

APPENDIX 1

World Heritage Site SPG Consultation Summary

Representor	Summary of comments	Council comments
<p>1. Shelagh Roberts, Cefn-y-Fedw, Penycae, Wrexham, LL14 1UA,</p>	<p>Would like a copy of the letters sent to interested parties during the WHS designation consultation.</p> <p>Page 11 of the document does not state that landowners have been consulted.</p> <p>Page 11 of the document does not state that the local access forums of Denbighshire or Wrexham have not been consulted.</p> <p>Considers the words ‘sense of arrival’ are misleading’ and should refer to planning policy and not access.</p> <p>Unclear why the sense of arrival and history of the WHS are important to the integrity of the designation.</p>	<p>This is outside the scope of the document. We will forward this request to the relevant colleague.</p> <p>Extensive consultation took place including press notices, 3 drop-in sessions, letters to agents and developers and a specially convened meeting with local farmers.</p> <p>It was concluded that a full equality impact assessment on the guidance note is not required because it is based on advice from National Policy Wales which has been the subject of impact assessments carried out by the Welsh Government. In addition it amplifies policies contained in the Unitary Development Plan (UDP) which was subject to a full equality impact assessment and extensive public consultation.</p> <p>Sense of Arrival is fully defined in Appendix 2 of the document.</p> <p>The sense of arrival and history of the site are fundamental elements of the appreciation of the site as a place of outstanding</p>

	<p>Unclear on what types of development do not require the submission of a Design & Access Statement and what analysis is required therein.</p>	<p>importance.</p> <p>This document does not specify when document does and does not need a DAS, this is covered in national legislation. Therefore, duplicating national regulation would be necessary. However, a pointer to the relevant part of the planning regulations that specify this requirement could be helpful. Table 1 explains what level of detail is required in a DAS.</p>
<p>2. Phillip Jones, (via email),</p>	<p>Considers that the buffer zone should be extended to include the Pengwern Vale and land further to the west known as 'Gwernant' as this area contributes and has views to and from the WHS.</p> <p>Considers that there should be stated presumption against development within the WHS BZ and on proposals that harm views in and out of the WHS.</p>	<p>Comments noted. However, this document/process does not have the ability to alter the extent of the WHS buffer zone.</p> <p>The WHS and buffer zone area is wide and diverse. As the document notes, sometimes a householder application can have a larger impact on the WHS than a larger development. It is considered a broad brush presumption against development would be unreasonable, and that a case by case approach to assessing impact on the WHS & BZ would be more appropriate. The Council is confident that this approach, the guidance and policies it endorses will provide sufficient and proportionate protection to the designation.</p>

<p>3. Deborah Hemsworth, Environment Agency Wales,</p>	<p>'We note the contents of the document but, as it deals with matters outside our remit, have no comment to make'.</p>	<p>Comments noted.</p>
<p>4. Paul Mitchell, Countryside Council for Wales,</p>	<p>Welcomes the document and co-operative working of the three local authorities.</p> <p>Unclear about table 1 in the SPG; concerned it indicates that any development within the WHS, or immediately adjacent to it, does not require a DAS. Consider that scenario 1 does not require the appropriate level of assessment.</p> <p>Believe that WHS is classed as Article 1 (5) land in the Town and Country Planning (General Permitted Development) Order 1995 (GPDO).</p> <p>Table 1, scenario 1, 'siting' should be added to 'design and materials important'.</p> <p>Scenarios 2 & 3 - regard should be made to the difference in permitted development rights in AONBs under detailed guidance.</p> <p>Table 1, scenario 4 should refer to solar parks and large scale roof mounted solar panels.</p> <p>Suggest that the word 'may' in bullet point 4 that reads 'detailed landscape assessments and mitigation plans may be necessary' should be changed to 'will'.</p>	<p>Support welcomed.</p> <p>The SPG does not have the power to insist on when a DAS is and is not required. This requirement is outlined in The Town and Country Planning (General Development Procedure) (Amendment) (Wales) Order 2009.</p> <p>The WHS status as article 1 (5) land only applies in England as outlined in the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008.</p> <p>Agreed.</p> <p>Comments noted. However, this SPG is about the WHS not the AONB.</p> <p>Agreed.</p> <p>Comments noted. However it is considered unreasonable to always require this type of assessment as it might not always be required.</p>

	<p>Para 8.1 should provide more detail to the mentioned River Dee SAC, and make the clear the general point about the requirements to consult with CCW/NE over SSSIs& consider likely effects on SAC.</p> <p>Para 8.5 requires changing as the AONB extension was confirmed in November 2011.</p> <p>Appendix 2. The second set of bullet points relating to the character of the World Heritage Site and Buffer Zone appraisals of development sites should consider- 'impacts on landscape character and natural beauty.</p>	<p>Agreed. We will add an additional paragraph</p> <p>Agreed. This paragraph will be reviewed as a result of formal confirmation of the AONB extension.</p> <p>Agreed</p>
5. Peter Longlands, (via email)	<p>Llangollen needs to have an economy not based on tourism alone. Tourist based jobs are notoriously low paid and seasonal. Concerned about employment opportunities in Llangollen.</p> <p>The WHS designation could significantly weaken the future of Llangollen and lead to stagnation.</p>	<p>Comments noted. This document, alongside policies at the national level and in DCC's emerging LDP, will help to ensure the economic base of Llangollen remains varied, broad, and therefore more resilient.</p> <p>This document does not have a presumption against the principle of development outright. It looks to ensure high quality development occurs that is aware of its context and impact in relation to the WHS & BZ</p>
6. Barbara Morgan & Diane Clarke, Network Rail,	<p>No comments to make as little reference to transportation issues in the SPG. Forwarded a copy of Network Rail's Route</p>	<p>Comments noted.</p>

	Utilisation Strategy (November 2008) which sets out the company's strategic vision for the future of railway in the WHS & BZ area.	
7. Cllr Lucy Morris, (via email)	Supports the document. Considers it is important for applicants to have a clear understanding of any requirements and restrictions as a result of the WHS, and appreciates the importance of the WHS for tourism and for future generations.	Support welcomed.
8. Tony Hughes, AONB JAC, Loggerheads Country Park, Mold, CH7 5LH	Supports the document and commends the local authorities in preparing it.	Support welcomed.
9. Lorna Rogers, Natural England (via email)	Our address has changed.	Noted.
10. Chris Parrot, (address not provided)	<p>Has a concern that the additional bureaucratic procedures and time delays, and therefore cost considerations, may be a further disincentive to growth.</p> <p>General Guidance in the SP (6) states a DAS is required for all new build, redevelopment and even small residential extensions, and if not a supportive explanation to accompany a planning application.</p> <p>8.4- Removal of permitted development rights- need to notify all owners.</p>	<p>The WHS & BZ designation has been in place since June 2009. The WHS SPG does not introduce any new requirements and procedure. The purpose of the WHS SPG is to help improve the quality and speed of the planning process.</p> <p>The requirement for a DAS is already a standard national requirement. Supportive text with an application that does not require a DAS is not mandatory, but will be encouraged.</p> <p>This is not being proposed by the SPG.</p>

	<p>8.8- Environmental Impact- Further and substantial cost- viability of development.</p> <p>Llangollen needs to attract & encourage development and channel it in the right direction, not give off an impression of 'don't come here we don't want any change'.</p>	<p>This is already an existing planning requirement for certain types of planning applications.</p> <p>Agreed. The WHS SPG does not rule out the principle of development, rather it looks to increase the quality of development.</p>
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