshire		local shopping and recreational facilities. This should mean sensitively retaining and, where necessary, improving the existing path and not merely making it part of the development's adopted highway.	extent, it is expected that they also comply with the provisions of the Active Travel (Wales) Act.	
The Coal Authority	In general	The Coal Authority has no specific comments to make.	Comment noted.	No change proposed.
The Campaign for the Protection of Rural Wales (CPRW), Clwyd Branch The Campaign for the Protection of Rural Wales (CPRW), Clwyd Branch	In general	Although generally supportive of the contents of the SPG, it is felt that AONBs are likely to become hubs for the development of intensive tourism (chalet / lodge / static caravan park / touring caravan park), leisure activities, renewable energy with associate infrastructure and economic development at the expense of landscapes. SPG is not in itself policy and therefore fails to carry the same weight, although it is a material planning consideration when making development management decisions.	Supplementary Planning Guidance notes are neither national nor local policy. Planning policies are laid out in Planning Policy Wales (PPW) and the adopted Local Development Plans. PPW Edition 9, paragraph 2.3.1, 'Selective use of supplementary planning guidance (SPG) is a means of setting out more detailed thematic or site specific guidance on the way in which the policies of an LDP are to be interpreted and applied in particular circumstances or areas.'	No change proposed.
	In general	It is recommended that there is a stated commitment within the document that the Sandford Principle will be applied as and when necessary. This is a long standing mechanism for ensuring that priority is given to conservation where there	The Sandford Principle was introduced as a means of reconciling conflicts in National Parks between conservation and recreation. In effect it advises that conservation interest should take priority. However, the SPG is not in itself the	No change proposed.

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<p>The Campaign for the Protection of Rural Wales (CPRW), Clwyd Branch</p> <p>The Campaign for the Protection of Rural Wales (CPRW), Clwyd Branch</p>		<p>are irreconcilable conflicts with other purposes and duties.</p>	<p>means for decision making on development proposals as this rests on conformity with policies in the development plan, national policy and other material planning considerations. In many instances it is necessary to balance competing policy objectives or effects and benefits of developments, and this is a matter of planning judgement in each case. PPW Edition 9 advises in in 5.3.5 'The primary objective for designating AONBs is the conservation and enhancement of their natural beauty. Development plan policies and development management decisions affecting AONBs should favour conservation of natural beauty, although it will also be appropriate to have regard to the economic and social well-being of the areas. Local authorities, other public bodies and other relevant authorities have a statutory duty to have regard to AONB purposes.' Hence it is not considered necessary or appropriate for the Sandford Principle to be embodied within this SPG.</p>	

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The Campaign for the Protection of Rural Wales (CPRW), Clwyd Branch The Campaign for the Protection of Rural Wales (CPRW), Clwyd Branch	In general	Uniformity of the three local authority planning policies and SPG Notes require to be taken into account with regard to development management decisions for the AONB. Failure to address omitted or conflicting planning policy or guidance occurring will result in difficulties when defending planning appeals.	All three local planning authorities, i.e. Denbighshire, Flintshire, Wrexham, are aiming to adopt the SPG subject to any approved changes following public consultation. National planning policy for AONB's applies across all the planning authorities. Local development plans are at different stages of preparation and it is acknowledged that there is a need for consistency across the AONB.	No change proposed.
	In general	It is advised that prior to formal adoption, proofreading is undertaken to eliminate errors.	Comment noted.	Correction of errors relating to spelling and/ or grammar.
P. Gill	In general	There is one particular aspect of the SPG which relates to the approach to be adopted in relation to disused quarries within the AONB of which there are number, mainly limestone quarries. By its very nature, a disused quarry leaves a substantial scar on the countryside in the form of a large void which is not easy to ameliorate due to its size. Planning policies in the past have attempted to address this problem by insisting, rightly, that restoration and aftercare measures are taken on the cessation of	The comments raise policy issues which are outside the remit of supplementary guidance. The role of the SPG is not to set out a strategy for the restoration of quarries (active or disused) within the area but to identify the matters which should be taken into account when considering planning applications for development within the AONB and its setting. Quarries are identified as an important feature of the AONB as they reflect its industrial heritage. Many of the disused quarries within	The AONB Landscape Types – Quarries, first bullet point on page 11 under the heading 'Specific development management considerations' to read: 'There are a number of active quarries within and adjacent to the area. Long term planning for landscape integration along the boundaries of such developments is necessary, with landscape

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P. Gill		<p>quarrying activities. However, even the most careful scheme of restoration usually still leaves a substantial hole in the ground which is a blot on the AONB and as a disused quarry is a dangerous place, it becomes an area of the AONB to which access generally is prohibited and which cannot be enjoyed by others. Whilst restoration and aftercare provide a short to medium term (i.e. a 5 to 25 year) solution to the visual impact of a disused quarry, the long term outcome is a problem which neither the Consultation Draft nor the SPG address directly. A disused quarry void will, to all intents and purposes, be there forever and whilst the surface itself may well become overgrown in time, the void containing it will remain out of bounds for pretty well forever because of the inherent dangers in it. I submit, therefore, that the SPGN needs to address this problem in a manner which takes a long term view of the disused quarries and allows for sensible and sensitive development of them which has the objective of</p>	<p>the AONB have been assimilated into the landscape, offering valuable habitat for protected and important species and some also offer significant opportunity for tourism. (National policy seeks to move mineral extraction away from the AONB, however, there are existing quarries which are yet to be fully restored within the AONB and quarries within the setting of the AONB which could have an adverse impact on the AONB if not given adequate consideration at the planning application stage.) The draft SPG sets out the importance of quarrying and its history as a key characteristic of the AONB and advises that any after uses should not have an adverse impact on the tranquillity of the AONB. The SPG therefore doesn't preclude any specific after uses within disused quarries but does highlight the fact that reuse for waste management and industrial uses can reintroduce disturbance to what are now tranquil places. The infill of voids within hard rock quarries created by</p>	<p>schemes implemented as part of advance works with ongoing management.'</p>

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P. Gill		<p>returning them in some way to a more positive presence within and in the context of the AONB. For example, sensitively carried out development which would reduce the extent of the void and return it to a contour more in keeping with the surrounding countryside should be encouraged not least from the point of view of improving the long-term visual impact of the quarry on the AONB. Quarry faces which are interesting from a geological or other point of view could be easily preserved within development of this kind for future generations. In addition, properly managed development of this kind could and would be very likely to improve the natural habitat of local flora and fauna and the general biodiversity of the disused quarry site and its environs. The restrictive nature of the SPGN when applied to disused quarries, which should be considered differently from working quarries, positively discourages attempts to ameliorate and improve their impact on the AONB and return the</p>	<p>quarrying brings with it potentially significant impacts (noise, dust, disturbance and so on) which could be contrary to the special qualities of the AONB. The policies of the Denbighshire LDP seek to direct waste management activities away from the AONB and significantly, Policy VOE 8 directs disposal of waste away from the AONB so any re-contouring of quarries would need to be carried out without reliance on waste material. Any benefits of in filling a void would therefore need to be carefully balanced with any disbenefits, with significant weight to be given to the need to protect the special characteristics and qualities of the AONB.</p> <p>Officers propose an amendment to the first bullet point on page 11 under the heading 'Specific development management considerations' to reflect the presence of active quarries within and adjacent to the AONB.</p>	

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P. Gill		<p>countryside of which they form part to “natural beauty” as defined by the Countryside Council for Wales as follows:- “Natural Beauty applies to unspoiled, rural landscapes that are largely free from the effects of disfiguring development or urbanisation...” Whilst quarrying activities, by their very nature, undoubtedly disfigure the countryside, existing planning policies need to take a far longer term view than at present regarding the means to enable and encourage these sites to be improved and returned where possible to a state of natural beauty within the AONB for the enjoyment and benefit of future generations not only for the next 25 years or so but also for those in the remainder of this century and the next. If this is not done, disused quarry sites will become largely inaccessible to visitors to the AONB and sterilised for future enjoyment by future generations. That does seem to defeat an essential purpose of the AONB.</p>		

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Bourne Leisure (c/o Lichfields)	In general	<p>Of relevance to this consultation, Bourne Leisure operates Presthaven Sands Holiday Park, which is located almost immediately to the north of the Clwydian Range and Dee Valley Area AONB. The Park straddles the boundary of Flintshire and Denbighshire Councils' administrative areas. Bourne Leisure also operates Bodelwyddan Castle Hotel which is located approximately 5 miles away from the AONB. As a matter of principle, Bourne Leisure supports the recognition of the value of the AONB and the tourism sector. Importantly, it is noted that the draft SPG does not seek to preclude new development, but rather ensures that new development conserves and enhances the special qualities of the AONB. This approach accords with the primary objective for designating AONBs that is set out within Planning Policy Wales (PPW) (edition 9, November 2016), at paragraph 5.3.5. It also aligns with paragraph 5.5.5 of PPW which states that "statutory designation does not necessarily prohibit development..."</p>	Support welcomed.	No change proposed.

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Bourne Leisure (c/o Lichfields)	Paragraph 14, tourism section	From reading Para 14 of the draft SPG it is clear that tourism is a significant contributor to the AONB, and the Company considers that it is vitally important that local planning authorities support the future growth of tourism-related development. This accords with national planning policy, which states that development plan policies and development management decisions affecting AONBs should 'favour conservation of natural beauty', although also 'have regard to the economic and social well-being of the areas' (PPW, (edition 9, November 2016), paragraph 5.3.5). Paragraph 14 will also contribute positively towards meeting the Welsh Government's aim which is for "tourism to grow in a sustainable way and to make an increasing contribution to the economic, social and environmental well-being of Wales" (PPW, paragraph 11.1.2).	Comment noted.	No change proposed to text but re-paragraphing the document for ease of reference
	The AONB Landscape Types – Built	Page 10 of the draft SPG sets out the special qualities and key characteristics of the built environment of the AONB. It states	The list is not all embracing as it is pre-fixed by 'and includes...'. It would not be helpful to list all forms or types of development and if	The AONB Landscape Types – Built environment, p. 10; amend first sentence under the heading 'Key

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Bourne Leisure (c/o Lichfields)	environment, p. 10	<p>“The built environment has varying influences on the character of the AONB and its setting, and includes towns, villages, rural farming and residential settlement and transport, energy and communications infrastructure” (page 10). Bourne Leisure raises no objection in principle to the key characteristics listed within the draft SPG but considers that tourism-related development, such as holiday parks and hotels, should also be specifically identified as a key characteristic of the built environment. This will align with paragraph 14 of the draft SPG, which recognises tourism as being a factor that influences landscape change of the AONB and its setting. It also recognises the value of tourism to the local economy. Bourne Leisure therefore requests that the sentence is reworded “The built environment has varying influences on the character of the AONB and its setting, and includes towns, villages, rural farming and residential settlement and transport, energy and</p>	<p>‘tourism’ were added then other individual types of development could also make a case for inclusion. Nevertheless, it would be reasonable to add a catch all category of ‘rural enterprise development’ which could include a wide variety of rural employment generating activities, which includes tourism.</p>	<p>characteristics’ to read: ‘The built environment has varying influences on the character of the AONB and its setting, and includes towns, villages, farming and rural enterprise development, residential settlement and transport, energy and communications infrastructure.’; Re-paragraphing the document for ease of reference</p>

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Bourne Leisure (c/o Lichfields)	Paragraph 31	<p>communications infrastructure, and tourism-related development".</p> <p>Paragraph 31 of the draft SPG relates to new development that impacts on the setting of the AONB and Bourne Leisure supports this approach; the recognition that the visual impact of new development on the setting of the AONB can be minimised is important. The Company recognises that this can be achieved through sensitive design, such as for example the use of natural vegetation for screening, and by siting development with the contours / flow of the landform and the prevailing patterns of the land. The Company also supports the recognition that elements of the landscape may be locally changed to accommodate development, provided that the prevailing character of the landscape remains intact. Bourne Leisure understands the importance of conserving and enhancing the special qualities of the AONB. As many of Bourne Leisure's sites are located in rural and/or coastal areas, incorporating or adjacent to</p>	Support welcomed.	No change proposed.

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Bourne Leisure (c/o Lichfields)		<p>conservation sites and protected areas, the Company has significant experience of operating within and adjacent to such locations and takes the need for conservation and enhancement fully into account – both in day to day operations and when preparing development proposals for sites. This approach is considered to be consistent with national planning policy which recognises the importance of balancing conservation objectives with the wider economic needs of local businesses and communities (PPW, paragraph 5.5.1). National planning policy also encourages local planning authorities to consider whether environmental issues can be adequately addressed by modifying the development proposal, where possible (PPW, paragraph 5.5.3), and recognises that unavoidable harm to nature conservation can be minimised by mitigation measures (Technical Advice Note 5, paragraph 2.4). This proposed approach in the draft SPG will ensure that suitable and sustainable development proposals</p>		

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Bourne Leisure (c/o Lichfields)		that would bring positive benefits to the local area would not be prevented from coming forward. It will also contribute positively towards meeting the Welsh Government's aim which is for "tourism to grow in a sustainable way and to make an increasing contribution to the economic, social and environmental wellbeing of Wales" (PPW, paragraph 11.1.2).		
	Paragraphs 35 to 39	Paragraphs 35 - 39 of the draft SPG refer to landscaping and Bourne Leisure supports the recognition that buildings can be screened by good planting schemes, earth mounding and other forms of boundary treatment, and that this can result in new development assimilating into the countryside. The Company has significant experience of preparing and implementing high quality landscaping schemes as part of recent development proposals. These successfully assimilate new development into the countryside, while also providing environmental benefits and biodiversity enhancement.	Support welcomed.	No change proposed.

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Bourne Leisure (c/o Lichfields)		The draft SPG's approach to landscaping is considered to be consistent with national planning policy, which recognises the importance of balancing conservation objectives with the wider economic needs of local businesses and communities (PPW, paragraph 5.5.1), and which recognises that unavoidable harm to nature conservation can be minimised through mitigation (Technical Advice Note 5, paragraph 2.4) as referred to above. This will ensure that development proposals that contribute positively towards meeting the Welsh Government's aim for tourism are not prevented from coming forward, where any unavoidable harm to the AONB is suitably mitigated through a landscaping scheme.		
Natural Resources Wales (c/o North Planning)	In general	It is noted that the document once adopted will be treated as material consideration during the application determination process. NRW welcome the Supplementary Planning Guidance (SPG) for the Clwydian Range and Dee Valley AONB. The SPG	Support welcomed.	No change proposed.

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Natural Resources Wales (c/o North Planning)		marks an important collaboration between the three local planning authorities (Denbighshire, Flintshire and Wrexham) in developing a common approach to managing development change within and adjacent to the AONB. The SPG helpfully describes the characteristic landscape attributes of the area that contribute to local and regional distinctiveness and experience of the area's natural beauty. It then provides an analytical process and uses a series of questions to help structure planning and design thinking. This should lead to developing appropriate forms of development that are responsive to their local context and avoiding forms and locations resulting in landscape impact.		
	In general	We consider that additional photographs / illustrations would be helpful within the final documents in order to help explain some of the points made.	More representative photos will be included in the final document.	Include additional photos at document design stage.
Canal & River Trust	In general	The Trust supports the thrust of the SPG, but has no specific comments to make on the document as currently drafted.	Support welcomed.	No change proposed.

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Welsh Government (Cadw)	Section 3	Our only comment is that would wish to see a specific mention of the Welsh Government History Environment Service (Cadw) guidance "Managing Change to World Heritage Sites in Wales" in section 3: http://cadw.gov.wales/historicenvironment/publications/worldheritagesites/?lang=en	Denbighshire CC and Wrexham CBC have a local policy on the Pontcysyllte Aqueduct and Canal World Heritage Site in their local plans, which is supplemented by a joint topic-specific SPG. Draft AONB SPG, paragraph 4, highlights that the AONB guidance note should be read in conjunction with other SPG's. There are numerous guidance documents that could be cross referenced within the document, but given the objective and content of the guidance note in seeking to improve the quality of development generally, it is not considered that this is necessary or appropriate.	No change proposed.
Design Commission for Wales	In general	General formatting and legibility of the document could be improved to be more user-friendly, though we understand that this may come at a desktop publishing stage of the final document.	Improving legibility and formatting of document will take place once the text has been approved by the local planning authorities.	Changes to legibility and format will be undertaken at document design stage.
	In general	The document would benefit from more analysis and presentation of existing local conditions to helpfully inform proposals. There is reference to various aspects throughout the text in the design section but it may be	Detailed analyses of local conditions within and in the vicinity of the AONB is provided in the AONB Management Plan, Natural Resources of Wales' Landmap system, and design guidance for	No change proposed.

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Design Commission for Wales		more useful to consolidate this into one place.	selective towns such as, Llangollen. The draft AONB SPG draws information from these Plans, and summarises the essential design information in paragraphs 11, 13. Paragraphs 15 to 39 provide guidance for prospective applicants by posing questions under the heading 'It's a question of...'	
	Paragraph 15	New development should be encouraged to firstly seek to contribute positively to the AONB, rather than simply avoiding adverse impacts. This approach to design would avoid the need for any mitigation of detrimental impacts. Reference should be made to sustainable building practice in relation to orientation, mass, materials and glazing. See Welsh Government guide: http://gov.wales/docs/desh/publications/150311practice-guidance-planning-for-sustainable-buildings-en.pdf	Thrust of comment agreed – paragraph 15 explicitly makes this point. In addition, Planning Policy Wales (PPW) Edition 9, paragraph 5.3.5., and draft AONB SPG, paragraph 2, 'Development Plan policies and development management decisions should favour the conservation of natural beauty and have regard to economic issues and social well-being.'	No change proposed.
	Paragraph 18	The introduction to Key Design Considerations should stress that thorough site and context analysis be undertaken with demonstration of	Paragraph 15, second sentence, highlights the importance of having regard to the setting and site surroundings for good quality design	Paragraph 15, add the following sentence at the end of it to read: 'It is crucial that new

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Design Commission for Wales		how this has informed the proposal, with specific attention to the sensitive landscape context. See Welsh Government guide http://gov.wales/docs/desh/publications/160513-site-and-context-analysis-guide-en.pdf	in new developments. However, this can further be strengthened by adding another sentence at the end of paragraph 15.	development proposals are informed by a thorough assessment of the site surroundings and its setting.'
	Paragraph 23	Contemporary designs should be encouraged where proper site analysis is demonstrated and a contextual design response has been developed.	Regardless of modern, traditional, or experimental design, all new development should be informed by a thorough assessment of the site surroundings and its setting. This is reflected in paragraph 15, as amended (see previous comment).	No change proposed.
	Paragraph 26	Broken internet link	Internet links are easily out-of-date, i.e. broken. Consideration is given to include a more generic link to the document.	Paragraph 26, update internet link to 'Malvern Hills AONB' document.
	Paragraph 31	Thorough site analysis with distance views and photomontages can be used to demonstrate how the proposal has been sensitively integrated into the environment.	Photomontages are a useful tool for assessing the impact of a development proposal on the wider landscape. Reference to the tool to be included in Paragraph 31.	Paragraph 15, add the following sentence at the end of it to read: 'Making use of photomontages can be helpful in demonstrating how a development proposal sits within the landscape.'
	Paragraph 35	Sensitively designing for the landscape context of the development should be considered	This point is considered to be made within the last sentence 'However,	No change proposed.

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Design Commission for Wales		from the outset so as to avoid the need for landscape screening as mitigation for bad design.	landscaping will not by itself, make a poor development acceptable'.	
	In general	Use of the term 'contemporary' rather than 'modern', is more appropriate language to use in this context and will give the reader more clarity on the aspiration of the Local Authorities. Additionally, when schemes are described as 'innovative', this innovation should be detailed and evidenced to set a high precedent for innovative design in the AONB.	This point is a matter of semantics. There could be a lengthy discussion about the difference between 'contemporary' and 'modern'. However, the language of the document should be kept plain and easily accessible for all readers.	No change proposed.

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