

- Additional text added to WHS SPG is shown by a **highlight**.
- Text removed from the WHS SPG is shown as a ~~strikethrough~~.

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</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</p>

	<p>arrival and history of the WHS are important to the integrity of the designation.</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>history of the site are fundamental elements of the appreciation of the site as a place of outstanding 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. The drafted informal guidance checklist should help clarify this query. Table 1 also 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</p>

		appropriate. The Council is confident that this approach, the guidance and policies it endorses will provide sufficient and proportionate protection to the designation.
3. Deborah Hemsworth, Environment Agency Wales,	'We note the contents of the document but, as it deals with matters outside our remit, have no comment to make'.	Comments noted.
4. Paul Mitchell, Countryside Council for Wales,	<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>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. Change proposed as below: <i>'Design siting and materials important.'</i> (page 6, table 1)</p> <p>Comments noted. However, this SPG is about the WHS not the AONB.</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>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>Agreed. Change proposed as below:</p> <ul style="list-style-type: none"> - Major tourism development such as Visitor Centre - Solar Parks (page 7, table 1, under 'development type') <p>Comments noted. However it is considered unreasonable to always require this type of assessment as it might not always be required.</p> <p>Agreed. Additional paragraph added:</p> <p>Designated Ecological Sites 8.8 The council has a duty to protect and conserve biodiversity in all of its functions, these protected habitats and species are afforded varying levels of protection under Statutory legislation. You are advised to contact your Local Authority and or Countryside Council for Wales as the development may impact on the River Dee SAC or any other designated site e.g. SSSI, SPA.(page 9).</p> <p>Agreed. As a result of formal confirmation of the AONB extension, the paragraph has been amended as below:</p> <p>8.5 Much of the World Heritage Site lies within landscape which has been assessed as having natural beauty of national significance. The assessment of pressures which affect the natural beauty of the area and the consideration of</p>
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	<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><i>mechanisms which enable landscape protection and enhancement, concluded that statutory designation as an Area of Outstanding Natural Beauty was the most appropriate mechanism. Designation brings with it statutory planning controls, a statutory management plan and community engagement within the landscape management and enhancement of the area. The Countryside Council for Wales approved a Draft Order in February 2011 and the making of the designation is currently under review by the Welsh Assembly Government, with a decision likely towards the end of 2011. The primary objective for designating the AONB is the conservation and enhancement of its natural beauty, great weight is given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area. (page 9).</i></p> <p>Agreed. Change proposed as below:</p> <ul style="list-style-type: none"> - establish how the development proposals sit within the character of the WHS and buffer zone in which it is located. - assess impact on landscape character and natural beauty.(page 15).
<p>5. Peter Longlands, (via email)</p>	<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</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</p>

	significantly weaken the future of Llangollen and lead to stagnation.	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
6. Barbara Morgan & Diane Clarke, Network Rail,	No comments to make as little reference to transportation issues in the SPG. Forwarded a copy of Network Rail's Route Utilisation Strategy (November 2008) which sets out the company's strategic vision for the future of railway in the WHS & BZ area.	Comments noted.
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)	Has a concern that the additional bureaucratic procedures and time delays, and therefore cost considerations, may be a further disincentive to growth.	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.
	General Guidance in the SP	The requirement for a DAS is

	<p>(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>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>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>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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