



Snowdonia National Park Authority Eryri Local Development Plan

Review Report

Spring 2023



REVIEW REPORT ON THE ERYRI LOCAL DEVELOPMENT PLAN

June 2023

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1 SUMMARY

- 1.1 This Review Report sets out the findings and conclusions of the Authority's review of the Eryri LDP (2016-2031) which was adopted on the 6th of February 2019. Local Planning Authorities are required to review their LDP at least every four years from the date of adoption to ensure that LDPs and their supporting evidence base are kept up to date to provide a sound and effective basis for making planning decisions.
- 1.2 The review has been informed by stakeholder engagement, which took place between 7th April 2023 and May 12th 2023. A draft Review Report was circulated to key stakeholders and was an opportunity to obtain their views on what should be considered as part of the review. A list of all the stakeholders that received a copy of the draft Review Report is included as an appendix to the Review Report. The draft Review Report was amended to take into account additional consideration raised by stakeholders.
- 1.3 This Review Report presents the findings and conclusions of the LPA's review. This Review Report sets out where the Eryri LDP is delivering and performing well, as well as identifying areas that are not being implemented or delivered as intended.
- 1.4 The strategy and policies in the adopted Eryri LDP have been reviewed having regard to:
- Annual Monitoring Report findings (AMR 2020, 2021 and 2022)
 - Other contextual changes and changes in evidence base
 - Changes in National legislation and National, Regional and Local Policy
 - Engagement with relevant officers within the Authority
- 1.5 The main findings from the Review Report are:
- The evidence provided within the Eryri LDP's third Annual Monitoring Report (AMR) (October 2022) highlighted that certain LDP policies and proposals were not being implemented as intended. In particular the Eryri LDP housing requirement figures and the affordable housing target set out in the LDP were not being delivered as intended.
 - Significant changes have also occurred in the planning policy context particularly at a national level with the publication of Future Wales and updated editions of Planning Policy Wales. The Eryri LDP's issues and considerations, vision, objectives, strategic and development policies will need to be reconsidered to incorporate the concept of placemaking and promote the National Sustainable Placemaking Outcomes.
 - It's fundamental that the replacement Plan Strategy provides a clear steer to actively reduce carbon, address the causes and effects of climate change and responds to the nature emergency
 - The environmental, social and economic impacts of the coronavirus have also had far reaching consequences and raise significant issues for future policy making in Eryri.
 - Changes will also be needed to individual policies to reflect the revised Strategy and to take into account updated national policy and guidance and relevant evidence.
 - The Eryri LDP's evidence base will need to be updated in line with the latest requirements of national planning policy and guidance to ensure an up to date and robust evidence base to inform the strategy, policies and proposals of the Replacement Eryri LDP.

- The Eryri LDP's Sustainability Appraisal, including Strategic Environmental Assessment, and Habitat Regulations Assessment, together with other impact assessments, will need to be reviewed.
- The Authority will continue to work collaboratively with other LPA's and explore further opportunities to undertake a joint evidence base to ensure consistency in approach to assist with future policy development at a local and regional level.
- The Eryri LDP will need to undertake a Full Revision procedure, rather than a Short Form Revision procedure to respond to strategic issues raised and significant changes in the planning policy context particularly at a national level with the publication of Future Wales and updated editions of Planning Policy Wales (PPW).
- The following table provides a summary of the review of each policy giving an overview of whether the policy is functioning effectively or whether it needs to be reconsidered. Chapter 6 and 7 elaborates on these policies.

Table 1: Summary of the review of each Eryri LDP policy

Policy	Summary of Review
Strategic Policy A: National Park Purposes and Sustainable Development	Will need to be reconsidered to incorporate the concept of placemaking and promote the National Sustainable Placemaking Outcomes
Strategic Policy B: Major Development	This policy is considered to be functioning effectively.
Strategic Policy C: Spatial Development Strategy	Reconsideration will need to be given as to how growth is distributed. The LDP will need to be revised to reflect the emphasis on the principles of placemaking and sustainable development, including the National Sustainable Placemaking Outcomes. The review of the Spatial Strategy will include stakeholder involvement and evidence gathering (including a revised settlement assessment). The Strategy will need to respond to the climate and nature emergencies, consider issues such as recovery from the Covid-19 pandemic and constraints such as future changes to TAN 15 flood development maps and phosphorous levels in Special Area of Conservation (SAC) riverine catchments.
Development Policy 1: General Development Principles	This policy is functioning effectively, however may need to be reconsidered to reflect updated national policies and guidance and to ensure consistency with other revised policies.
Strategic Policy Ch: Social and Physical Infrastructure in New Developments	Policy may need to be reconsidered to reflect updated national policies and guidance and updated evidence base. Need to ensure consistency with other revised policies.

Strategic Policy D: Natural Environment	Strategic Policy D will need to respond to the nature emergency. Will need to reconsider policy to reflect change from European Sites to National Site Network, along with changes to the national policy and guidance in relation to net benefit for biodiversity and the protection afforded to Sites of Special Scientific Interest and trees and woodlands, together with Green Infrastructure requirements. Will need to draw from the evidence base provided by the NRW Area Statements. Further consideration and assessments will also need to be undertaken regarding the issue of phosphates during the LDP review process.
Development Policy 2: Development and the Landscape	This policy is functioning effectively, however policy or more detailed guidance may need to be reconsidered to reflect updated Dark Skies guidance advice.
Strategic Policy Dd: Climate Change	Policy needs to be reconsidered to respond to climate emergency, national policy and guidance and evidence base.
Strategic Policy E (1): Minerals Safeguarding Policy	This policy is functioning effectively, will need to work closely with North Wales Minerals & Waste Planning Shared Service
Strategic Policy E (2): Large Scale Minerals Development	This policy is functioning effectively, will need to work closely with North Wales Minerals & Waste Planning Shared Service
Strategic Policy F: Waste	This policy is functioning effectively, will need to work closely with North Wales Minerals & Waste Planning Shared Service
Development Policy 4: Small-scale sites for household and inert waste	This policy is functioning effectively, will need to work closely with North Wales Minerals & Waste Planning Shared Service
Development Policy 5: Open Space and Green Wedges	This policy is functioning effectively. Consideration will need to be given towards 'Green Infrastructure Assessments' and the need to draw from the evidence base provided by the NRW Area Statements in order to consider how significant benefits can be delivered through green infrastructure. Need to consider the need for a specific policy on Green Infrastructure.
Strategic Policy Ff: Historic Environment	This policy is functioning effectively. Policy may need to be reconsidered to reflect any updates within the Historic Environment context. For instance, the previously Candidate World Heritage Site, The Slate Landscape of Northwest Wales, has since been designated as a World Heritage Site, as well as measures regarding the Climate Change Agenda, and any additional legislation and guidance.
Development Policy 6: Sustainable Design and Materials	Reconsider policy and elements within it in light of national planning policy/guidance, particularly in respect of sustainability and placemaking principles and the climate emergency.

Development Policy 7: Listed and Traditional Buildings	In reviewing the LDP, it will be necessary to consider appeal case APP/H954/A/21/3280822 and the 'Local Listing of Historic Buildings' letter, regarding Development Policy 7: Listed and Traditional Buildings.
Development Policy 8: Protection of Non Designated Sites	This policy is functioning effectively. Policy may need to be reconsidered in response to any amendments and developments within National Policy and Legislation.
Development Policy 9: Conversion and Change of Use of Rural Buildings	Amend to take into account new C3, C5, C6 Use Classes and updated evidence base. Consider affordable housing requirement, use of commuted sums and local market housing.
Development Policy 10: Advertisements and Signs	This policy is functioning effectively. This Policy may need to be amended to reflect any changes or updates within National and Local Policy, as well as the findings of the Conservation Areas Project in order to protect and improve the areas for the future. Ensure coherence with DP:18 in considering strengthening Welsh language policies in relation to Adverts and signs and new developments to promote the distinctive culture of Snowdonia and contribute to the Sense of Place.
Strategic Policy G: Housing	Revise policy to reflect reconsideration of the growth strategy and updated evidence of housing need within national and regional estimates and the Local Housing Market Assessment, alongside updated viability evidence. Reconsideration of allocations. Consider new policy approach of identifying affordable housing-led sites and local market housing.
Development Policy 30: Affordable Housing	Revise policy to reflect reconsideration of the strategy and updated evidence of housing need within national and regional estimates and the Local Housing Market Assessment, alongside updated viability evidence. Consider local market housing. Clarify policy on conversions within housing boundaries. Consider impact of new dwelling Use Classes. Re-examine housing development boundaries
Development Policy 11: Affordable Housing on Exception Sites	Consider exception sites options other than 100% affordable housing, such as open market or local market housing.
Development Policy 12: Residential Care Homes and Extra Care Housing	Consider Gwynedd and Conwy Housing Strategies and need.
Development Policy 13: Gypsy and Travellers Sites	Policy to reflect Gypsy and Traveller Needs Assessment. The policy is expected to continue to be supportive and flexible to the provision of sites where required.
Development Policy 14: Annexe Accommodation	This policy and supporting SPG is functioning effectively.
Development Policy 15: Extensions	Wording/interpretation of this policy may require reviewing and discussions are required with the Development Management Section on how the policy has been implemented.

Development Policy 16: Replacement of Existing Dwellings	Wording/interpretation of this policy may require reviewing and discussions are required with the Development Management Section on how the policy has been implemented. Consider amending criteria to make whole policy relevant to developments within settlements.
Development Policy 17: Removal of Agricultural and Holiday Accommodation Occupation Condition	Consider how policy interacts with new C3, C5 and C6 Use Classes and any Article 4 direction that is adopted.
Strategic Policy Ng: Community Services and Facilities	This policy is functioning effectively. Policy may require reviewing to reflect the principles of placemaking which includes the provision of community infrastructure. Consider reviewing policy to enable community led facilities and services.
Development Policy 18: The Welsh Language and the Social and Cultural Fabric of Communities	Consider strengthening Welsh language policies in relation to Adverts and signs and new developments to promote the distinctive culture of Snowdonia and contribute to the Sense of Place. Consider introducing wording on language enhancement (similar to that seen with biodiversity enhancement).
Strategic Policy H: A Sustainable Rural Economy	Consider how the land-use planning system can support the role of the foundational economy and home working and develop appropriate policies. Work has begun on a collaborative study (between Snowdonia National Park, Gwynedd Council and Anglesey Council) to look at reviewing and assessing the employment land provision to assist in forming the evidence base for the Eryri Local Development Plan. The results will help in forming the LDP's rural employment strategy and will indicate if the continuation of safeguarding employment sites is the way forward or if there is a need for additional sites or policy changes.
Development Policy 19: New Employment and Training Development	Work has begun on a collaborative study (between Snowdonia National Park, Gwynedd Council and Anglesey Council) to look at reviewing and assessing the employment land provision to assist in forming the evidence base for the Eryri Local Development Plan. The results will help in forming the LDP's rural employment strategy and to develop enabling policies.
Development Policy 27: Snowdonia Enterprise Zone	'Future Wales 2040' national plan highlights the potential of a SMR being located at Trawsfynydd in the future. It will be important for the Authority to be involved in future discussions about the possibility of the SMR being located in Trawsfynydd and the effects of the reactor and any associated developments on the character of the National Park's landscape, visual amenities, natural environment and biodiversity and cultural heritage of the National Park. Current ELDP policies recognise that this site could accept low carbon energy businesses and energy generation technologies, provided there are no negative effects on the landscape. Need to continue discussions and assess relevance of current policy.

Development Policy 20: Agricultural Diversification	This policy is functioning effectively. The uncertain future of the agricultural sector following Brexit and changes to the payment regime and their impact on communities within the National Park will need to be kept under review.
Strategic Policy I: Tourism	<p>There are developments within Policy and Legislation, as well as National, Regional and Local Context where this policy may need to be amended slightly in order to reflect the current guidance and context. It will be important that the following three core principles for a sustainable visitor economy as identified in Gwynedd and Eryri Sustainable Visitor Economy 2035: Strategic Plan are also reflected in future policies.</p> <ol style="list-style-type: none"> 1. Celebrate, Respect and Protect our Communities, Language, Culture and Heritage 2. Maintain and Respect our Environment 3. Ensure that the advantages to Gwynedd and Eryri communities outweigh any disadvantages
Development Policy 21: Tourism and Recreation	<p>There are developments within Policy and Legislation, as well as National, Regional and Local Context where this policy may need to be amended slightly in order to reflect the current guidance and context. It will be important that the following three core principles for a sustainable visitor economy as identified in Gwynedd and Eryri Sustainable Visitor Economy 2035: Strategic Plan are also reflected in future policies.</p> <ol style="list-style-type: none"> 1. Celebrate, Respect and Protect our Communities, Language, Culture and Heritage 2. Maintain and Respect our Environment 3. Ensure that the advantages to Gwynedd and Eryri communities outweigh any disadvantages
Development Policy 28: New Build Serviced Accommodation	Policy to be reconsidered to reflect national policy and guidance and current context to ensure that a range of different types of sustainable visitor accommodation are developed in Eryri. The loss of serviced accommodation in the local area, along with the loss of locally important buildings will need to be considered when reviewing the policy, and the implications for other policies, such as Development Policy 9: Conversion and Change of Use of Rural Buildings. It will also be important to consider the Gwynedd and Eryri Sustainable Visitor Economy 2035: Strategic Plan.
Development Policy 22: Chalet and Static Caravan Sites	This policy is functioning effectively, and no major implications have arisen by assessing this policy through Annual Monitoring Reports, with the findings indicating success in protecting and enhancing the environment and landscape with the various improvements to sites. Wording to be assessed and updated as appropriate to reflect any new evidence or changes in national policy.

Development Policy 23: Touring and Camping Sites	No major implications have arisen by assessing this policy through Annual Monitoring Reports, with the findings indicating success in protecting and enhancing the environment and landscape with the various improvements to sites. Wording to be assessed and updated as appropriate to reflect any new evidence or changes in national policy.
Development Policy 29: Alternative Holiday Accommodation	With the indicator within the past three Annual Monitoring Reports measuring the effectiveness of the recently adopted policy within the current Eryri LDP, Development Policy 29: Alternative Holiday Accommodation, reporting of consistent number of small-scale developments for alternative accommodation permitted over the last three monitoring periods (average 4 applications a year). It is considered that Development Policy 29 is implemented effectively. However, through the review, it will be necessary to ensure that the policy wording continues to be suitable for its purpose.
Development Policy 24: Retail	Retail assessments in Local Development Plans will be replaced by Town Centre Assessments. They should no longer look at retail need alone but encapsulate a wider array of use requirements, particularly in the employment, leisure and public service sectors. This will have implications for the plan review and also towards the designation of retail areas within the five main towns of the National Park. Consider implications of national policy and guidance.
Strategic Policy L: Accessibility and Transport	The policy should be reviewed to be in accordance with updated National transport guidance and principles, with promotion of ultra-low emission cars and active travel key areas. Local active travel initiatives could feed into the policy and be safeguarded or promoted
Development Policy 25: Visitor Car Parking	Consider increased pressures on visitor car parking due to increasing visitor numbers. Consider Higgett Report and Snowdonia Partnership initiatives, amend policy as required.
Development Policy 26: Telecommunication	This policy and supporting guidance are functioning effectively. Policy wording to be assessed and updated as appropriate to reflect any new evidence or changes in national policy.

2 INTRODUCTION

- 2.1 The revised Eryri Local Development Plan 2016-2031 (LDP) was adopted on the 6th of February 2019. The adopted Eryri LDP sets out the Authority's planning policies for the development and use of land in the National Park up to 2031.
- 2.2 Local Planning Authorities are required to review their LDP at least every four years from the date of adoption to ensure that LDPs and their supporting evidence base are kept up to date to provide a sound and effective basis for making planning decisions.
- 2.3 Evidence provided within the Eryri LDP's third Annual Monitoring Report (AMR) (October 2022) highlighted that certain LDP policies and proposals were not being implemented as intended. Significant changes have also occurred in the planning policy context, particularly at a national level with the publication of Future Wales - the National Plan 2040 in February 2021 as well as updated editions of Planning Policy Wales (PPW). The LDP will need to be revised to reflect the emphasis within these documents on the principles of placemaking and sustainable development, including the National Sustainable Placemaking Outcomes. The environmental, social and economic impacts of the coronavirus have also raised significant issues for future policy making in Eryri.
- 2.4 The above factors have led to the need to trigger review of the adopted Eryri LDP. On this basis, on the 19th of October, 2022 the Authority's Planning and Access Committee agreed on the need to undertake a review of the Eryri LDP 2016-2031.

The Review Process

- 2.5 A draft Review Report was prepared by the Authority to obtain the views of key stakeholders on what should be considered as part of the review. The draft review report included information on what the Authority perceived as the main issues which should be addressed. The draft report was considered by the Authority Members Working Group and the Authority's Planning and Access Committee before obtaining the views of the Eryri Forum and key stakeholders as identified in Appendix 1. Consultation on the Draft Review Report took place between 7th April 2023 and May 12th 2023. The comments received in response to the consultation are summarised in Appendix 4. Following engagement with key stakeholders, the draft report was revised to take into account additional considerations raised before finalising the Review Report. The Authority's Planning and Access Committee approved the Review Report on 28th of June 2023 before it was submitted to the Welsh Government and published.
- 2.6 The Review Report sets out the findings and conclusions of the Authority's review of the adopted Eryri LDP. It sets out where the LDP is delivering and performing well, as well as identifying areas that are not being implemented or delivered as intended. It also identifies areas that need to be updated to reflect changes to national planning policy and guidance, along with other relevant strategies and evidence. The LPA's review process is also required to conclude on which revision procedure is to be followed for the LDP, either a Full Revision (Replacement LDP) or a Short Form Revision. The finalised Review Report will form an important part of the evidence base for the Replacement LDP.

Structure and content of the review report?

2.7 The Review Report has been structured to address the requirements of national guidance within Development Plan Manual Edition 3 (DPM3). The report sets out:

- The information that has informed the review: Findings of the Eryri LDP Annual Monitoring Reports (Chapter 3), other contextual changes and changes in evidence base (Chapter 4) and Changes in National legislation and National, Regional and Local Policy (Chapter 5)
- A detailed consideration of the impact of these findings on the LDP's vision, aims and objectives, including implementation of the LDP strategy (Chapter 6).
- A detailed review of each LDP topic area, identifying what needs to change and considers the implications for those parts of the LDP not proposed to be amended in terms of coherence and effectiveness of the plan as a whole (Chapter 7). The Review Report also identifies which parts of the evidence base require updating to support the changes (Chapter 8).
- The proposed re-consideration of the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) to assess the impacts of the Replacement LDP, with consideration given to undertaking an Integrated Sustainability Appraisal (Chapter 9)
- The opportunities to prepare Joint LDPs with neighbouring LPAs, and to work collaboratively on approaches and evidence, including in preparation for regional Strategic Development Plans (SDP) (Chapter 10)
- Conclusions based on the review process and explains whether a Full Revision (Replacement LDP) or a Short Form Revision of the LDP is anticipated and the reasons for this (Chapter 11)

3 ANNUAL MONITORING REPORT FINDINGS

- 3.1 Monitoring the Eryri LDP is a continuous process and does not end once plan is adopted. The Annual Monitoring Report (AMR) demonstrates the extent to which the Eryri LDP strategy is being achieved, whether the policies are working or not or where there is a policy 'void'. The AMR also provides an opportunity to capture the prevailing economic, social or cultural circumstances and contextual changes since the Plan was adopted. It is essential the conclusions in the Review Report can be strongly justified and evidenced in line with the findings of Annual Monitoring Reports (AMR). The 3rd Annual Monitoring Report (AMR), covers the period April 2021 to the end of March 2022 and was submitted to Welsh Government and published end of October 2022. The two previous AMRs covered the period 1st April 2020 to 31st March 2021 and 1st April 2019 to 31st March 2020.
- 3.2 The Eryri LDP (2016-2031) has an adopted monitoring framework in place to inform findings in the AMR. Indicators, targets and trigger levels have been identified to assess the performance of policies and objectives. The triggers included in the monitoring regime gives an indication on the performance of the Plan and how wide ranging a Plan review may need to be. When trigger points are activated, investigation is required to understand why policies and proposals are not being implemented as intended and determine what action will be necessary. The following actions have been included for each indicator in the AMR to provide clarity on the steps to be taken
- 3.3 There are 76 indicators in the Eryri LDP monitoring framework. The majority of indicators (62) demonstrated positive policy implementation. However, 3 indicators required additional training while 11 indicator targets were not being achieved and trigger points were reached. This shows that there are LDP policies that are not functioning as intended. In these instances the AMR has recommended actions, including further investigation and research and in some cases the review of a policy.
- 3.4 A summary of the outcomes of the monitoring indicators detailed in the third AMR (October 2022) is provided in Table 2.

Table 2: Summary of the outcomes of the monitoring indicators

Continue Monitoring	62	.
Training Required	3	MF21 - Monitor planning applications coming forward within the World Heritage Site or essential setting and Candidate World Heritage Site. MF44 - Number of Community & Linguistic Statements submitted MF45 - Monitor the effectiveness of the Community and linguistic statement and the Community & Linguistic Impact Assessments.
Supplementary Planning Guidance (SPG) Required	0	
Further Investigation/Research Required	5	MF33 - Monitor uptake of affordable housing in smaller settlements. MF34 - Number of affordable housing units granted planning permission and completed per annum on exception sites. The exception

		<p>sites are not included in the housing requirement figure.</p> <p>MF35 - Monitor the size of sites coming forward and the number of units proposed on each site.</p> <p>MF36 - Monitor the affordable housing targets and thresholds of sites coming forward.</p> <p>MF47 - Encouraging the use of Welsh place names for new developments.</p>
Policy Review Required	3	<p>MF29, MF30 - Number of affordable housing units granted planning permission via windfalls.</p> <p>MF31 - Number of affordable housing units granted planning permission per annum via conversions.</p>
Plan Review	3	<p>MF24 - Number of consents granted and new houses completed annually.</p> <p>MF26 - Number of affordable housing units granted planning permission per annum.</p> <p>MF27 - Number of affordable housing units completed per annum.</p>
Not Applicable to this AMR Period or superseded	0	

- 3.5 The following section outlines which policies are being achieved and which ones are not being implemented as intended across the Eryri LDP by Chapter heading and gives an indication on the performance of the Plan and how wide ranging a Plan revision may need to be.

Protecting, Enhancing and Managing the Natural Environment

- 3.6 Some key findings from the 'Protecting, Enhancing and Managing the Natural Environment' chapter within the annual monitoring report are included below. These results range across three separate AMR periods (2019/2020, 2020/2021, 2021/2022). In AMR 2021/2022 it was noted that no significant loss of undeveloped coast was observed, and this was also true for the previous two AMR studies. This was also the case in terms of areas of SPA, SAC, SSSI or Ramsar sites lost to development. No areas of SPA, SAC, SSSI and RAMSAR are negatively affected during any of the three relevant AMR time periods. This demonstrates that Development Policy 2: Development and the Landscape is working effectively and protecting the relevant areas of the National Park from adverse effects. However, it is considered that more could be done to protect Eryri's Dark Skies through the implementation of policy and to provide further guidance to businesses and communities on how they can create an environment that supports dark skies through the planning process as well as raising awareness on permitted developments.
- 3.7 The National Park's AMR looks at Areas of open space (68.5 ha) and green wedge (54.7 ha) to ensure that Development Policy 5: Open Space and Green Wedges is being implemented effectively. Across the three AMR's, no significant loss was observed in terms of open space areas and no inappropriate and/or new development were permitted within areas of Green Wedge. This demonstrates that Development Policy 5: Open Space and Green Wedges is effective in its purpose.

Protecting and Enhancing the Cultural and Historic Environment

- 3.8 Considering the findings of the Annual Monitoring Reports since the adoption of the Local Development Plan 2016-2031, there are no major implications for the revision of the LDP in this section, as the policies within this chapter have been implemented successfully.

Promoting Health and Sustainable Communities

- 3.9 Within this chapter, there were six monitoring indicators that require strategy and policy issues to be addressed as part of the LDP review process.
- 3.10 The Housing Trajectory included within the AMR shows an annual shortfall against the Annual Anticipated Housing Requirement (AAR) during 2021/22 with the years' completions 38 units below what was anticipated (51 AAR vs 13 actual completions, -75% in percentage terms). The number of dwellings that have been completed annually have been consistently below the (AAR) of 51 dwellings per annum since 2016-17. There is a shortfall of -42% for cumulative required build rate from the start of the plan period, 2016-17, up to 31st March 2022. The plan is falling significantly short of what is intended. Provision of homes is a key element of the plan's strategy. With persistent low numbers of units coming forward and being completed, the development plan's housing requirement figures are not being delivered.
- 3.11 The number of affordable housing units granted planning permission and completed per annum have been below the target of 21 units for 3 consecutive years and both targets have been triggered. A policy review is required as affordable housing numbers are not being delivered. Provision of affordable homes for local communities is a key element of the plan's strategy. The AMR housing numbers over the first 3 years of monitoring (and further) demonstrates that in the current economic climate, the low number of private sector housing development is not delivering sufficient affordable housing within the National Park. Monitoring also emphasises that affordable housing delivery within the National Park is heavily dependent on Housing Associations. No private allocations are coming forward for development, and therefore do not provide a contribution of affordable housing. There are no large private sector allocations, windfall sites or exceptions sites coming forward, meaning the required % contribution of affordable housing from such sites is not being provided.
- 3.12 No affordable housing units have been permitted or completed on exception sites and the targets have been triggered. Suitable land owned by housing associations have already been allocated in the development plan, as opposed to being brought forward as exception sites. The viability of affordable housing requirements and the need for a S.106, plus difficulties obtaining a mortgage, may be discouraging development, coupled with other wider economic factors. It may be necessary to review the exception site policy as it has not made a contribution to the affordable housing stock.
- 3.13 With only two permissions granted over the first three years of monitoring, the target of 3 permissions of affordable units granted permission via conversions has not been met and a policy review is required. Over the three-year period, three permissions for conversions resulted in a payment of a commuted sum to contribute towards affordable housing within the National Park. The fund is currently at around £500,000 of contributions since 2012, with approximately £170,000 spent to date. The Authority prefers that affordable housing for local needs is provided on site. The payment of

commuted sums will need to be considered further as part of the revisions to the Eryri LDP.

- 3.14 The target for affordable housing permissions and completions of windfalls has not been met for the first three years of monitoring. The expected contribution of windfalls in the plan may also needs to be reviewed as part of the housing strategy.

Supporting a Sustainable Rural Economy

- 3.15 The AMR measures if there has been an increase in new employment floor space within the Local Service Centres of the National Park and therefore tests the effectiveness of Strategic Policy H: A Sustainable Rural Economy. No new employment floor space was built in Local Service Centres (Dolgellau and Y Bala) in any of the three AMR periods. Work has begun on a collaborative study (between Snowdonia National Park, Gwynedd Council and Anglesey Council) which will look at reviewing and assessing the employment land provision to assist in forming the evidence base for the Eryri Local Development Plan revision.
- 3.16 The AMR also looks at the total new employment floor space built in the National Park (including conversions). Approximately 3665.37m² of new employment floor space (including conversions) were permitted during the time period of the three AMR's, which means the policy was effective in its purpose of increasing employment floorspace. The Eryri AMR also looks at the number of additional jobs created. Across the three AMR periods, the actual number of additional jobs created is unknown, but the increase in employment floor space suggests that an increase has been seen in the additional number of jobs in the National Park in all three AMR periods. This indicates that the development plan policies (SPH, DP19, DP 9 and DP24) were implemented effectively.
- 3.17 The amount of employment land (ha) and floor space (sq m) redeveloped to other uses is also measured within the AMR. This is an indicator designed to prevent the loss of employment land/floorspace to other uses. No loss of employment land/floorspace was seen in any of the three AMR periods which indicates that the development plan policies (SPH, DP19 and DP 9) were implemented effectively.
- 3.18 The Eryri AMR looks at Employment land and premises vacancy rate. An update to the Employment background paper was completed during 2017 that concluded that no more employment land would need to be allocated within the National Park. This was because there were many vacant units in employment sites within the Park and numerous vacant and available sites outside the Park that could be used for employment purposes. Work has begun on a collaborative study (between Snowdonia National Park, Gwynedd Council and Anglesey Council) which will look at reviewing and assessing the employment land provision to assist in forming the evidence base for the Eryri Local Development Plan review.
- 3.19 Development Policy 27: Snowdonia Enterprise Zone, of the Eryri LDP, supports appropriate development on the Llanbedr and Trawsfynydd sites, which would lead to employment opportunities that would sustain and enhance a mix of skills in the local work force. As part of the process of monitoring this Development Policy, the AMR looks at monitoring the de-commissioning of Trawsfynydd Nuclear Power Station and the possible alternative uses for consideration in review. It was announced during June 2020 that the Trawsfynydd site had been selected to lead on Magnox's reactor decommissioning project in the UK. This will see decommissioning work brought forward and secure employment in the area. It is envisaged that there will be a programme of

20 years at the site, with three main phases. In order to ensure that the National Park are kept up to date with the latest developments within the Trawsfynydd site, Policy officers are part of the Trawsfynydd Strategic Site Group meetings as well as the UK wide Nuleaf (nuclear legacy advisory forum) groups. An additional Nuleaf group has recently been set up with a Welsh focus. Currently there are ambitions to bring forward a programme which would involve construction of a Small Modular Reactor (SMR) at the Trawsfynydd site, with on-site preparatory work to begin in 2027. Current Eryri LDP policies recognise that this site could accept low carbon energy businesses and energy generation technologies, provided there are no negative effects on the landscape. The AMR looks at the types of development coming forward within the Snowdonia Enterprise Zone (Llanbedr or Trawsfynydd). One application for development within the Snowdonia Enterprise Zone was received during the period of the 2021/2022 AMR. This was for the construction of a temporary office at the Trawsfynydd Decommissioning Site. No applications were submitted with regards to the Llanbedr Airfield site and no further developments were made in the preparation and submission of a landscape led masterplan for the site.

- 3.20 As part of measuring the effectiveness of Strategic Policy H: A Sustainable Rural Economy, an indicator monitors the number of applications for appropriate live-work units / Number of applications for home working within the National Park. In total, six applications were permitted across the three AMR periods (one in 2019/2020 and five in 2020/2021).
- 3.21 The AMR monitors new retail floor space within the main built up areas of Local Service Centres, Service Settlements and Secondary Settlements as part of measuring the effectiveness of Development Policy 24: Retail. Four applications were permitted for new retail floorspace within the three AMR periods. No concerns were raised in terms of the trigger point (which was 1 new development outside these areas for 3 consecutive years or 3 new developments outside these areas in 1 year), which demonstrates that Development Policy 24 is being implemented effectively in this regard. The number of new retail developments intended to serve a wider settlement catchment area limited to Bala and Dolgellau is monitored within the AMR. No new retail developments, intended to serve a wider settlement catchment area limited to Bala and Dolgellau, were permitted during all three relevant monitoring periods. This is in line with the policy and the trigger point of “1 new development outside these areas for 3 consecutive years or 3 new developments outside these areas in 1 year” was not met, suggesting that the policy is being implemented effectively.
- 3.22 Another monitoring indicator within the Eryri AMR which tests the effectiveness of Development Policy 24 is an indicator which looks at the number of new retail developments situated within the main retail area or within 300m of the town centre. As a result, one new retail development was permitted within the main retail area or within 300m of the town centre of a Local Service Centre during the three monitoring periods. Again this is in line with the policy and the trigger point for action is not met.
- 3.23 A key indicator of measuring the effectiveness of Development Policy 24: Retail, within the AMR, is one which looks at vacant units in retail areas. The number of total vacant units in the five towns surveyed over the three AMR periods included the following. 2019/2020 = 24; 2020/2021 = 36; and 2021/2022 = 34. In 2021/2021 the average vacancy % for the five towns within the Park was 9.2% (which was lower than 2020/2021's average percentage, which was 10.6%. This showed an decrease in the % of vacant units in all main settlements within the National Park (apart from Dolgellau which saw an increase in the percentage of vacant units). This could possibly be due to a recovery from early on in the Covid 19 pandemic, where many businesses had to close during this period as well as an increase in the popularity of independent shops in

recent years.. The end of large scale lockdowns, and the large scale vaccination of the public may have given added confidence to businesses during 2021/2022 compared to the previous time period of 2020/2021. The target for the policy and/or monitoring indicator is to reduce or maintain vacancy rate and it is considered that this target is met on the whole when considering the impact of the Coronavirus pandemic.

- 3.24 The percentage of non-A1 retail uses in main retail areas of Aberdyfi, Bala, Betws y Coed, Dolgellau and Harlech is measured in the AMR. Development plan policies were noted as being implemented effectively in this regard, and it is also noted that Welsh Government now note that centres should now become places where a variety of retail, employment, commercial, community, leisure, health and public sector uses come together in a hub of activity to make them viable as go-to destinations once more. Primary retail areas and related policy will need to be considered further as part of the revision.
- 3.25 Policies within the Local Development Plan support tourism and outdoor recreation that maximise local economic benefits. A number of applications have been approved since the adoption of the LDP 2016-2031, that have resulted in improvements to tourism facilities.
- 3.26 The AMR measures the number of new or improved tourism facilities, with the target of increasing the number of appropriate schemes approved. The latest AMR (2021-2022) reports of 29 applications, relative to tourism, were granted permission, whereas 18 applications were granted permission during 2020-2021, and 17 applications were granted during the 2019-2020 monitoring period. This therefore shows success as the number of schemes that were approved increases from year to year. The types of developments that were allowed were improvements to static and touring sites, improvements to various tourism facilities, and sustainable developments offering a new type of visitor accommodation within the Park, namely low impact alternative holiday accommodation.
- 3.27 Despite this, another indicator within the AMR, measures the effectiveness of recently adopted policy within the current Eryri LDP, Development Policy 28: New Serviced Accommodation, reports that no applications for new build serviced accommodation were permitted within or adjacent to the main built up areas of local service centres, service settlements and secondary settlements within the last three monitoring periods. There are cases where there is a change of use of dwelling (Use Class Order Class C3) to serviced accommodation (Use Class Order Class C1), but although it can be argued that the policy is being implemented effectively, it is necessary to ensure that a range of different types of sustainable visitor accommodation are developed in Eryri. During the last monitoring period (2021-2022), three applications were for the change of use of existing serviced accommodation to self-serviced holiday accommodation, resulting in the loss of serviced accommodation provision within the National Park. Additionally, this decline in the existing serviced accommodation, has also seen the loss of locally important buildings, such as the demolition of the St. David's Hotel, Harlech in 2019, which was once a large twentieth century building overlooking the beach and World Heritage Site Castle in Harlech The loss of serviced accommodation will need to be considered when reviewing the visitor accommodation policies of the Local Development Plan. It will be necessary to consider the current provision of existing serviced accommodation and the implications for other policies, such as Development Policy 9: Conversion and Change of Use of Rural Buildings. For instance, there were also 5 applications permitted for the conversion of agricultural buildings to self-serviced holiday accommodation. With the growth in self-serviced accommodation developments, it will be necessary to be considerate in ensuring a wide range in the

provision of visitor accommodation, and in ensuring the protection of key buildings in the most effective and sustainable manner.

- 3.28 The second recently adopted policy within the current Eryri LDP, Development Policy 29: Alternative Holiday Accommodation, ensures small scale developments for short-term holiday alternative accommodation providing that the site is part of an agricultural diversification scheme or is ancillary to a new or existing tourist attraction and does not become the main attraction in order to supplement a successful rural economy; whilst also ensuring that the proposed development does not cause significant harm to landscape character, fits unobtrusively within the landscape and is well screened by existing landscape features. This would also ensure that the proposed development does not lead to the creation of a new vehicular access or parking areas that would adversely affect landscape character, with any ancillary facilities should be located within an existing building or as an extension to existing facilities. A key indicator measuring the effectiveness of Development Policy 29: Alternative Holiday Accommodation, reports of consistent number of small-scale developments for alternative accommodation permitted over the last three monitoring periods (average 4 applications a year). It therefore suggests that Development Policy 29 is implemented effectively. Despite this, there is anecdotal information that there are a number of similar unauthorised developments around the National Park. It will be necessary to investigate further when reviewing the LDP, in order to determine if any policy amendments are required.

Promoting Accessibility and Inclusion

- 3.29 The AMR looks at monitoring the number of telecommunication developments that do not harm the visual appearance and character of the area. There were 16 new telecommunication developments permitted over the time period of the three AMR's. The trigger point for this indicator was a 'failure to deliver', therefore Development Policy 26: Telecommunications can be considered to be implemented effectively.
- 3.30 No permissions have been granted for the development types monitored by the AMR, which are permissions granted for new visitor car parks within and outside Local Service Centre. One application was refused within a Local Service Centre. Given the context of increased pressures on visitor numbers and the resulting car parking problems that has been seen since the pandemic, the low number of applications received, and lack of permissions granted under the relevant policy needs to be taken into consideration.

Use of Eryri Local Development Plan Policies

- 3.31 There are 46 policies within the adopted LDP 2016-2031. 40 policies have been taken into consideration since the Plan was adopted in 2019. The policies that have not been used are the following;
- Strategic Policy Ch: Social and Physical Infrastructure in New Developments
 - Strategic Policy Dd: Climate Change
 - Strategic Policy E (2): Large Scale Minerals Development
 - Strategic Policy E (3): Removal of Slate Waste and Building Stone Quarries
 - Development 12: Residential Care Homes and Extra Care Housing
 - Development 13: Gypsy and Travellers Sites

3.32 The fact that these policies have not been utilised does not necessary mean that there is no need to include them in the Replacement Eryri LDP. It might be the case that the authority have not received a particular type of application since the Eryri LDP was adopted. It is considered that the Climate Change policy needs to be reviewed and that further detailed guidelines are needed to give clear direction to actively reduce carbon and be more proactive in mitigating and adapting to the effects of undesirable change as well as taking active steps to increase carbon sequestration of natural systems including woodlands, peatlands and carbon soils.

4 OTHER CONTEXTUAL CHANGES AND CHANGES IN EVIDENCE BASE

Exit from the European Union

- 4.1 Although the true impact of Britain's exit from the European Union is still unclear, Brexit is likely to have a significant impact on food, farming, fishing and environment sectors. These sectors are important to the National Park rural economy and the viability of our local communities and are vital to support the sustainability of the Welsh language.
- 4.2 Exit from the European Union also resulted in an increase in visitors deciding to stay in the UK putting huge pressure on the National Park area and highlighting the need for a better balance in the visitor economy. The visitor economy has an important contribution to make to the economy and communities of Eryri - this contribution needs to be balanced and sustainable in order to protect our communities, our environment, language and culture for future generations.
- 4.3 Policies will need to be updated to reflect changes arising from the UK's withdrawal from the European Union whereby 'European Sites' are now referred to as 'National Site Network'.

Coronavirus pandemic

- 4.4 It's also important to understand the implications of the coronavirus pandemic on the National Park area. The economy came to a standstill with non-essential shops and businesses having to close overnight. Following the relaxation of restrictions after the first lockdown, the National Park saw an increase in visitor numbers above previous years, as more decide to take their holidays within the UK. This resulted in significant pressures on visitor management and the environment. This led to an increase in traffic and parking along with the occurrence of wild camping and camper vans/motor homes parking up on side of the roads / car parks overnight.
- 4.5 The increasing pressures on the local housing market exacerbated by Covid 19 and the resulting impact on the sustainability of local communities suggests that future LDP policies may need to focus on achieving accessible local market housing and affordable housing.
- 4.6 Overnight, we saw a substantial increase in home-working, which triggered an increased demand for properties from outside the local area from those who wish to have a more balanced life when working from home resulting in potential conflict with local residents about the availability of properties. An increase in home working can also be an opportunity for young people to return to their local area. The demand for second home and holiday accommodation has also pushed prices up with more permanent resident dwellings being used as holiday accommodation thus reducing the available stock for local communities.
- 4.7 The pandemic has highlighted the importance of health and well-being, access to services, economic resilience, digital connectivity and the value of the natural environment. We've seen a renewed value placed on the provision of local services, local food chains, and local quality green space as well as the need for sustainable, low carbon developments and infrastructure to respond to the climate and nature emergencies. The LDP review will need to ensure that people are able to live locally and that communities become more sustainable and resilient into the future.

- 4.8 The Replacement LDP process will enable the LPA to respond to the impact of the pandemic on all elements of the LDP, and as part of the supporting evidence and assessments.

Cost of Living Crisis

2022 saw the onset of the cost of living crisis within the U.K., and in the months that followed this has become a growing and deeply damaging problem for the general population. Rising costs in terms of fuel, energy, housing and food for example have been increasing much faster than wages and welfare payments. This has created hugely negative impacts in terms of physical, mental health and financial health for a huge number of communities and people in Wales. The crisis has also had an impact on the housing situation, as interest rates and inflation mean mortgages have gone out of the grasp of a large number of people.

The cost of living crisis follows over a decade of austerity, the effects of Brexit and also the coronavirus pandemic, so what was a very painful situation for much of the population of the U.K., Wales and the National Park is now exacerbated. To add to the crisis, in terms of trying to form effective responses, the last decade of austerity has put increasing pressure on the public sector and services which therefore means reduced capacity to tackle the problems and try to help communities effectively. The cost of living crisis is also driving up the cost of doing business, putting many employers, particularly small businesses, under additional pressure.

Overall Housing Market

- 4.9 There are no regional house builders active in the market in the National Park area and therefore there is very limited speculative building of open market and affordable housing. The housing market in the National Park is localised in nature, relying on small local builders and self-build projects on small sites. The uncertainty over borrowing in recent years could dissuade developers, small builders, and self-build projects from proceeding with plans to invest or seek consent and construct houses, which may currently impact the rate of housing development. During the 2020/21 period, housing permissions and completions increased over the previous years' low numbers. Permissions and completions fell again to a very low level during 2021/22. It is considered that the pandemic's impact has fallen mostly on the existing housing stock. A number of individual housing schemes with extant permission were also completed during the 2020/21 period.
- 4.10 A further factor that has become more prominent over 2021/2022 is the increase in the cost of building materials. Figures released by the Department for Business, Energy and Industrial Strategy show that on a UK level, the materials price index for 'All Work' increased by 25.2% in April 2022 compared to the same month the previous year. Construction material prices for new housing increased 22.5% over 2021/2022. Much of this can be attributed to global supply chain disruption, and there has been a shortage of workers within the construction industry. Brexit has also resulted in a decline in the UK's economy. The low number of completions over 2021/22 can be attributed to these factors. These factors may also be discouraging developers from submitting planning applications for dwellings. Increasing inflation, the cost of borrowing, the cost-of-living crisis, will all contribute towards lower levels of housing development.
- 4.11 The development of affordable housing by housing associations is also facing barriers. Through discussions with housing associations who operate within Snowdonia National

Park, it is understood that it is increasingly difficult to make schemes stack up financially, especially small schemes in rural areas. Housing Associations are finding it difficult to obtain building contractors to build small schemes and costs are higher with a lower profit margin. Increasing build costs exacerbates the problem. Schemes in smaller settlements are also more challenging to establish the need, especially for intermediate housing.

House Prices

4.12 Snowdonia National Park Authority receives data on house sales from the Land Registry; the data is in the form of all individual transactions within the Park boundary. The data shows a significant increase in house prices within the Park between 2019 and 2022. Covid-19 pandemic has led to an increase in homeworking and opportunities to live further away from the workplace. The quality of life and landscape offered by the National Park attracts those who wish to have a more balanced life when working from home which increases the demand on the local housing market. Brexit and Covid-19 pandemic made holidaying outside the UK difficult, increasing tourism levels within the UK. This led to more houses being bought as second homes or holiday rentals. Areas such as National Parks in particular are under pressure and the increase in competition for houses for sale may be leading to price increases. Whilst 'staycations' were more pronounced during the 20-21 seasons, these factors may still be having an impact, as covid-19 levels continue to fluctuate, and the cost-of-living crisis discourages holidaying abroad. Recent National and International economic developments may have further impact on house prices. It will be important to continue to monitor house price trends as it will influence affordable housing policy and the viability of housing developments.

Second homes and short-term holiday accommodation evidence

4.13 Council tax data received from the Local Authority provides the main source of information on the number of second homes and self-catering accommodation. The data shows the number of properties paying the second homes council tax premium and also self-catering properties paying non-domestic business rates. The data shows some communities with high levels of second homes and short-term holiday accommodation. The data and its trends will be a key source of evidence to consider implementing an Article 4 direction in order to control the new use classes for dwellings, second homes and short term holiday accommodation. It will be key evidence when considering changes to policies relating to housing and holiday accommodation.

4.14 The Welsh Government's raising of the threshold of the number of days a home can be let out as short-term holiday accommodation to qualify as non-domestic, may well have further impacts on the numbers, along with raises in the council tax premium for second homes (Cyngor Gwynedd are to increase the premium to 150%; the maximum possible being 300).

Air bnb

4.15 The use of properties used as 'Airbnb' accommodation is believed to have increased significantly in recent years. These properties do not always fall within regulatory remits; therefore, the true number may not be known, and may be significant. A survey by Cyngor Gwynedd in 2019 found that within the Dwyfor and Meirionydd areas, there has been a significant increase in the number of self-catering and Airbnb accommodation¹.

Accurate data on the numbers of various types of holiday accommodation would assist in formulating policies and SNPA will continue to work with partners to explore means of achieving this. A proposed statutory licence scheme for holiday accommodation would be very useful, although unfortunately may be some years away from being introduced.

Rental Properties

- 4.16 The availability of rental homes is becoming increasingly difficult. The Renting Homes Act 2016 came into effect in 2022, which requires landlords to meet higher standards, which may result in some landlords leaving the sector. Rental properties are being switched to holiday accommodation, which can be more profitable for the owner. Rents are increasing, along with inflation and the cost of living. Wages and benefits are stagnant. This provides a strong reason to control the loss of residential properties to holiday uses, which may be possible with future planning policy and legislation change.

Visitor Traffic and Car Parking

- 4.17 Since the summer of 2020, the National Park has experienced higher visitor numbers, leading to severe visitor car parking issues, in particular popular walking areas such as around Snowdon and the Ogwen Valley. The National Park, along with other agencies, have taken measures to attempt to control the situation in terms of management, education, and enforcement. However, a long-term policy and strategic approach is required to tackle the current situation which is undermining the core purposes and duties of the National Park. Multi agency coordination is happening in relation to traffic and transport use within the National Park, although a strategic and sustainable public transport and car parking solution has yet to be reached.

Wild Camping and Camper Vans/Motor Homes

- 4.18 Following the relaxation of restrictions after the first lockdown, the National Park saw an increase in visitor numbers above previous years, as more decide to take their holidays within the UK. This resulted in significant pressures on visitor management and the environment. This led to an increase in the occurrence of irresponsible wild camping and camper vans/motor homes staying overnight in areas such as laybys, car parks and private land for overnight stays, rather than formal sites. Motor home numbers and resulting pressures remained high during the 2021/22 period. Tourism is integral to the National Park economy and caravan and camping sites will have lost income during 2020 and will not have benefited from motor homes not using formal sites.
- 4.19 In the short-term various actions were taken by the Authority, in collaboration with the Local Authorities and other Bodies, on prevention, education and information. Eryri's current Local Development Plan policies do not permit any new camping or touring caravan sites (which includes campervans/motor homes) due to their effect on the landscape and Special Qualities of the National Park, the ELDP policies do however permit the extension of these sites (without the increase in pitches on chalet and static caravan sites) to achieve a clear overall environmental improvement. There are calls from some for the provision of small 'aires' sites for motor homes with basic facilities, for instance on car parks within settlements. Cyngor Gwynedd have announced they will be trailing 6 'Aires' sites over a period of 3 years, commencing

in spring 2023. These will be located on existing council owned car parks and will not include any within the National Park boundary. The Authority will consider and assess the situation and impacts when reviewing the relevant policy for the next LDP review. Any new policy would need to consider how it impacts upon wider strategic objectives, such as sustainable tourism and carbon footprint. The special qualities of the national park must be protected and enhanced. It remains to be seen if the increase in tourist visitor number and motorhomes is a long-term trend. If conditions make it once more convenient to travel outside the UK, visitor number could reduce from levels seen this year.

Population and Household Projections

- 4.20 The national 2018 based household projections for the National Park were published in May 2021. These projections estimate that between 2018 and 2028 the population of the Park will decrease by 1.92% which is a total of 480. During the same period the households in Snowdonia is projected to increase by 40 units (0.3%), a very modest increase within a 10 year period. It is projected that the number of one-person households will increase and continue to be the most common household type, accounting for 41.7% of all households in 2028. The number of all other broad household types are projected to decrease over the period, with larger household types projected to see a more marked percentage decrease. It is projected that the number of households with children will decrease from nearly 2,450 households to just under 2,160 households (a decrease of 4.2%), making up 17.8% of all households by 2028. A falling population and slower new household formation rates will reduce the need for more houses.
- 4.21 As these projections show a very small increase in the number of households in Eryri, and therefore a very small increase in the number of dwellings required it suggests a need to consider a lower housing requirement and provision figure which may be more suitable in a future review of the Eryri LDP. Whilst the housing requirement figure could be lower than that of the current plan, it would still need to provide a level of housing to meet the needs of local communities.

Census 2021 Population and Household

- 4.22 First results from the 2021 Census for England and Wales, which were published by the Office for National Statistics on 28 June 2022 include population and household estimates at a Wales and local authority level. Population and Household data have not yet been released for National Park areas,
- 4.23 The 2021 census data shows that the population of Gwynedd has decreased by -4,450 (-3.7%) since the last census in 2011, as well as a decrease of 1,350 (-2.6%) in households with at least one usual resident. Both the change in population and household numbers and the size of households will ultimately have an impact on future dwelling requirements in Local Development Plans (LDPs). Revised Welsh Government household projections – which will form a major part of the evidence needed when preparing LDP growth strategy – are unlikely to be produced before 2024. Current advice from Welsh Government’s Planning Directorate is to continue with plan preparation rather than delay the process.
- 4.24 The 2021 Census figures of population shows that the most recent officially produced population figure (2020 mid-year estimate of population, ONS) significantly overestimated the population of North Wales and each of its constituent local authority

areas. These Mid-year population estimates formed the basis of the 2018-based population projections so they will have been affected by the over-estimations too.

4.25 The 2021 Census therefore provides the opportunity to update understanding of the population and the publication of the 2021-based household projections (Welsh Government statistics) in 2024 will provide a clearer indication of impact on future dwelling requirements.

Census 2021 Welsh Language

4.26 In December 2022, the main points and headlines of the Census 2021 Welsh language questions were released. The questions asked within the Census about the language included asking people if they could understand spoken Welsh; speak, read or write Welsh. People could select a single skill, multiple skills, or no Welsh language skills.

4.27 The ONS published results included the following headlines;

- In 2021, an estimated 538,000 usual residents in Wales aged three years and over (17.8%) reported being able to speak Welsh, which is a decrease since 2011 (562,000, 19.0%).
- One of the main factors contributing to the overall decrease in the percentage of people who reported being able to speak Welsh between 2011 and 2021 was the decrease in children and young people aged 3 to 15 years who reported this skill.
- The percentage of usual residents aged three years and over able to speak Welsh decreased between 2011 and 2021 in all local authorities except Cardiff, Vale of Glamorgan, Rhondda Cynon Tâf, and Merthyr Tydfil.
- Among children and young people aged 3 to 15 years, the percentage who could speak Welsh decreased in all local authorities between 2011 and 2021

4.28 Whilst the Census results are disappointing, a different survey (The ONS' Annual Population Survey) showed that there had been a rise in the number of Welsh speakers, up to 899,000 in June 2022.

4.29 As a result of the decrease shown in the Census results, and the conflicting results shown in the ONS survey, the First Minister Mark Drakeford has outlined his intention to commission work to discover why there are conflicting figures. The Education and Language minister Jeremy Miles believed that part of the reason for the lower than expected results was due to the impact on children and young people's Welsh language skills when they were out of school during the Covid-19 pandemic, which was also the age group which saw a large decline in Welsh speakers.

4.30 The Census results however do indicate that national, regional and local policies should be strengthened in order to protect and enhance the use of Welsh language in the population and in everyday working life, and the LDP must be alert to this policy context.

Decarbonisation

4.31 During late 2020/early 2021 an Eryri Carbon Scrutiny Task and Finish Group was set up and a great deal of work has been undertaken over the past few years in order to look at how policies and strategies within the Local Development Plan and Cynllun Eryri;

- Contribute to producing CO2 and to what degree
- Actively reduce carbon and to what degree
- Contribute to the absorption of carbon and to what degree

- 4.32 The assessment of the current LDP concluded that the policies and strategies within it were effective in actively reducing carbon and that policies also contributed to the absorption of carbon. For example Policy Dd (Climate Change) within the plan enables the conservation and protection of woodlands, upland soils and peatland areas to assist in carbon retention. It is fundamental that the replacement Plan provides a clear steer and address the causes and effects of climate change. It is essential that future development is sustainably managed within the National Parks environmental and carbon limit. During May 2021, Dr Chris Jones (Tyndall Centre) produced a document entitled 'Setting Carbon Budgets for Snowdonia'. The document looked to present climate change targets for the National Park, informed by the latest science on climate change and defined in terms of science based carbon budget setting. The assessment concluded that in order for the National Park to make a 'fair' contribution towards the IPCC Paris Agreement, it needed to;
- Stay within a maximum cumulative carbon dioxide emissions budget of 1,201 thousand tonnes (ktCO₂) for the period of 2020 to 2100. At 2017 CO₂ emissions levels, this budget would be spent within 6 years from 2020
 - Initiate an immediate programme of CO₂ mitigation to deliver annual cuts in emissions averaging 14.2% to deliver a Paris Agreement aligned carbon budget. These reductions require national and local action, and could be part of a wider collaboration within the National Park
 - Reach zero or near zero carbon no later than 2039.
- 4.33 The Authority also commissioned Small World Consulting, to undertake an assessment of Snowdonia National Park's carbon footprint and a proposed pathway to net zero, the results of which will need steer the revised Eryri LDP.
- 4.34 The National Park Authority has set about forming a Carbon Strategy for the area, and it is hoped that this piece of work will be completed during 2024. This work will influence the strategies and policies of the Local Development Plan and Cynllun Eryri.

5 CHANGES IN NATIONAL LEGISLATION AND NATIONAL, REGIONAL AND LOCAL POLICY

- 5.1 Since the Eryri LDP was adopted in February 2019, planning policy context at a national, regional and local level has changed. New or updated planning legislation, policy, guidance and strategies have been released, including in other policy areas relevant to planning. This section focuses on identifying the most significant contextual changes that will need to be taken into account in revising the Eryri LDP. Reference to these changes and other relevant contextual changes can also be found in previous Annual Monitoring Reports (2020, 2021 and 2022).

National Legislation

The Local Government and Elections (Wales) Act 2021 (January 2021)

- 5.2 This Act replaces Strategic Planning Panels (SPP) the governance body set out in the Planning (Wales) Act 2015 to prepare a SDP with four mandatory Corporate Joint Committees (CJCs) covering each region - South East Wales, South West Wales, Mid Wales and North Wales. Eryri National Park lies within the North Wales Region. The North Wales CJC was established on 1st April 2021. The CJC must exercise functions relating to Strategic Development Planning, have functions relating to economic well-being and the development of regional transport policies.

Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021

- 5.3 The Town and Country Planning (Strategic Development Plan) (Wales) Regulations (SI 2021/360) were made on 18th March 2021 and came into force on 28th February 2022. The Regulations set out the procedure for the preparation of SDPs following on from The Local Government and Elections (Wales) Act 2021 (January 2021).

Socio-economic Duty (March 2021)

- 5.4 The Socio-economic Duty within the Equality Act 2010 came into force in Wales on 31st March 2021 and is aimed at encouraging better decision making and reducing inequalities resulting from socio-economic disadvantage. The duty requires relevant public bodies when taking strategic decisions, for example associated with strategic policy development and development plans, to have due regard to the need to reduce the inequalities of outcome that result from socio-economic disadvantage. The LPA will ensure that the duty is incorporated into the Impact Assessment process associated with revising the LDP.

National Policy

Future Wales: The National Plan 2040

- 5.5 Future Wales: The National Plan 2040 (the National Development Framework) was published in February 2021. Future Wales, which sets the direction for development in Wales between 2020 and 2040 is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities. Future Wales is a spatial plan, which means it sets a direction for where we should be investing in infrastructure and development for the greater good of Wales and its people. It sets the challenge of delivering these improvements to public, private and third sectors. It makes clear the importance of planning new infrastructure and development in such a way they are complementary rather than competing priorities, ensuring opportunities are maximised and multiple benefits are achieved. It will be important for future revisions of the Eryri Local Development Plan to be in conformity with Future Wales: The National Plan 2040.
- 5.6 The National Plan recognises the valuable role of culture, heritage and environment to the economy and emphasises that Snowdonia National Park, and designated World Heritage Sites *should be protected for the enjoyment of future generations and help to provide economic benefits for the region's communities*. The National Plan strongly supports the development of the foundational economy in the North Wales region which represents those parts of the economy which are integral to the well-being of places, communities and people and which deliver people's everyday needs. There is an expectation within the national framework for LDPs to develop a progressive, positive attitude towards enabling economic development, investment and innovation, with Welsh culture, heritage and environment playing a crucial role in the economy. It will be necessary to ensure that any amendments to this section within the LDP, will sustainably promote the rural economy without adversely affecting the heritage, culture and environment of Wales, as they are crucial to sustain, support and develop the economy.
- 5.7 In terms of energy production, the potential siting of a Small Modular Reactor (SMR) at Trawsfynydd is referenced within this document. The document notes that "Trawsfynydd is a potential site for a Small Modular Reactor, building on the existing sector-specific technical capacity and expertise available locally and creating a new nuclear industry growth zone. The site is in an unique position having previously been a former nuclear power station with the necessary infrastructure and local skills in place".
- 5.8 Future Wales 2040 also notes the commitment towards "developing a national forest through the identification of appropriate sites and mechanisms. Actions to safeguard proposed locations for the national forest will be supported". The Welsh Government has set a target to increase woodland cover in Wales by at least 2,000 ha per annum from 2020. New forest plantations is currently a land management matter and does not constitute development in planning terms. It is unclear at this stage how the national policy included in 'Future Wales – The National Plan 2040' will be applied through the planning process. In land management terms increasing woodland cover could have a considerable impact on the landscape of Eryri and the future sustainability of small family farms.
- 5.9 Future Wales: The National Plan 2040 highlights Welsh Government's ambition to see biodiversity enhancements across Wales and as part of the planning process and applications. Planning authorities need to ensure that developments minimise impacts

and provide opportunities for biodiversity enhancements, to allow species to adapt and/or to move them to more suitable habitats.

- 5.10 Future Wales also recognises the need to support the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services and highlights areas to improve regional connectivity such as Active Travel, Services, Metro and ultra-low emission vehicles.
- 5.11 Future Wales's policy on affordable housing states that through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing. Snowdonia National Park Authority is included within the North region for estimates of housing need until 2038. The national and regional estimates of need do not reflect future policies or events and are not a Housing Requirement for Wales or the regions. However, the estimates do provide part of the evidence and context on which housing policy and requirements can be based.

Planning Policy Wales updates Edition 10 (December 2018) and Edition 11 (February 2021)

- 5.12 Since the Eryri LDP was adopted Planning Policy Wales (PPW) has been updated to take into account the Well-being of Future Generations (Wales) Act 2015, including the seven well-being goals and the five ways of working. It has also been updated to promote the concept of placemaking within the planning system and sets out the National Sustainable Placemaking Outcomes. Revisions have been made to align with Future Wales and to take into account the socio-economic duty and the impacts of the Covid-19 pandemic. It also reflects policy changes to housing land supply, affordable housing-led sites, development quality standards, local energy planning, transport and active travel. PPW requires planning authorities must set out in their development plan an integrated planning and transport strategy to inform the spatial strategy and overarching strategy of the development plan.

Placemaking Charter

- 5.13 Within edition 11 published in February 2021, the PPW adopted the Placemaking Charter, The Placemaking Wales Charter has been developed to reflect the collective and individual commitment of organisations to support the development of high-quality places across Wales for the benefit of their communities. The Eryri National Park is one of the signatory organisations, and although the policies of the Local Development Plan express the principles of the charter, it will also be necessary to ensure that this is the case when reviewing this chapter, mainly for this principle of identity.

Building Better Places The Planning System Delivering Resilient and Brighter Futures (July 2020)

- 5.14 This document sets out the Welsh Government's planning policy priorities to assist in taking action in the recovery period after the Covid-19 pandemic crisis. The document highlights the policy priorities and actions which should be used in the environmental, social, cultural and economic recovery of Wales.
- 5.15 The pandemic crisis has highlighted the need for good quality places for people to live, work and relax in. We have also seen the importance of local services and infrastructure with people spending more time locally. The following policy priorities for post pandemic recovery will need to be taken into account when revising the Eryri LDP:
- Staying local: creating neighbourhoods
 - Active travel: exercise and rediscovered transport methods
 - Revitalising our town centres
 - Digital places – the lockdown lifeline
 - Changing working practices: our future need for employment land
 - Reawakening Wales' tourism and cultural sectors
 - Green infrastructure, health and well-being and ecological resilience
 - Improving air quality and soundscapes for better health and well-being
- 5.16 The document also notes that economic forecasts and surveys, will need to be re-examined to ensure that the supply of land for employment uses is adequate and fit for the future, taking into account the need for a choice of sites. This will form part of the assessment that will be undertaken in the near future between the National Park, Gwynedd Council and Anglesey Council. Regarding strategic employment sites, 'Building Back Better Places' notes that local planning authorities should continue to assess if these are still needed or how needs may change, and work collaboratively across a region to designate land if there is a realistic prospect of it being developed in the medium term. With the rise of home-working, the review will also need to consider retail and town centres as flexible workplaces for remote workers to congregate together for the sharing of ideas and access to office environments and facilities.
- 5.17 'Building back better places' also notes that whilst there is undoubtedly a need for economic recovery, which the planning system should facilitate, this should not be at the expense of quality, both in terms of health and well-being and in response to the climate and nature emergencies. This is also consistent with the Sandford Principle, which is key to the workings of the National Parks.

Prosperity for All: A Low Carbon Wales Delivery Plan – Welsh Government (2019)

- 5.18 Prosperity for All: A Low Carbon Wales Delivery Plan 2019, is a document that outlines the foundations for Wales to transition to a low carbon nation. The plan begins the process of putting in place the systems and policies required to achieve long term targets across key areas such as agriculture, land use, transport, energy, the public sector, industry and business, waste and homes. By 2050, it is Welsh Government's aim to have reduced emissions by at least 80% (against a 1990 baseline).

Net Zero Wales – Welsh Government (2021, updated December 2022)

5.19 This is Welsh Governments second emissions reduction plan (titled Carbon Budget 2 (2021 to 2025)), and WG notes that it sets the foundation to make Wales net zero by 2050. The document and strategy is a follow up to 'Prosperity for all: A Low Carbon Wales', which covered the first carbon budget (2016-2020).

5.20 Under the Environment Wales Act, Welsh Ministers must prepare and publish a report for each budgetary period setting out their policies and proposals for meeting the carbon budget for that period. The Net Zero Wales plan sets out how WG aims to meet the second carbon budget (2021-2025) and reduce a wide array of emissions. Consumption emissions are a combination of those emissions that occur in Welsh households (heating and driving, for example); emissions that occur in Wales to produce goods and services consumed in Wales; and 'imported' emissions that occur in other countries to produce goods and services consumed in Wales. Welsh Government's statutory emissions targets and carbon budgets measure territorial emissions, taking the emissions that occur within Wales' boundaries into consideration. It is also important to measure Wales' consumption emissions, as action to reduce emissions in Wales could potentially lead to increased emissions in other parts of the world. WG use these two ways of accounting for Wales' emissions as national indicators in making progress towards the seven well-being goals. The targets and budgets set in law follow the Climate Change Committee's recommendations.

- Carbon Budget 2 (2021-2025): 37% average reduction (with 0% offset limit)
- Carbon Budget 3 (2026-2030): 58% average reduction
- 2030: 63% reduction
- 2040: 89% reduction
- 2050: at least 100% reduction (net zero)

5.21 The strategy contains 123 policies and proposals, and Welsh Government note that as we move through the early 2020's further policies will be developed and action across Wales will continue to apply downward pressure on emissions.

Beyond Recycling – Welsh Government (2021)

5.22 This document sets out Welsh Government's strategy for a circular economy; which means an aim to keep resources in use for as long as possible and avoid waste. The document aims for Wales to become zero waste by 2050 and it prioritises eight ambitious headline actions which are;

- Support businesses in Wales to reduce their carbon footprint by becoming more resource efficient
- Provide tools to enable community action. This means engaging with schools and communities working with citizens to support local initiatives and resource efficient actions
- Phase out unnecessary single-use items, especially plastic. Zero plastic will be sent to landfill, and will also progressively reduce the amount sent to energy recovery. Examples of schemes designed to achieve this will include an Extended Producer Responsibility Scheme for packaging; a Deposit Return Scheme for drinks containers and by applying bans or restrictions on unnecessary single-use items

- Eradicate avoidable food waste – by working with businesses across the whole supply chain, from farm to fork, to minimise waste, maximise resource efficiency and working to limit food waste in all settings
- Procuring on a basis which prioritises goods and products which are made from remanufactured, refurbished and recycled materials or come from low carbon and sustainable materials like wood
- Striving to achieve the highest rates of recycling in the world. A key step will be to transform the recycling of commercial, industrial, construction and demolition waste
- Reduce the environmental impact of the waste collection from our homes and businesses. WG will introduce ultra-low emission vehicles and invest in the infrastructure to power them with renewable energy, thereby reducing emissions and improving air quality. WG will improve how materials are collected and processed, including by embracing digital and smart technologies
- Take full responsibility for our waste. WG will reduce the amount of waste that we produce and effectively manage what we create by having the infrastructure we need. WG will also ensure we do not export problem waste elsewhere. WG will work with international partners to help them to tackle their waste issues and reduce the adverse impact of our consumption on other countries as well as learn from practice elsewhere

Water Quality in Riverine Special Areas of Conservation (SACs) (December 2020, January 2021)

- 5.23 In 2016 higher phosphorous standards and targets were set by the Joint Nature Conservation Committee. In 2021 NRW published evidence which showed that over 60% of riverine special areas of conservation (SAC) waterbodies in Wales, failed against the revised phosphorous standards. In May 2021, NRW issued updated advice to planning authorities for planning applications affecting phosphorous sensitive river SACs, which includes advice for the review of LDPs. It provides advice in terms of screening proposed LDP policies, including those relating to private sewage treatment systems, and the assessment of allocations proposed to be connected to mains wastewater treatment works. This matter will be a significant consideration in the preparation of the Replacement LDP and associated assessment processes
- 5.24 In terms of Snowdonia National Park, an assessment was undertaken during January 2022 to try and understand the potential planning and development impact of NRW's phosphate planning advice for Snowdonia's river SAC catchments. In terms of the river SAC catchments affected within the National Park, they include; Gwyrfai, Glaslyn, Dee and the Eden. Of these, parts of the Dee SAC fails to reach these new standards.
- 5.25 In terms of settlements affected by the new phosphate standards, within the current Eryri Local Development Plan, it is estimated that 4 allocated sites (of which are housing) are affected. This equates to around 28 open market units and 50 affordable housing units.
- 5.26 As part of their LDP process, Wrexham County Borough Council produced "The Dee Catchment Phosphorous Reduction Strategy" (alongside Flintshire County Council) in November 2021. It was credited by the Planning Inspector as being the first of its kind in Wales, and it was created due to the fact that a compliance test by NRW found that the River Dee and Llyn Tegid SAC failed to meet the new standards and thresholds.

5.27 The implications for Snowdonia National Park, and the review process are discussed further in the LDP topic area review chapter.

Wales National Marine Plan – Welsh Government (2019)

5.28 The Wales Marine Plan was published during November 2019, and it is the first marine plan for Wales and represents the start of a process of shaping our seas to support economic, social, cultural, and environmental objectives. Marine planning will guide the sustainable development of the marine area by setting out how proposals will be considered by decision makers.

5.29 The document is a marine plan for the inshore and offshore Welsh marine plan regions. The plan and supporting material should be used by applicants to shape proposals and licence applications, public authorities to guide decision making and other users to understand Welsh Government's policy for the sustainable development of the Marine Plan area. It is a 20 year plan and will be reviewed every three years.

The National Strategy for Flood and Coastal Erosion Risk Management in Wales – Welsh Government (2020)

5.30 This document was published in October 2020, and it is the second National Strategy on Flood and Coastal Erosion Risk Management (FCERM) for Wales, replacing the 2011 strategy. It is prepared under the terms of the Flood and Water Management Act 2010.

5.31 The strategy sets out how Welsh Government intends to manage the risks from flooding and coastal erosion across Wales. It sets objectives and measures for all partners to work towards over the life of the document (which will be 10 years unless significant policy updates are required prior to that time).

5.32 Whilst measures are designed to be clear and deliverable over the next decade, the strategy has been drafted with a longer term, strategic view, recognising the nature of flood and coastal erosion risk with respect to the challenges of climate change. In this way it will work alongside other strategic plans for shoreline management, infrastructure and planning to set out the direction Welsh Government want to take.

5.33 A specific reference within the document, which indirectly may affect the National Park, is a section about Fairbourne, Gwynedd. The village sits just outside the National Park boundary. Welsh Government note that Fairbourne sits on a low-lying sandbar behind coastal and estuarine defences which will become increasingly difficult to manage. The defences have been earmarked for managed realignment in the Shoreline Management Plan as this is considered to be the most sustainable solution to keep residents safe in the long term. In Wales, 95 coastal areas will move from a 'holding the line' policy (defending) to 'no active intervention' or 'managed realignment' by 2100. Around 40 of those areas may require relocation of property. A policy of managed realignment does not mean the complete withdrawal of support. The Welsh Government continue to provide funding for defences, maintenance and adaptation studies in Fairbourne. Since 2013, £8 million has been invested to keep its residents safe, plan ahead and adapt. It is possible that this may mean some relocation of residents/households in the future.

Essential Guide: Sustainable Management of Natural Resources and our Well-Being – Welsh Government (2019)

- 5.34 This Essential Guide focuses on the role of public service delivery in ensuring sustainable management of natural resources. Welsh Government note that Wales' natural resources and ecosystems underpin our well-being and quality of life and that they fuel our industries, provide our food, clean air and water and create jobs and wealth. Evidence shows that our natural resources, and the benefits that our ecosystems provide, are in decline. Stresses such as pollution, habitat fragmentation, climate change and over-exploitation are placing even greater pressure on them.
- 5.35 Building resilience into our natural resources and ecosystems, so that these benefits are available now – and for our future generations – is vital. In managing natural resources wisely WG notes that we can provide solutions across all four pillars of sustainable development to support our economic, social, environmental and cultural well-being. This is the 'sustainable management of natural resources'.
- 5.36 The Essential Guide takes key elements from the Well-being of Future Generations Act; Environmental (Wales) Act; and the Planning Act and shows how these contribute to ensure Wales develops sustainably. This Essentials Guide sets out for public service delivery:
- What the sustainable management of natural resources is, and why it is important.
 - How the Well-being of Future Generations Act and the sustainable management of natural resources work together to improve well-being.
 - The action that can be taken.
- 5.37 It is noted that public service delivery can contribute towards this by taking action on the sustainable management of natural resources; taking action on the national priorities in the Natural Resource Policy; and by taking action on the section 6 Biodiversity and Ecosystem Resilience Duty. The section 6 duty aims to ensure that the consideration of biodiversity becomes an integral part of the decision making and actions that public authorities take in relation to Wales. Public authorities can take action to reverse the decline in biodiversity by thinking about biodiversity in decision making and how they carry out their functions. The section 6 plan, required under the Act, can be a key means of demonstrating and reporting on the steps being taken by a public body or public service board to meet well-being objectives and plans. Natural Resources Wales' State of Natural Resources Report and Area Statements provide national and local evidence bases on biodiversity and ecosystem resilience, for public authorities to draw from when discharging the section 6 duty.

The Second State of Natural Resources Report (SoNaRR2020) – Natural Resources Wales (2020)

- 5.38 This document is the second State of Natural Resources Report (SoNaRR) required under the Welsh Environment Act 2016. Since the first report in 2016, the first natural resources policy has been published, as have the Area Statements. Additionally the world has begun to recognise the nature and climate emergencies facing us all, and the Covid-19 pandemic has brought a new focus on well-being. This second report is written with that context in mind.

- 5.39 SoNaRR2020 builds on a number of Welsh, UK and global assessments of the status and trends of natural resources. It looks at the risks those trends pose to our ecosystems and to the long-term social, cultural and economic well-being of Wales, in terms defined by the Well-Being of Future Generations (Wales) Act 2015.
- 5.40 The purpose and content of the SoNaRR is to provide;
- An assessment of the state of natural resources in Wales.
 - An assessment of the extent to which the sustainable management of natural resources is being achieved.
 - An assessment of biodiversity to support the biodiversity duty on public bodies under section 6 of the Environment Act. Biodiversity is defined as: ‘the diversity of living organisms, whether at the genetic, species or ecosystem level’.
 - What NRW considers to be the main trends and factors that are affecting and are likely to affect the state of natural resources.
 - Any aspects about the state of natural resources on which NRW considers it does not have sufficient information to make an assessment
- 5.41 The document links with other key strategies and reports throughout, with cross-cutting themes including;
- Biodiversity
 - Climate Change
 - Land use and soils
 - Invasive non-native species
 - Air quality
 - Water efficiency
 - Waste
 - Energy efficiency
- 5.42 The report has 4 aims for Wales which include that Stocks of natural resources are safeguarded and enhanced; Ecosystems are resilient to expected and unforeseen change; Wales has healthy places for people, protected from environmental risks; and a regenerative economy. Against these four aims, pressures are identified as well as opportunities for actions to achieve the aims.

Securing Biodiversity Improvements – Welsh Government Letter (2019)

- 5.43 This was a letter sent out to Heads of Planning in Wales during October 2019. The letter quoted an extract from Planning Policy Wales (PPW10) which noted;

“planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity” (para 6.4.5 refers).”

- 5.44 The purpose of the letter was to clarify that, in light of the legislation and Welsh Government policy outlined above, where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence and unless other significant material considerations indicate otherwise it will be necessary to refuse permission.

- 5.45 The letter emphasised that it is important that biodiversity and ecosystem resilience considerations are taken into account at an early stage in development plan preparation and when proposing or considering development proposals. Planning authorities should be proactive and embed appropriate policies into local development plans to protect against biodiversity loss and secure enhancement. The attributes of ecosystem resilience (PPW para 6.4.9 refers) should be used to assess the current resilience of a site, and this must be maintained and enhanced post development. If this cannot be achieved, permission for the development should be refused.
- 5.46 Securing a net benefit for biodiversity within the context of PPW requires a pragmatic response to the specific circumstances of the site. Working through the step wise approach (PPW para 6.4.21 refers), if biodiversity loss cannot be completely avoided (i.e. maintained), and has been minimised, it is useful to think of net benefit as a concept to both compensate for loss and look for and secure enhancement opportunities. A net benefit for biodiversity can be secured through habitat creation and/or long term management arrangements to enhance existing habitats, to improve biodiversity and the resilience of ecosystems. Securing a net benefit for biodiversity is not necessarily onerous; through understanding local context, it is possible to identify new opportunities to enhance biodiversity.

COP15, Biodiversity Deep Dive, Section 6 Duty and the Planning System – Welsh Government Letter (December 2022)

- 5.47 This was a letter sent out to Heads of Planning in Wales during December 2022. The letter noted that at the United Nations COP15 Biodiversity Summit, leaders from around the world had agreed to a new Global Biodiversity Framework to put the world on a path to restoring nature by the end of the decade. Welsh Government representatives attended the COP15 event and emphasised the key roles that subnational governments, cities and local authorities play in protecting and enhancing biodiversity and in delivering actions across planning, implementation and monitoring.
- 5.48 WG recently completed a Biodiversity Deep Dive, which has eight key objectives. These include;
- Transform the protected sites series so that it is better, bigger, and more effectively connected
 - Create a framework to recognise Nature Recovery Exemplar Areas and Other Effective Area-based Conservation Measures (OECMs) that deliver biodiversity outcomes
 - Unlock the potential of designated landscapes (National Parks and Areas of Outstanding Natural Beauty) to deliver more for nature and 30 by 30
 - Continue to reform land and marine management and planning (including spatial) to deliver more for both protected sites and wider land / seascapes
 - Build a strong foundation for future delivery through capacity building, behaviour change, awareness raising and skills development
 - Unlock public and private finance to deliver for nature at far greater scale and pace
 - Develop and adapt monitoring and evidence frameworks to measure progress towards the 30x30 target and guide prioritisation of action
 - Embed Nature Recovery in policy and strategy in public bodies in Wales

5.49 Objective 3 (Unlock the potential of designated landscapes (National Parks and Areas of Outstanding Natural Beauty) to deliver more for nature and 30 by 30) has some key goals included within the objective. These include;

- Supporting the National Parks and AONBs to develop a prioritised action plan for nature restoration embedding these in strategic planning
- Realign Designated Landscapes priorities to enhance and accelerate nature recovery delivery, supported by updated policy, resources and guidance to build capacity and expertise and to target activity.
- Develop the evidence and mapping tools to enable designated landscapes to baseline, target and monitor areas of high nature value that could be secured as their contribution to 30 by 30
- Ensure Designated Landscapes bodies are funded adequately, sustainably and flexibly to deliver nature recovery at a transformational landscape scale.
- Ensure that the potential designation of a new National Park in northeast Wales affords opportunities for climate change mitigation and nature recovery as key delivery priorities for the new Park.
- Consider the need for legislation in the next Senedd to reform the statutory purposes, duties and governance arrangements for designated landscape bodies to equip them better to drive nature's recovery.

5.50 The purpose of the Welsh Government letter was to highlight the essential role that the planning system must play in meeting the challenges laid down by COP15 and by the Deep Dive recommendations and in fulfilling Section 6 duty in Wales. Additionally the letter gives notice of proposed changes to planning policy in relation to net benefit for biodiversity and the protection afforded to Sites of Special Scientific Interest and trees and woodlands.

5.51 The WG Deep Dive committed delivery of the 30 by 30 target, to protect, effectively and equitably manage 30% of Wales' land, freshwater and seas by 2030 as a strategic focus to consider where and how action could be accelerated. Planning Policy Wales (PPW) includes the planning system response to the Section 6 Duty by setting out a framework for planning authorities to maintain and enhance biodiversity in the exercise of their functions (providing a net benefit for biodiversity).

5.52 A net benefit for biodiversity, whilst similar in concept to Net Gain, includes a distinct reference to ecosystem resilience and how the site relates to surrounding ecosystems and biodiversity. As such it encourages proposals to pro-actively maintain and enhance biodiversity and ecosystems with a focus on avoidance, minimisation and mitigation of impacts within the context of the site with offsite mitigation seen as a last resort in considering the resilience of ecosystems, their diversity, extent, condition, connectivity and adaptability. PPW and Future Wales both make key references and commitments towards these objectives and goals.

5.53 The letter concludes by noting that in fulfilling duties in relation to biodiversity planning authorities should have regard to the Welsh Government's Approach to Net Benefits and the DECCA Framework in the Terrestrial Planning System, a joint CIEEM (Chartered Institute of Ecology and Environmental Management) and Welsh Government briefing note which provides further supporting information on delivering net benefits for biodiversity and the resilience of ecosystems and key considerations for ecologists and developers in submitting planning proposals.

Technical Guidance, 'How to Improve Energy Efficiency in Historic Buildings in Wales' Cadw (April 2022)

5.54 It has been identified that two of the major challenges facing the Historic Environment today are the Climate Change Agenda and the lack of understanding the function and significance of the designated and non-designated historic assets. Technical guidance by Cadw on 'How to Improve Energy Efficiency in Historic Buildings in Wales' (April 2022) has been published and may be referenced during the review process, as well as work carried out by the Eryri NPA regarding the designated Conservation Areas discussed as part of the Local Context.

'Local Listing of Historic Buildings' letter Welsh Government September 2022

5.55 On 28th September 2022, the Deputy Minister for Arts and Sport, issued a letter regarding the 'Local Listing of Historic Buildings'. Within this letter, the Deputy Minister expressed concern regarding the loss of the historic buildings which do not meet the national threshold, but which are significant locally, stating

'We cannot continue to lose these buildings through permitted development rights without any proper democratic scrutiny. Retaining, and possibly adapting, such buildings can add to the value and quality of the places within which we live and avoid what can sometimes be perceived as inferior and unimaginative modern development. These buildings tell the story of Wales, and the evolution of our way of life, and highlighting them for special consideration can also contribute to our Climate Change Strategy. We have a particular responsibility to future generations to ensure that owners do not destroy, without proper scrutiny, a legacy of historic buildings that illustrate important aspect of our past lives... Therefore, I strongly encourage each authority in Wales to take up the option of 'local listing' so that we can rely on local democracy as the mechanism to decide what happens to these buildings in the future. It is also important that such lists are kept up to date and that we make use of the statutory provisions, like Article 4 Directions, to regulate the indiscriminate demolition of such buildings.'

5.56 The Authority will need to revisit and review the local list of traditional buildings and ensure active steps are taken to protect historic and traditional buildings that are outside the national protection threshold, recognising how important these buildings are, as well as how it might contribute to the climate change strategy. The Authority's powers and resources should be considered and exercised to ensure greater protecting and enhancement for these buildings for the future.

Revocation of Technical Advice Note (TAN) 1 Joint Housing Land Availability Studies (March 2020) and Monitoring of Delivery through a Housing Trajectory

5.57 Technical Advice Note (TAN) 1 has been revoked in its entirety as a result of the policy change to PPW which now outlines that Local Planning Authorities are expected to use their housing trajectory as the basis for monitoring the process of delivering their housing requirement. The trajectory is published within the Annual Monitoring Review each year.

Second homes / self-catering holiday accommodation: Regulatory changes, Welsh Government (October 2022); Ministers Letter to LPA's (September 2022).

- 5.58 The levels of second home ownership and increase in short-term self-catering accommodation has been a highly prominent issue since the first lockdown period ended. The impacts of the pandemic and Brexit have accelerated existing trends. The increase in second homes and short-term self-catering accommodation is associated with economic, environmental, and cultural impacts on the sustainability of communities and is a great concern to the communities of Snowdonia. Until the 20th of October 2022, the change of use of an existing dwelling to a second home or holiday let was not considered as development under the Planning Act, therefore their change of use was outside the scope of the Planning system, and the ELDP 2016-2031 does not contain relevant policies.
- 5.59 The Welsh Government announced a package of measures in July 2022 to tackle the issue of second homes and short-term self-catering accommodation in Wales. These included a land use planning element which potentially affects the National Park Authority. This comprises a legislative change which enables a Local Planning Authority to try and control second homes and short-term self-catering accommodation in its area. It follows a consultation on the issue in November 2021, to which the National Park Authority supported the principle but also flagged up some issues relating to practicality and resource burden.
- 5.60 As of October 20th, 2022, the *Town and Country Planning (Use Classes) Order 1987* (UCO) was amended to create new use classes for
- ‘Dwellinghouses, used as a main or sole residence’ (Class C3),
- ‘Dwellinghouses, used otherwise as a sole or main residence’ (Class C4), and:
- Short-term lets ‘Class C6’.
- 5.61 Previously there was no distinction between these uses within the Use Class Order – and they would all have been considered under a single Class C3.
- 5.62 *The Town and Country Planning (General Permitted Development) Order 1995* has also been amended to allow changes between the above 3 uses. It is Permitted Development (i.e. no planning application required) to change between the 3 new uses – C3, C5 and C6. Critically, these ‘permitted development’ rights can be dis-applied within a specific area by what is termed an Article 4 Direction by a Local Planning Authority on the basis of robust local evidence.
- 5.63 As set out in the **Ministers letter to LPA's dated the 28th of September 2022** the complementary changes have also been made to section 4.2 of Planning Policy Wales (PPW). These policy changes make it explicit that, where relevant, the prevalence of second homes and short-term lets in a local area must be taken into account when considering housing requirements and policy approaches in Local Development Plans (LDPs). The amendments to PPW make it clear that where a local planning authority introduces an Article 4 Direction, it should reinforce its actions by requiring conditions to be placed on all new dwellings restricting their use to Class C3 where such a condition would meet the relevant tests. Local authorities should also allocate sites in LDPs restricted to C3 use, including local market housing, in areas where they are seeking to manage second homes and short-term lets.

Welsh Language Communities Plan (August 2022)

- 5.64 The Government are soon to announce details of a Welsh Language Communities Housing Plan which offers support to Welsh speaking communities with a high concentration of second homes. The plan will also include support for social enterprises and community housing co-operatives, as well as steps to protect Welsh place names.
- 5.65 The Government launched a Commission for Welsh-speaking Communities, chaired by Dr Simon Brooks, in August 2022. The Commission will examine the linguistic reality of Welsh-speaking communities today in order to make policy recommendations which will help safeguard them for future generations. The Commission has called for evidence about how Welsh speaking communities can be strengthened, to which ENPA will submit a representation. The Commission will produce a comprehensive report, bridging policy areas from education to the economy.

Llwybr Newydd – Wales Transport Strategy (March 2021)

- 5.66 **The** Wales Transport Strategy 2021 is the Welsh Government's guidance that aims to shape the transport system in Wales over the next 20 years. It places people and climate change at the front and centre of our transport system. The vision is to:

- Bring services to people in order to reduce the need to travel
- Allow people and goods to move easily from door to door by accessible, sustainable transport
- Encourage people to make the change to more sustainable transport

- 5.67 Its well being ambitions are to be good for people and communities, the environment, places and the economy, culture and the Welsh Language. The strategy influenced the Welsh Government's backing of the Llanbedr bypass scheme to be withdrawn.

Active Travel

- 5.68 The Active Travel (Wales) Act 2013 seeks to bring about a substantial increase in active travel and forms a key driver in the delivery of the Welsh Government's ambition to create sustainable places where people can walk and cycle as part of their everyday activity. Since the Act was made, local authorities have developed plans for active travel networks for their area. The Active Travel Network Maps are a tool for local authorities to enhance their forward planning of active travel and should be used to inform, as well as be informed by, the location and design of new development.

Regional Policy

North West Wales Area Statement – NRW (2020)

- 5.69 Area Statements produced by NRW cover seven separate parts of Wales, with the north west Wales Area Statement being relevant to Snowdonia National Park. Their purpose are to outline the key challenges that face the locality; what can be done to meet those challenges and how we can better manage natural resources for the benefit of future generations.
- 5.70 The Area Statements are updated regularly and improved upon year on year as more data and information is gathered. The key themes for the north west Wales area included 'Ways of Working'; 'Climate and nature emergency'; 'Reconnecting people with nature'; 'Encouraging a sustainable economy'; 'Supporting sustainable land management'; 'Opportunities for resilient ecosystems'.
- 5.71 It has been noted that many ecosystems within our natural environment are in decline, and there is a need to find more sustainable ways to manage, protect and enhance these natural assets.

Live Healthy, Stay Well Strategy

The Health Board's 10-year strategy was updated in 2021 to help people manage their health and wellbeing. The Strategy contained the following goals for health and well being:

- Improve physical, emotional and mental health and well-being for all
- target our resources to people who have the greatest needs and reduce inequalities
- Support children to have the best start in life
- work in partnership to support people – individuals, families, carers, communities – to achieve their own well-being
- Improve the safety and quality of all services
- Respect people and their dignity
- Listen to people and learn from their experiences

The Slate Landscape of Northwest Wales World Heritage Site

- 5.72 Since July 2021, the previously designated Candidate World Heritage Site, The Slate Landscape of Northwest Wales, has been designated as a World Heritage Site. It will therefore be necessary to amend this within the revised Plan. With the Slate Landscape of Northwest Wales designated within the Local Planning Authority Area of Gwynedd Council and the Eryri National Park, a joint SPG has been prepared and adopted by both Authorities (June 2022). Any change to policy will therefore require consultation with Gwynedd Council to ensure coherence.

SDP Housing Targets

5.73 Should an SDP be adopted for the North Region, it will include housing targets for the region. These may need to be taken into account, dependant on the timing of its adoption. ENPA will have input into the SPD.

North Wales Growth Deal. North Wales Economic Ambition Board (2019)

5.74 In 2019, representatives from the North Wales Economic Ambition Board, Welsh Government and UK Government came together to agree and sign the North Wales Growth Deal. The deal is estimated to be worth more than £1bn to north Wales, and will aim to have a positive impact on thousands of households, businesses and organisations across the area. The programmes within the deal include projects on:

- Low carbon energy
- Advanced manufacturing
- Land based industries (agriculture and tourism)
- Land and property
- Skills and employment
- Digital connectivity
- Strategic transport

5.75 The objectives of the deal, according to Ambition North Wales, will be to create around 4,200 new jobs and provide £2.4bn additional GVA. In terms of the National Park, a project linked to the deal is the ambition to bring an SMR development to Trawsfynydd, and Ambition North Wales are working with the lead sponsor, Cwmni Eginio, to develop the site

Strategic Flood Consequences Assessment (SCFA) – as part of Welsh Government’s revised TAN15

5.76 A revised TAN 15 was due to be published during 2022, but has since been delayed until mid-2023. The revised TAN will contain stricter guidance for development, which includes brownfield land only development in areas of risk and higher thresholds for flood defences

5.77 Part of the reason for the delay is so that Local Planning Authorities (LPAs) can adequately plan for the new flood risk areas, especially when forming Local Development Plans or undergoing review processes.

5.78 During December 2021, Welsh Government wrote to all Local Authorities in Wales, requesting that their SFCA’s be updated in order to reflect the Flood Mapping for Planning (FMfP) which is part of the new TAN15. The new FMfP (in contrast to the previous TAN’s Development Advice Maps), takes into account the risks of climate change within the flood risk maps.

5.79 In response to this, Gwynedd Council, Anglesey Council and Snowdonia National Park have appointed Ymgynghoriaeth Gwynedd Consultancy (YGC) to update the

assessments of sites, and allocated sites, within the Local Development Plans. These sites vary from residential sites and allocations; employment and industrial sites and the designated enterprise zones. It is estimated that this work will be completed during early 2023.

Gwynedd and Eryri Sustainable Visitor Economy 2035: Strategic Plan

5.80 Work is underway regarding the Strategic Plan for Gwynedd and Eryri's Sustainable Visitor Economy, to be adopted in Spring 2023. This strategic plan sets out the vision for the future of 'A visitor economy for the benefit and wellbeing of the people, environment, language and culture of Gwynedd and Eryri.' The strategic plan also sets forth three core principles for a sustainable visitor economy,

- Celebrate, Respect and Protect our Communities, Language, Culture and Heritage
- Maintain and Respect our Environment
- Ensure that the advantages to Gwynedd and Eryri communities outweigh any disadvantages

5.81 The objective of this strategic plan is for this new collaboration between Gwynedd Council, the Eryri National Park, and community, business and public partners to lead to a sustainable visitor economy in the area which gives priority to the wellbeing and prosperity of the communities, language and culture. This will therefore need to be considered when reviewing the plan.

5.82 The Plan recognises the over-reliance of reporting on economic and employment element of tourism and the need to consider the impact of the visiting economy sector more holistically. The Plan therefore identifies new indicators for measuring the impact of the visiting economy on the area so that there will be a much more balanced picture which represent the three core principles headings referred to above.

North Wales Metro

5.83 Policy 12 of Future Wales (2021) includes the development of the North Wales Metro. The aim is to create new integrated transport systems that provide faster, more frequent, and joined-up services using trains, buses and light rail. This Metro is focused on the A55 corridor and wider area, which extends into the northern area of the National Park. North Wales Metro could play a significant role in encouraging car-free access to Snowdonia.

Dark Skies

5.84 Since 2019, the Park has entered into a partnership with the three AONB's of Ynys Môn, Clwydian Range and Dee Valley, and Pen Llŷn to help protect night skies over a larger area of North Wales, impacting positively on wildlife, habitat, residents and tourists on a much larger scale. The project, known as 'Prosiect Nôs' is working across north Wales to educate and support communities to protect their dark skies and all the benefits they bring. Since 2019 they have engaged with nearly 10,000 people at wide ranging events in the area.

5.85 As part of the 'Prosiect Nôs', a guidance document was prepared which was called 'Good lighting – Business and community guidance'. The document was prepared for

the Clwydian Range and Dee Valley AONB by Light 4 Cundall, supported by a working group of officers from the AONB and Prosiect Nôs North Wales Dark Sky Partnership (which includes Snowdonia National Park officers). The document seeks to provide information to businesses, organisations, communities and individuals about how they can create an environment that supports dark skies, and to become dark sky friendly. It is possible that this guidance could be adopted as an SPG for the National Park

- 5.86 In 2021, the National Park finished a project with Plas y Brenin, the National Outdoor Centre in Capel Curig, who welcomed the dark skies project to work on improving their lighting. The site is now an excellent demonstration of how dark sky lighting should be done. It is better for the health of local residents, people visiting the centre and for the nocturnal habitat for a multitude of wildlife. The centre has also saved nearly two tons of carbon a year by changing its light and will see thousands in energy savings over time.

Local Policy

Cynllun Eryri 2020

- 5.87 Cynllun Eryri, the National Park Management Plan adopted in 2020 is the overarching strategic document for the National Park, co-ordinating and integrating other plans, strategies and actions. It indicates how National Park purposes and the associated duty will be delivered through sustainable development. Cynllun Eryri is not just a plan for the National Park Authority; it is for all those people and organisations that have influence over the future of the National Park. Cynllun Eryri sits alongside the Eryri Local Development Plan (LDP). The plans have a shared vision and the LDP seeks to deliver the spatial elements of Cynllun Eryri.

- 5.88 Cynllun Eryri contains a series of outcomes.

Environmental outcomes:

- A1. Sustainable Tourism principles are achieved.
- A2. Biodiversity is being maintained and enhanced, whilst the resilience of ecosystems is increased.
- A3. We are prepared for the impacts of climate change and are reducing our carbon footprint.
- A4. Eryri is at the forefront internationally in successfully tackling invasive species, pests and diseases that impact on native species.
- A5. Communities, businesses and visitors play an active role in caring for the National Park's landscapes, habitats, wildlife and cultural heritage.
- A6. Eryri is a leading example in Wales of how to care for and champion cultural heritage and the historic environment.
- A7. Our Special Qualities are well protected.

Health and Wellbeing outcomes:

- B1. The National Park is having a positive impact on well-being.
- B2. Residents and visitors can access a variety of routes in the National Park aimed to improve physical and mental health.
- B3. Our Special Qualities are widely recognised and understood.
- B4. Sustainable options for transport and parking are achieved.

B5. Our visitor facilities are high quality and landscape sensitive.

Community and Economy outcomes:

C1. The language, culture and heritage of Eryri is being celebrated, supported and strengthened.

C2. Jobs and opportunities encourage people to remain in the area.

C3. Innovative solutions relating to affordable housing to buy and rent in the area are being implemented

C4. Local communities are supported to thrive in all aspects of well-being

5.89 It is anticipated that Cynllun Eryri's policies and actions will also be revised in the next few years in parallel with the Eryri LDP to ensure coherence between the Authority's two strategic documents.

Well Being Plans

5.90 The Well-being of Future Generations (Wales) Act 2015 requires Councils, as representatives of the Public Services Board, to prepare a Well-being Plan. LPAs have a duty to have regard to the local Well-being Plan during development plan preparation and review, and it will form a key part of the LDP's evidence base for the Replacement LDP.

Gwynedd & Anglesey Well Being Plan 2018

5.91 Cyngor Gwynedd and Cyngor Ynys Mon jointly published their Well-being Plan in 2018. The Well-being Plan provides a long-term vision of well-being in Gwynedd and details the actions that will be taken to address local issues and contribute to the national well-being goals. The plan sets out 2 well-being objectives of

- 1) thriving and long-term prosperous communities, and;
- 2) Healthy and independent residents with a good standard of life.

5.92 The current well-being plan period is coming to an end. In May 2022, an Assessment of Local Well-being was published for Anglesey and Gwynedd. The Assessment is used to set the local well-being objectives, and these will provide a framework for the next Well-being Plan.

The Conwy and Denbighshire Local Well-being Plan 2018-2023

5.93 The Conwy and Denbighshire Local Well-being Plan was approved in April 2018 and sets out the local objectives to improve the economic, social, cultural and environmental well-being for the area. The priorities are;

- People – Supporting Good Mental Well-being for all ages
- Community – Supporting Community Empowerment
- Place – Supporting Environmental Resilience.

The Cyngor Gwynedd Plan 2023 – 2028

The purpose of the Plan is to set out the Council's vision and priorities for the period between April 2023 and the end of March 2028. The Plan explains why we are focusing our energy and resources in certain areas. The Plan includes a series of projects for the next five years under seven priority fields:

- Tomorrow's Gwynedd: Giving our children and young people the best possible start in life
- A Prosperous Gwynedd: Strengthening the economy and supporting the people of Gwynedd to earn a decent salary
- A Homely Gwynedd: Supporting the people of Gwynedd to live in suitable and affordable homes in their communities
- A Caring Gwynedd: Supporting the residents of Gwynedd to live full and safe lives in our communities
- A Welsh Gwynedd: Ensuring that we give our residents every possible opportunity to use the Welsh language in the community
- A Green Gwynedd: Protecting the county's natural beauty, and responding positively to the climate change crisis
- An Efficient Gwynedd: Putting the residents of Gwynedd first and treating them fairly and ensuring that the Council performs effectively and efficiently

Gwynedd Council's Regeneration Plan: Ardal Ni 2035

5.94 Gwynedd Council is in the process of preparing a new Regeneration Plan: Ardal Ni 2035 and have called on the county's residents - from the Llŷn Peninsula to Penllyn and from Aberdyfi to Abergwyngregyn - to complete the 'Ardal Ni 2035' (Our Area) questionnaire. It gives the opportunity for people in the county to say what's good about their local area, what's not so good and what needs to change to make their area a great place to live by 2035. All responses received will help shape the work of prioritising and developing 13 local regeneration plans for Gwynedd's communities over the next 15 years. The next step will then be to collaborate and jointly develop solutions with local organisations, groups and individuals.

'Climate and Nature Emergency Plan' Gwynedd Council March 2022,

5.95 'Climate and Nature Emergency Plan' lasting the period between 2022 and 2030 outline the steps that Gwynedd Council will take by 2030 to ensure the ambition of becoming a net zero council is met. The plan focuses on making changes to the topics listed below, in order to ensure that the net zero ambition is met;

- Buildings and energy
- Mobility and transport
- Waste

- Governance
- Procurement
- Land Use
- Ecology

Yr Wyddfa Partnership Plan

5.96 This plan has been developed by Yr Wyddfa Partnership, a close working and cohesive group of organisations working on and around Yr Wyddfa, who recognise the benefits of collaboration. This plan has been created to ensure a sustainable, positive future for Yr Wyddfa to give partnership work clarity and visibility. The five priority themes that the Partnership, have identified are: 1. Caring for Yr Wyddfa's Natural Environment 2. The Rural Economy and Local Communities 3. Infrastructure and Services 4. Visitor Information and Tourism 5. Outdoor Activities, Adventure and Education.

Conservation Areas fit for the Twenty-First Century', SNPA 2022

5.97 Since October 2021, the Authority has embarked on a project, titled 'Conservation Areas fit for the Twenty-First Century' to ensure the sustainable conservation of Eryri's Conservation Areas, which may also be applied to Eryri's traditional / historic as well as listed buildings. The first year of the project has included drafting individual conservation area appraisals for the 14 designated Conservation Areas, as the foundation for the positive management of these areas to ensure appropriate as well as sustainable development. Specifically, the Appraisals define what is important about the areas but also, through analysis, start to identify where issues, opportunities, and other factors lie. The subsequent individual Management Plans provide a framework to effectively manage the Conservation Areas, enhancing and protecting their special character in a positive and pro-active way, and providing those who live, work, invest in and manage the areas with effective guidance. As part of this work, the Authority has also produced the more specific guidance on improving the energy efficiency of traditional and listed buildings within Conservation Areas 'Advice on Energy Efficiency Measures in Conservation Areas – A Planning and Practical Guide'. Provisions regarding this project may therefore need to be considered during the revision of this chapter of the LDP.

Gwynedd Council Housing Strategy (2019)

5.98 Gwynedd Council's Housing Strategy was adopted in July 2019. The vision of the Housing Strategy is to:

"Ensure that the people of Gwynedd have access to a suitable, quality home, which is affordable and improves their quality of life."

5.99 The Strategy outlines five objectives that would need to be addressed if the Council is to achieve this vision:

1. No-one homeless in Gwynedd
2. Social housing available to all those who need one
3. Everyone's home in Gwynedd is affordable to them
4. Gwynedd Housing are environmentally friendly

5. Homes have a positive influence on the health and well-being of the people of Gwynedd

Gwynedd Council Housing Action Plan 2020/21 – 2026/27

5.100 The purpose of the Action Plan is to outline how the Council will seek to address the objectives of Gwynedd Council's Housing Strategy (2019) now and up to 2026/27.

5.101 Over 30 schemes are outlined across the county which will enable the Council to:

- facilitate over 500 new affordable homes for sale or letting to Gwynedd residents including the construction of 100 new houses;
- offering loans for 250 local first-time buyers;
- securing over 600 new social housing for Gwynedd including the purchase of 72 former social houses for rent to local people in line with the Council's new local lettings policy;
- extending a grant scheme to bring 250 empty homes back into use across the county;
- investing in environmentally friendly homes such as the innovative scheme currently in place in the Segontium area of Caernarfon;
- the development of 150 living units for homeless people in the county and the creation of 130 new units for vulnerable residents.

In order to deliver the plans, the Council will reinvest £22.9 million of Council tax premium on second homes until 2026/27, along with other sources of funding including social housing grants and the funding raised through the Council's Asset Management Plan.

Conwy County Borough Council's Housing Strategy 2018-2023

5.102 This sets out the vision and plans for housing in Conwy County for the next five years. Any new or updated strategy will have relevance to the LDP review.

5.103 The vision of the Housing Strategy is to:

" for people in Conwy to have access to affordable, appropriate and good quality accommodation that enhances their quality of life. We want to build more than just houses, we want to create sustainable communities where people are proud to call home."

5.104 The Strategy outlines four objectives that would need to be addressed if the Council is to achieve this vision:

1. Increase the supply of affordable housing options for those with lower incomes.
2. Work towards meeting the diverse accommodation and support needs of everyone in our county now and in the future.
3. Improve the condition and energy efficiency standards of our housing.
4. Ensure people understand their housing options to enable them to make an informed decision

Registered Social Landlords: Development Strategies

RSL's have a vital role in providing social and intermediate affordable housing, and their respective development strategies are also an important consideration.

Local Housing Market Assessments

- 5.105 Local Housing Authorities are responsible for producing and updating Local Housing Market Assessment (LHMA) in partnership with planning authorities and other stakeholders. Gwynedd Council have updated their LHMA for the period (2018-2023). Gwynedd LHMA (2018-2023) has identified an annual housing need figure of 707 for the Gwynedd area. Using a pro rata split of 19% for the part of Gwynedd area within the National Park boundary, gives an annual need of 134 and a total of 670 units over the 5 year LHMA period. Gwynedd Council have begun work on a new LHMA which will be published late 2023/early 2024.
- 5.106 Conwy have released an interim LHMA intended to update the last Local Housing Market Assessment published in 2018. It is an interim document pending the next Assessment which will follow new guidance developed by the Welsh Government. The LHMA identifies a total of 1,145 additional affordable homes over the period 2022-2027 (229 units per year) for the whole of Conwy County. On a pro rata split of 4% for the part of Conwy area within the National Park boundary this equates to a total of 46 units over the 5-year period, an annual need of 9 units for the area of Conwy which falls within the National Park. There is little change in these figures from the previous LHMA for 2018-23.
- 5.107 Gwynedd and Conwy will soon commence work to update their LHMA which will be an important part of the evidence base for future review of the Eryri LDP. The Welsh Government has introduced a new methodology for producing LHMA's. The new guidance² advises that where national park boundaries intersect local authority boundaries, practitioners may find it helpful to construct HMAs in a way that allows housing need data to be extracted for the National Park. It is suggested that National Parks utilise the estimates of additional housing need and demand set out within the local authority's LHMA to develop a concise analytical report. All local authorities will need to submit an LHMA to Welsh Government before the end of March 2024. Conwy aim to update their LHMA by March 2023; Gwynedd by March 2024.
- 5.108 The Authority will continue to work closely with Gwynedd and Conwy and use the findings of the LHMA's to help inform the type of dwellings required in terms of size and tenure mix. In addition, the Local Authorities of North Wales and housing associations have set up an intermediate housing register (Tai Teg) which is coordinated by Grŵp Cynefin housing association. This register provides specific information about intermediate housing needs across the whole of north Wales and it is possible to break down the information by settlement to provide an accurate figure of intermediate housing need within settlements across the National Park.
- 5.109 The Authority will continue to work with the Rural Housing Enabler service. The service produces housing need reports for communities, which is an important source of evidence for policy formulation and for developers to identify need.

Dwyfor Pilot

5.110 The Welsh Government has established a pilot in the Dwyfor area to trial and monitor new initiatives to address the second homes issue and affordability. Part of Dwyfor falls within the National Park (Beddgelert, Dolbenmaen), and Eryri NPA are involved as partners. The pilot will assist in gathering evidence that would be required for an Article 4 direction, which if adopted, will mean planning permission will be needed to change between the new use classes for dwellings. The partners involved in the pilot are also working on a number of initiatives to help deliver affordable housing within the area, including the potential of community housing schemes.

Supplementary Planning Guidance: Telecommunications and Masts – Eryri National Park Authority (2021)

5.111 A new SPG regarding telecommunications developments was adopted in 2021. This SPG seeks to provide detailed guidance about the manner in which the Planning Authority will deal with telecommunication and mast development and will provide support for case officers. The SPG also provides guidance to assist developers submitting planning and prior approval applications. The SPG was also completed in order to provide an answer to the increasing demand and applications for Telecommunications developments that the National Park has seen in recent years, mainly this monitoring period (and is likely to remain high for the next monitoring period). This is due to a campaign to improve the connectivity in rural areas within the UK which comes under the Shared Rural Network scheme. Throughout the UK (on behalf of EE, O2, Three and Vodafone) the project aims to provide coverage to an additional 280,000 premises and for an additional 16,000km of road. It is also aimed to improve geographic coverage within UK National Parks, from the current levels of 41%, to 74%. This ultimately results in applications being brought forward and submitted within Snowdonia National Park and the SPG will help provide guidance to ensure that the developments are in the best locations possible and to avoid any adverse effects on the landscape, whilst also securing economic and social need. This may also provide some implications for the plan review, and the review of the telecommunications policy, however the protection and emphasis on the environment will always remain the priority.

Yr Wyddfa and Ogwen Transport and Parking Review and Options Appraisal (2020) Martin Higgitt Associates: on behalf of Partneriaeth yr Wyddfa

5.112 During early 2020 Martin Higgitt Associates, appointed by Partneriaeth Yr Wyddfa, carried out an in-depth analysis of the various factors surrounding the parking and transport issues in the Yr Wyddfa and Ogwen areas of the National Park. The aim of the report was to develop a strategy for managing access and parking around Yr Wyddfa and Ogwen that aligned with local and national policies. The report summarises that the current over-reliance on cars to access key honeypot sites and the chronic parking problem at busier times of the year is failing the National Park's core purposes.

5.113 Following detailed analysis of data and trends, and in-depth workshops and discussions with stakeholders, the review recommends developing a Sustainable Tourism approach which will:

- Reduce the environmental impact of visitors on the protected landscape.
- Reducing the negative impacts and increase the benefits to local communities and local economy.
- Improve the visitor experience and enable a more diverse range of visitors to enjoy the area.
- Make the special landscape more accessible to non-car-based visitors.
- Transform how the area functions and is perceived.

Sustainable Access for Yr Wyddfa and Dyffryn Ogwen: Public transport management study – 2020-2021 (September 2021)

5.114 Mott MacDonald was commissioned by Transport for Wales to review the opportunities for public car parking in the Yr Wyddfa and Dyffryn Ogwen area. The study defines the network and future operation of bus services, including wider linkages to train services. The study shows how solutions to the problems in inner Snowdonia are much wider than the National Park boundary. It is proposed that the principles set out by the Martin Higgitt Associates report are expanded to include interchanges at Porthmadog, Llandudno Junction, Blaenau Ffestiniog, Caernarfon and Bangor from where bus services could be provided, a potential option for staying visitors as well as day visitors. Car parking needs to address the strong demands for Llanberis, ideally with parking capacity close to the A55 North Wales Expressway. Similarly, Betws-y-Coed has no room for more parking so an alternative site is needed to intercept the high number of visitors from this direction. This approach must provide high quality bus services both to the area and within it, designed to accommodate demand throughout the year.

Active Travel Plans

5.115 The Active Travel (Wales) Act 2013 requires local authorities to develop plans for active travel networks for their area. The Active Travel Network Maps are a tool for local authorities to enhance their forward planning of active travel and should be used to inform, as well as be informed by, the location and design of new development. Cyngor Gwynedd and Conwy's latest Active Travel Plans will be used to inform the review.

Snowdonia Walking and Cycling Strategic Plan (March 2022).

5.116 Transport for Wales has commissioned a study of Active Travel for the Yr Wyddfa and Ogwen area. sets out the vision and objectives to enhance infrastructure, improve safety, and provide easier access for all, and to encourage greater levels of walking and cycling for both leisure and active travel. The aspiration is to create an integrated network that is inclusive for all potential users, regardless of purpose or ability. The study is to recommend active travel routes, working closely with the National Park and Local Authorities on implementing the routes. The first route receiving close attention is a connection from Llanrwst to Betws y Coed.

6 LDP ISSUES AND CONSIDERATIONS, VISION, OBJECTIVES AND STRATEGY

Key Issues, Challenges and Drivers for Change

- 6.1 The existing Eryri Local Development Plan identified key issues and challenges that the LDP seek to address. The key issues and challenges were informed by national, regional and local plans and strategies, evidence base collated during plan preparation and by community engagement.

Vision

- 6.2 The Key Issues and Considerations were used to develop the Eryri LDP and National Park Management Plan Vision and to develop a set of objectives to help deliver the vision. The vision for Eryri National Park was set out in the National Park Management Plan (Cynllun Eryri) and was developed with the input from Eryri Forum and wider stakeholder involvement.

The vision for Eryri in the Eryri LDP is: By 2035 Eryri will continue to be a protected and evolving landscape, safeguarded and enhanced to provide a rich and varied natural environment; providing social, economic and well-being benefits nationally and internationally. National Park purposes will be delivered through a diverse and prospering economy adapted to the challenges of climate change and founded on natural resources – its landscape qualities, opportunities for learning and enjoyment, cultural and natural heritage. With thriving bilingual and inclusive communities partnership working will have demonstrated that more can be achieved through working together. Communities will have adopted innovative solutions in a changing World – a low carbon economy will have strengthened residents' link with the environment, providing a better standard of living and ensuring Eryri's reputation as an internationally renowned National Park and one of the nation's breathing spaces.

- 6.3 Cynllun Eryri has been subsequently revised and a more recent version was adopted in 2020 after the Eryri LDP was adopted in 2019. Only minor revisions were made to the vision and the replacement Plan will need to reflect the revised vision for Eryri National Park and set out how the replacement LDP can contribute to achieving the vision.

Objectives

There are 16 objectives in the adopted Eryri LDP developed taking account of the issues and challenges facing the area and linked to the well-being goals. Issues and challenges and the objectives have all been divided into five themes:

- Protecting, enhancing and managing the Natural Environment
- Protecting and enhancing the cultural and historic environment
- Promoting Healthy and Sustainable Communities
- Supporting the Rural Economy
- Promoting Accessibility and Inclusion

Reconsideration of Key Issues and Considerations, Vision and Objectives

Community engagement and Evidence Gathering

6.4 Community engagement and evidence gathering will identify key issues and challenges that the revised Plan will need to address. It will be an opportunity to reconsider planning policy priorities to assist in the recovery after the Covid-19 pandemic crisis. The environmental, social and economic impacts of the pandemic have had far reaching consequences and raise significant issues for future policy making in Eryri. The pandemic has highlighted the importance of health and well-being, access to services, economic resilience, digital connectivity and the value of the natural environment. We've seen a renewed value placed on the provision of local services, local food, and local quality green space. It is important to ensure that local people are able to live locally and that communities become more sustainable and resilient into the future. The LPA must also meet other duties and responsibilities, including those relating to the environment and climate change. Sustainable, low carbon developments and infrastructure are needed to respond to the climate and nature emergencies. A visitor economy that maintains and respects the environment and protects local communities, language, culture and heritage also needs to be considered.

Cynllun Eryri

6.5 As mentioned in Chapter 5, the Eryri National Park Authority adopted its new National Park Partnership Plan (Cynllun Eryri) in 2020, which sets the Authority's long-term vision for the National Park and sets out what is considered to be the priorities for the next five years and beyond. The revised LDP Key Issues and considerations, vision and objectives, should be reconsidered to ensure alliance with the priorities set out in Cynllun Eryri. It is anticipated that Cynllun Eryri's policies and actions will also be revised in the next few years in parallel with the Eryri LDP to ensure coherence between the Authority's two strategic documents.

Well being, Placemaking and National Sustainability Placemaking Outcomes

6.6 The Well Being of Future Generations Act (2015) concerns the embedding of the principle of sustainable development into all of the work carried out by public bodies and places a requirement on all public bodies to set out how they will progress the 7 well-being goals set out in the Act. The relationship between the Eryri LDP and the Well Being Goals were outlined during plan preparation stage and the revised LDP will need to continue to positively complement the well-being goals and objectives.

6.7 Since the preparation of the LDP there have been some fundamental changes to national policy and guidance with the publication of the Development Plans Manual Edition 3 (March 2020) and PPW, Edition 11 (February 2021). These two documents highlights that Placemaking and the National Sustainable Placemaking Outcomes must be incorporated into the revision of the LDP Objectives. The key aims/objectives of the revised Plan will need to relate to the National Sustainable Placemaking Outcomes, reflect Cynllun Eryri's objectives as well as integrating Gwynedd and Conwy's well-being objectives.

Strategy

National Park purposes and duty

6.8 The National Park purposes and duty will need to continue to provide an important strategic focus for the LDP, as they help define the scale and location of future development in the area. These are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- Promoting opportunities for the understanding and enjoyment of the special qualities of the area by the public.

In addition, the National Park has a duty to:

- Seek to foster the social and economic wellbeing of the local communities within the Park area.

6.9 The National Park purposes and socio-economic duty, supported by the Sandford principle³ and the Silkin test⁴ set a clear statutory framework for development planning within the National Park.

6.10 These purposes and duty provide an important strategic focus for the Plan and help to define the scope of future development in the area.

Special Qualities

6.11 The Eryri LDP needs to ensure that the future of the National Park is founded on its national significance and what makes the National Park special and unique 'its Special Qualities. The revised Eryri LDP will need to continue to ensure that the National Park's Special Qualities (which have been drawn up following extensive engagement and consultation and identified in Cynllun Eryri) are being conserved and enhanced.

Scale of Development

6.12 The relationship between the scale of development and its location is important when considering the impact on the landscape. In comparison with other more urban planning authority areas, the scale of development proposed in the Eryri Local Development Plan is modest. The scale and location of development is considered important when assessing the impact of development on the National Park landscape. Given the sensitive environment of the Park and the scale of local communities, larger development could have significant effects on the character of the landscape and the integrity of the Park environment. National policy is clear in that major development

³ If it appears that there is an irreconcilable conflict between the statutory purposes, greater weight will be attached to the purpose of conserving and enhancing the natural beauty, wildlife, and cultural heritage of the National Park.

⁴ The Silkin test for major development asks 'is the development absolutely necessary in the national interest and is there no possible alternative solution, source or supply?'

should not take place in National Parks except in exceptional circumstances and will need to be reflected again in the revised Eryri LDP.

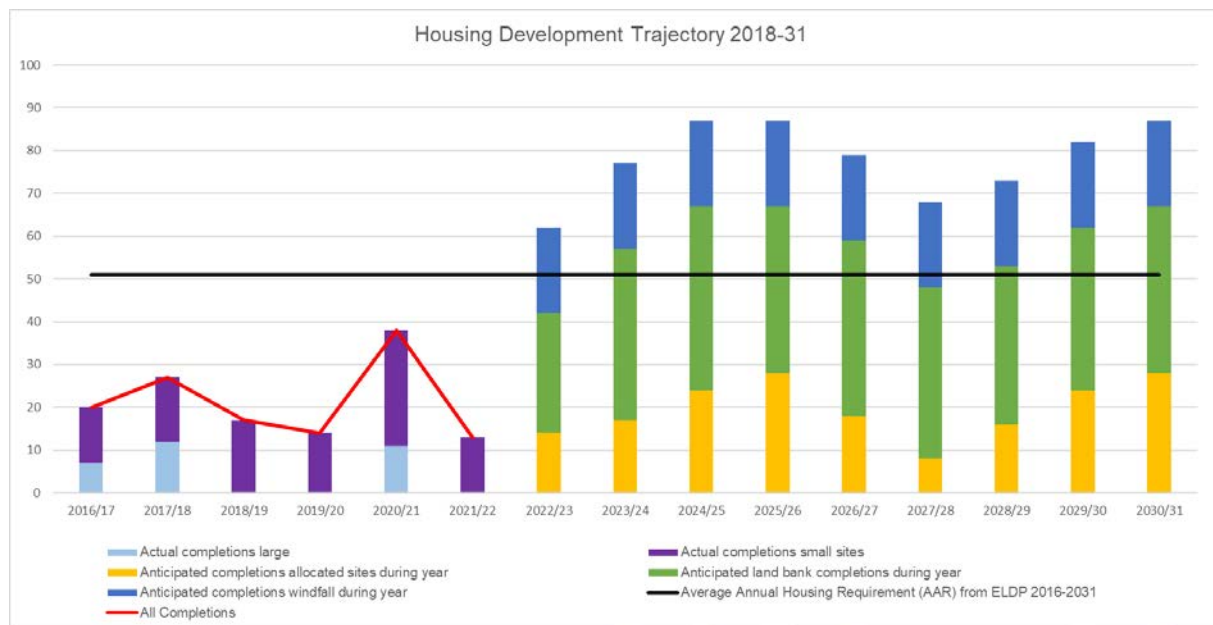
Growth Strategy

6.13 The housing requirement figure in the adopted Eryri LDP was based on the 2014 household projections which indicated that the rate of new household growth was slowing down in the Park. Consideration was also given to past completion rates, social, environmental and economic considerations particular to the National Park. Taking the above factors into account the requirement for new housing during the plan period was calculated at 770 dwellings (51 dwellings per year) from 2016-2031. This included an Affordable Housing Target of 375 new affordable homes to be delivered during the plan period. Strategic policy G: Housing and Development Policy 30: Affordable Housing provide the policy framework for delivering the 'Housing Growth Strategy'.

6.14 Local Planning Authorities who adopted an LDP prior to the publication of the Development Plan Manual Edition 3 in March 2020 are required to create a housing trajectory based on the actual completions to date, and set out the timing and phasing of sites/supply in the remaining years of the plan period.

The following housing trajectory graph and text shows the annual level of housing completion monitored against the average annual requirement (AAR) set out in the LDP, both in numerical and percentage terms.

Graph 1: Housing Trajectory Graph - as amended through the AMR



6.15 The Graph shows there is an annual shortfall against the AAR 'black line' in 2021/22. **In this year completions are 38 units below what was anticipated (51 AAR vs 13 actual completions, - 75%).** The number of dwellings that have been constructed each year have been consistently below the annual average requirement (AAR) of 51 dwellings per annum for every year since 2016-17.

- 6.16 The cumulative required build rate from the start of the plan period 2016 to 31st March 2022 as set out on the 'black line' was 306 units. **Actual completions 'red line' have been 129 units, representing a 177 unit shortfall in housing delivery over the plan period to date (-42%).**
- 6.17 For the remaining nine-year period of the plan, the amended supply bars are the outcome of the Snowdonia National Park's Housing Stakeholder Group and shows that supply exceeds what is left to build cumulatively and annually. Anticipated completions are higher than the AAR rate, and cumulatively would be delivering 702 units, higher than the AAR number of 459 for that period. However, given the very low completion rates and permission being granted, the development industry's activity in the National Park as well as the latest published 2018 based household projection figures, along with other issues identified within this AMR, a lower plan requirement figure may need to be considered as an option in future revisions of the Eryri LDP.
- 6.18 In respect of housing completions only, the plan is falling short of what is intended. There has been a shortfall of cumulative housing completions against Annual Average Requirement (AAR) for 5 consecutive years. Reasons for the shortfall include a lack of large sites coming forward, both allocated and windfall and low Housing association activity. This is discussed in more detail within Chapter 7.

Spatial Development Strategy

- 6.19 Eryri's population is small and geographically dispersed and the scale of proposed new development is relatively small to serve the existing population. The Spatial Development Strategy seeks to maintain the viability and vibrancy of local communities in a sustainable way appropriate to the National Park. The level of development needs to be proportionate to the size and population of individual settlements and their capacity to accommodate further development. The aim of Strategic Policy C (SP:C) is to direct development of all types to the most appropriate location. SP:C allows for the development of new housing, employment and the provision of services and facilities within settlements according to their designation within the settlement hierarchy, with the overall aim of making communities more self-sustaining. Bala and Dolgellau are the local service centres where most housing and employment related development will take place. Service Settlements are considered to have the ability to supplement the services provided by the Local Service Centres. However due to environmental and landscape constraints in the Local Service Centres and in Service Settlement, this limits their capacity to accommodate new development. Some of this capacity has therefore been diverted towards the Secondary Settlements which are the larger villages. The strategy recognises that small scale housing, employment and other development in Secondary Settlements, Smaller Settlements and sometimes in the open countryside is sustainable where appropriate opportunities arise. All planning applications received since adopting the revised Eryri LDP (2016-2031) have been determined in accordance with Strategic Policy C: Spatial Development Strategy and therefore in compliance with the main spatial strategy outlined in the Plan. Further detail regarding the distribution of housing consents and completions between settlement tiers is included in Chapter 7: Promoting Healthy and Sustainable Communities.
- 6.20 Although there have been no significant developments permitted which undermine the existing Plan's Spatial Development Strategy, the need to review the LDP and its Strategy has become evident. The number of dwellings that have been completed annually have been consistently below the Annual Anticipated Housing Requirement of 51 dwellings and therefore falling short of the LDP growth strategy. The reconsideration

of the Growth Strategy will mean that reconsideration will also need to be given as to how growth is distributed.

- 6.21 Significant changes have also occurred in the planning policy context, particularly at a national level with the publication of Future Wales 2040 in February 2021 which has its own Spatial Strategy which will need to be taken into consideration. Updated editions of Planning Policy Wales (PPW) also requires LDPs to include an integrated planning and transport strategy which will have to inform the spatial strategy and overarching strategy of the Replacement LDP. The LDP will need to be revised to reflect the emphasis within these documents on the principles of placemaking and sustainable development, including the National Sustainable Placemaking Outcomes. The review of the Spatial Strategy will include stakeholder involvement and evidence gathering (including a revised settlement assessment and a review of the allocated sites). It's fundamental that the replacement Plan Strategy provides a clear steer to actively reduce carbon and continues to address the causes and effects of climate change. The Strategy will need to take into consideration the priorities set out in Cynllun Eryri, respond to the nature emergency, consider issues such as recovery from the Covid-19 pandemic and constraints such as future changes to TAN 15 flood development maps and phosphorous levels in Special Area of Conservation (SAC) riverine catchments. The Strategic Flood Consequences Assessment Review currently being undertaken by Ymgynghoriaeth Gwynedd Consultancy (on behalf of Eryri NPA, Gwynedd Council and Anglesey Council) will help inform the growth distribution and the process of selecting sites within the replacement plan.
- 6.22 It will be important to consider areas outside of the National Park and their influence on National Park communities. There are strong relationships between settlements outside the National Park boundary in providing many essential services and facilities. It is also important to ensure a joined up approach to planning for those settlements which straddle the Park boundary. The Authority will continue to collaborate with neighbouring authorities on issues faced in shared settlements.

7 LDP TOPIC AREA REVIEW

- 7.1 The policies in the adopted Eryri LDP have been reviewed having regard to:
- Annual Monitoring Report findings (AMR 2020, 2021 and 2022) (Chapter 3)
 - Other contextual changes and changes in evidence base (Chapter 4)
 - Changes in National legislation and National, Regional and Local Policy (Chapter 5)
 - Engagement with relevant officers within the Authority
- 7.2 This chapter discusses the individual topic areas that are likely to require amendments to LDP Policy based on the policy review assessment. Individual topic areas are grouped by Eryri LDP Chapter headings. The following policy assessment is not considered to be definitive and further consideration will be given to the need to revise other LDP policies during Eryri LDP revision process.
- 7.3 A short summary of the review of each Eryri LDP policy giving an overview of whether the policy is functioning effectively, whether it needs to be reconsidered due to contextual changes or whether it needs to be revised or amended to improve clarity has been included as part of the summary section at the beginning of the Review Report. There are instances where policies are being implemented effectively but may need to be revised to ensure coherence with the Plan as a whole.

Protecting, Enhancing and Managing the Natural Environment

Policies (DP2, SPA, SPD, SPDd)

- 7.4 It will be important that the review of the Eryri LDP focuses on reversing biodiversity decline and gives preference to the provision of nature-based solutions. Resilient ecological networks are integral to health and well-being and forms part of the response to climate change. Policies will need to be revised to ensure proposals result in a net benefit for biodiversity. Consideration should be given to how the site relates to surrounding ecosystems and biodiversity. Policies should ensure that proposals proactively maintain and enhance biodiversity and ecosystems with a focus on avoidance, minimisation and mitigation of impacts within the context of the site.
- 7.5 Green infrastructure has a key setting within Planning Policy Wales and Future Wales: The National Plan 2040. PPW notes that green infrastructure is the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places.
- 7.6 Green Infrastructure comprises of features such as;
- Woods
 - Street trees
 - Ponds, streams, lakes and wetlands
 - Meadows and grasslands
 - Roadside verges
 - Parks and gardens (open areas that once held buildings – brownfield land)
 - Landscaped grounds around offices and factories
 - Green roofs and green walls

- Any features with plants or water
- 7.7 At a local scale these might comprise of parks, fields, public rights of way, allotments, cemeteries and gardens. At smaller scales individual interventions such as street trees, hedgerows, roadside verges and green roofs/walls can all contribute to green infrastructure networks.
- 7.8 These features provide a range of natural functions and uses, by improving our connectivity through footpaths and cycle paths; by generating space for nature by linking habitats, establishing recreational facilities and 'green' our urban areas making them more resilient to the impact of climate change. Natural Resources Wales note that the ecosystem benefits that could potentially be derived from urban greenspace are substantial. In the past, the importance of these areas in terms of general health and well-being wasn't always appreciated, meaning their potential was never realised. Improvements in green infrastructure can also result in the reduction of noise pollution, soaking up rainstorm water, trapping air pollution and creating places for exercise.
- 7.9 PPW notes that the planning system should protect and enhance green infrastructure assets and networks. Additionally the protection and enhancement of bio-diversity must be carefully considered as part of green infrastructure provision. The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, green infrastructure can embed the benefits of bio-diversity and ecosystem services into new development and places. There are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents. Landscaping, green roofs, grass verges, sustainable urban drainage and gardens are examples of individual measures that can have wider cumulative benefits, particularly in relation to biodiversity and the resilience of ecosystems as well as in securing the other desired environmental qualities of places.
- 7.10 PPW notes that planning authorities should adopt strategic and proactive approaches to green infrastructure and biodiversity by producing up to date inventories and maps of existing green infrastructure. Titled 'Green infrastructure assessments', these should be used to develop a map based evidence resource and they should draw from the evidence base provided by Area Statements and well-being assessments and be integrated into development plans.
- 7.11 Consideration will need to be given towards 'Green Infrastructure Assessments' and the need to draw from the evidence base provided by the NRW Area Statements in order to consider how significant benefits can be delivered through green infrastructure. This may involve identifying opportunities to improve water management (such as flood mitigation, mitigating phosphate pollution and sustainable drainage systems), air quality, and adaptations of ecosystems habitats and species to climate change. Planning authorities will need to ensure that development minimises impact and provides opportunities for biodiversity enhancement, which is linked to Welsh Government's bio-diversity gain goals. Planning authorities will also need to encourage the appropriate management of features of the landscape which are of major importance for wild flora and fauna in order to complement and improve the Natura 2000 network. The assessments will need to be regularly reviewed to ensure information on habitats, species and features are kept up to date, and could be incorporated into future annual monitoring reports. Replacement LDP will need to consider how to incorporate Green Infrastructure policies which not only relate to biodiversity and geodiversity but also open space, flooding, landscape and placemaking.

- 7.12 In terms of Area Statements, the following key themes for the north west Wales area will need to be taken into consideration in revising LDP policies:
- Collaborative working
 - Climate and environment emergency.
 - Encouraging a sustainable economy – process to develop sustainable opportunities for the economy and the environment. This includes identifying sustainable approaches to economic opportunities that enhance the natural resources unique to the area.
 - Reconnecting people with nature – creating opportunities to access and understand the value of the countryside so that communities can reconnect, understand, engage and influence the creative use of the local nature environment
 - Opportunities for a resilient ecosystem – ensuring we all work together to improve ecosystem resilience in the area. A need to reverse decline, and act to enrich biodiversity
 - Supporting sustainable land management – working with air, land and water managers across north west Wales to promote and develop sustainable resource management contributing to the health of all life in the area.
- 7.13 Strategic Policy D: Natural Environment will need to be updated to reflect changes arising from the UK's withdrawal from the European Union whereby 'European Sites' are now referred to as 'National Site Network'.
- 7.14 Further consideration and assessments will need to be undertaken regarding the issue of phosphorous levels in riverine special areas of conservation (SAC) waterbodies within the National Park and in particular the River Dee SAC (although there are 4 riverine SACs in the National Park – more than any other Local Planning Authority in Wales). LDP policies will need to be screened as well as assessing allocations proposed to be connected to mains wastewater treatment works.
- 7.15 As mentioned previously in Chapter 3, 'Future Wales 2040' also contains Policy 15, which is a commitment to the designation of a National Forest. Whilst details about, scale and location and how it relates to the planning process are unclear at this point its landscape impact and potential economic and social implications will need to be considered further. Consideration will also need to be given to indirect implications of new land management practices such as new access to ensure that development does not harm the character of the landscape in which they are located.
- 7.16 It is considered that more could be done to protect Eryri's Dark Skies through the implementation of planning policies and to provide further guidance to businesses and communities on how they can create an environment that supports dark skies, and to become dark sky friendly.
- 7.17 The pandemic has brought wider environmental issues into focus and has highlighted that the environment and climate change need to be prioritised in the recovery following the pandemic. The significance of climate change will require an even greater focus within the LDP review. Work currently being undertaken on the subject, specific to the National Park, will help inform if/where policies are currently lacking, or if more could be done, in order to reduce emissions towards net zero as well as adapt to the impacts of climate change.
- 7.18 Eryri LDP policies aim to reduce carbon and contribute to the absorption of carbon. For example Policy Dd (Climate Change) within the plan enables the conservation and protection of woodlands, upland soils and peatland areas to assist in carbon retention.

It's fundamental that the replacement Plan Strategy provides a clear steer to actively reduce carbon and continues to address the causes and effects of climate change. It is considered that the Climate Change policy needs to be revised and further detailed guidance required in order to be more proactive in mitigating and adapting to the effects of undesirable change. It's important that decarbonisation goes to the heart of the Plan Strategy and ensure coherence between policies throughout the Plan. DP3: Energy will need to be revised to reflect the changes in requirements for Design and Access Statement and consider the use of Energy Statements.

Protecting and Enhancing the Cultural and Historic Environment

Policy (SP Ff: Historic Environment)

- 7.19 This Policy will need to be modified to reflect the updates within the Historic Environment context. For instance, the previous Candidate World Heritage Site, The Slate Landscape of Northwest Wales, has since been designated as a World Heritage Site, the Authority's Conservation Areas Project, as well as measures regarding the Climate Change Agenda, and any additional legislation and guidance. This can also lead to changes to Development Policy 6: Sustainable Design and Materials, Development Policy 7: Listed and Traditional Buildings, Development Policy 8: Protection of Non Designated Sites, Development Policy 9: Conversion and change of use of rural buildings, and possibly Development Policy 10: Advertisements and Signs.
- 7.20 'Identity' is one of the six placemaking principles adopted within the Placemaking Charter and within PPW, which emphasises the importance of valuing and respecting the unique features and opportunities of a location including heritage, culture, language, built and natural physical attributes. This should be identified, responded to and reflected in revised LDP Policies.
- 7.21 The emphasis on ensuring sustainable development within a holistic approach runs through PPW. Eryri LDP policies must ensure that the impact on the historic environment, on the significance and heritage values of individual historic assets, as well as their contribution to the character of place, is fully considered in assessing development proposals. It will be necessary to ensure that the protection and improvement of the historic environment along with the holistic approach to planning is reflected when revising the LDP.

Policy (DP 6: Sustainable Design and Materials)

- 7.22 In light of the Climate Change Agenda and the effect on the Historic Environment, as well as any amendments and developments within National Policy and Legislation, and in particular placemaking principles this Policy will need to be amended when revising the Local Development Plan.

Policy (DP7: Listed and Traditional Buildings)

- 7.23 There was an appeal regarding a specific development within the National Park, where Development Policy 7 of the Eryri LDP, and in particular the Traditional Buildings Register and the criteria to include a building on the register was questioned by the Inspector.

- 7.24 Development Policy 7 includes criteria for the development and protection and enhancement of Traditional Buildings as well as Listed Buildings, with further specific criteria for Listed Buildings. By the Planning (Listed Buildings and Conservation Areas) Act 1990 Listed Building Consent is required for all works of demolition, alterations or extension to a listed building that affects its character as a building of special architectural or historic interest. This is not required for buildings on the Traditional Building Register, outside of a Conservation Area and/or an Article 4 Designation. Notwithstanding, as stated within paragraphs 4.20-4.22 of the Eryri LDP, the character of Snowdonia owes much to its Listed Buildings and the rich tradition of construction styles and variety of materials which reflect and characterise the local architectural vernacular. Whilst not achieving the 'special' status of Listed Buildings, these traditional buildings still require protection from inappropriate change. Traditional Buildings are of significance as they contribute to the local architectural character and traditions of the area. As the list is not definitive, additional properties may be added to it periodically. Therefore, any proposal which is of scale, design, or relies upon materials that are considered inappropriate will not be permitted.
- 7.25 The appeal concerned a conversion of an outbuilding from a former bunkhouse/annex store to one room annex accommodation. The application was originally refused by the Authority due to findings that it would contravene Development Policy 7. Through the appeal process, this decision was overturned by the Inspector, finding that the works would not be inappropriate and would therefore not contravene with Development Policy 7, stating that "*...it is not reasonable to apply the same tests to the minor outbuilding of a much altered, traditional building as would be applied to a listed building.*" (Appeal Ref: APP/H954/A/21/3280822). Although identified as a 'Traditional Building' on the Register, alterations to the building had occurred outside of Planning Control, leading to the conclusion by the Inspector that it is not practical to place the same protection on traditional buildings that have changed dramatically, as on listed buildings.
- 7.26 Since this appeal case decision however, the 'Local Listing of Historic Buildings' letter by the Deputy Minister, has requested for Local Planning Authorities in Wales to ensure active steps to protect historic and traditional buildings that are outside the national protection threshold.
- 7.27 In reviewing the LDP, it will therefore be necessary to consider appeal case APP/H954/A/21/3280822 and the 'Local Listing of Historic Buildings' letter, regarding Development Policy 7: Listed and Traditional Buildings.

Policy (DP 8: Protection of Non Designated Sites)

- 7.28 In light of the Climate Change Agenda and the effect on the Historic Environment, as well as any amendments and developments within National Policy and Legislation, this Policy will need to be amended to reflect this.

Policy (DP 9: Conversion and change of use of rural buildings)

- 7.29 In light of the Climate Change Agenda and the effect on the Historic Environment, in requiring the thermal upgrading and improving the energy efficiency of historic buildings, as well as any amendments and developments within National Policy and Legislation, this Policy will need to be amended to reflect this. Regulatory changes have also been introduced which will allow greater control of changes between different types of residential uses. There are new use classes for primary dwellings, second homes and short-term holiday accommodation which will need to be taken into consideration when

revising DP9. . Additionally, it will be necessary to consider the current provision of existing serviced holiday accommodation and the growth in self-serviced holiday accommodation developments when revising DP9.

Policy (DP 10: Advertisements and Signs)

7.30 This Policy will need to be amended to reflect any changes or updates within National and Local Policy, as well as the findings of the Conservation Areas Project in order to protect and improve the areas for the future.

Promoting Health and Sustainable Communities

Housing Growth

(Policies SP G, DP30)

7.31 The Growth Strategy, which forms the basis for Strategic Policy SP G, was based on the identified Dwelling Requirement Figure of 770 additional new homes to be completed between 2016 and 2031. The number of additional new homes completed by the end of March 2022, as captured through monitoring, has resulted in a shortfall.

7.32 The number of housing completions for 2021/22 was 13 units, a considerable decrease from 2020/21 completion figure of 38 units, and well below the average annual housing requirement target of 51 units. The Housing Trajectory shows an annual shortfall against the Annual Anticipated Housing Requirement (AAR) during 2021/22 with this years' completions 38 units below what was anticipated (51 AAR vs 13 actual completions, - 75% in percentage terms). The number of dwellings that have been completed annually have been consistently below the (AAR) of 51 dwellings per annum since 2016-17. There is a shortfall of -42% for cumulative required build rate from the start of the plan period, 2016-17, up to 31st March 2022. The plan is falling significantly short of what is intended; there has been a shortfall of cumulative housing completions against the AAR for 5 consecutive years.

7.33 There may be several local and wider national reasons for the low numbers. The housing market in the National Park is localised in nature, relying on small local builders and self-build projects on small sites. There are no regional house builders active in the market and therefore there is very limited speculative building of open market and affordable housing. The decrease may also in part be due to the difficult borrowing environment for developers, small builders, and self-build projects.

7.34 The 2018 based household projections for the National Park were published in May 2021. These projections estimate that between 2018 and 2028 the population of the Park will decrease by 1.92%. During the same period the households in Snowdonia is projected to increase by 40 units (0.3%), a very modest increase within a 10-year period. A falling population and slower new household formation rates suggests that a lower overall housing requirement figure may be more suitable when revising the LDP. The 2021 census data also shows that the population and households of Gwynedd has decreased which will ultimately have an impact on future dwelling requirements. A lower housing requirement figure would also reflect past completions and the current housing development industry's ability to deliver within the National Park. Further National Park projections are expected in 2024.

- 7.35 Due to increasing pressures on the local housing market exacerbated by Covid 19 and the resulting impact on the sustainability of local communities; a review of LDP housing policies is required. Initial analysis of house prices, incomes, second homes and holiday let data for the National Park area suggests that LDP policies should consider focusing on achieving accessible local market housing and affordable housing to secure the long-term viability of Snowdonia's local communities.
- 7.36 Changes in the Authority's housing policies through the 2016-2031 Eryri LDP revision, by increasing the thresholds requiring affordable housing provision within settlements, were expected to stimulate the housing market to increase choice and overall completion rate as well as supporting small builders and the local economy, however this has not happened in the first three years of monitoring the policy. A plan wide viability assessment will be required for the Eryri LDP revision in order to determine the affordability thresholds that housing developments are able to deliver.
- 7.37 Further research is required to explore local market housing and primary residency housing policies, analyse relevant evidence and indicators and examine how they have been implemented and delivered in other Authorities. Further work is needed to investigate the possibility of considering local market housing as well as re-examining the housing development boundaries and assess settlement capacities.
- 7.38 Further detailed research and analysis will be undertaken of the type of sites that have been permitted in the National Park since the adoption of the LDP. Housing data will need to be analysed in respect of the number of private sector, self-build, intermediate and social housing units brought forward in the National Park and compare with other rural areas and national patterns. The Authority will also need to analyse windfall development and potential sites. The data will feed into the evidence base included in the Housing Background Paper, to inform the next review.
- 7.39 The potential contribution of a community-led housing, co-operative housing and land trusts should also be considered. The Authority is involved in discussions with key partners and community groups on initiatives that could enable communities to establish community-led housing, be it new-build or managing existing stock. Policies should enable and promote community-led schemes. Collaboration with Gwynedd and Conwy local housing authorities will continue to assist with the implementation of their Housing Strategies. The Authority will seek to assist with Cyngor Gwynedd's recent Housing Action Plan, its housing need identification work, and any plans to develop affordable housing within the National Park area.

Housing Allocations

(Policy Strategic Policy G)

- 7.40 The LDP's residential allocations, identified in ELDP Strategic Policy G, will require amendment as part of the revision process. Undelivered Housing Allocations will need to be reconsidered, which is likely to result in some existing allocations not being taken forward into the Replacement LDP. It will also be necessary to consider allocating new deliverable and viable sites to meet the revised Dwelling Requirement Figure over the new Plan period. The status of each Housing Allocation identified in the current Eryri LDP is summarised in Appendix 2.

Affordable Housing

(Policies SPG, DP30, DP11)

- 7.41 The Eryri LDP sets an Affordable Housing Target of 375 new affordable homes to be delivered during the Plan period (2016-2031). In total 53 affordable dwellings have been completed between 2016 and 2022, meaning a further 322 new affordable homes need to be delivered over the remaining nine years of the LDP. Based on past build rates and the number of schemes coming forward this is not considered to be achievable.
- 7.42 The delivery of affordable housing in the National Park depends considerably on Housing Association activity. Permissions and completions by Housing Associations helped to increase the affordable housing figures for the second year of monitoring but were absent from the first and third year. The Authority must continue to work closely with Housing Associations to ensure that affordable sites continue to come forward and are delivered, and to ensure that deliverable housing allocations are included in the new plan. The AMR housing numbers over the first 3 years of monitoring (and further) demonstrates that in the current economic climate, the low number of private sector housing development is not delivering affordable housing within the National Park and that affordable housing delivery is heavily dependent on Housing Associations. No private allocations are coming forward for development, and therefore do not provide a contribution of affordable housing. Input from developers suggests that economic factors are a significant factor in not developing allocations and sites with planning permission. There are no large private sector allocations, windfall sites or exceptions sites coming forward, meaning the required % contribution of affordable housing from such sites is not being provided. It may demonstrate that large scale private developments are not deliverable within the national park area, or that there is no private sector interest to develop within the National Park. There is more activity, albeit low in numbers, from single plot developments, which tend to be self build plots/ custom build plots by local builders, to provide for their own needs, and not development purely for profit and investment purposes. This suggests that future policies may need to focus on the provision of housing for the local market, and affordable housing. The replacement Plan will need to consider what can realistically be delivered by the industry (private, social and self / custom build) in Eryri.

Second homes and short term holiday let

(Policies DP9, DP30)

- 7.43 The number of second homes and short-term holiday lets has become a significant issue within the national park and the wider North West Wales area. Increasing numbers are contributing to increased house prices and a reduced housing stock available to rent or purchase by the local community. This has an impact on the sustainability of viable communities and the Welsh language. Regulatory changes have been introduced which will allow greater control of changes between different types of residential uses and the formation of planning policies. There are new use classes for primary dwellings, second homes and short-term holiday accommodation. Whilst it is a permitted development to move between the classes, Local Planning Authorities have the power to introduce Article 4 directions to remove these permitted development rights. If an Article 4 direction is to be adopted, it will require gathering of further evidence for careful consideration and collaboration with other authorities, together with public consultation. Work to introduce an Article 4 direction would involve a considerable amount of resources and may have a significant impact on the local housing market. The new use classes and adoption of an Article 4 direction within the National Park, will need to be addressed by new or amended policies. A clearer policy on conversions and changes of use to second homes and short term self-catering lets within settlement boundaries should also be considered.

Specific Housing Policies

(Policies DP11, DP30, DP9, DP15, DP16)

- 7.44 LDP Policies DP9 and DP30 - affordable housing via conversions have been below the numbers set by monitoring targets. This reflects the low number of affordable housing being delivered overall within the current economic climate. The introduction of new housing use classes and an Article 4 direction will require the conversion policy to be re-considered, with consideration given to how it can contribute to affordable housing and local market housing. Consideration should also be given to more specific policy criteria for conversions within settlement boundaries.
- 7.45 LDP Policy DP11: No affordable housing units have been permitted or completed on exception sites during the three years of monitoring the current plan. The affordable requirement and the need for a S.106, plus difficulties obtaining a mortgage, may be discouraging development, coupled with other wider economic factors. Further research and consideration is required on the role of exception sites and other options that could be made possible under the policy.
- 7.46 LDP Policy DP 15: Extensions. Issues identified with wording/interpretation of this policy may require reviewing and discussions are required with the Development Management Section on how the policy has been implemented.
- 7.47 LDP Policy DP 16: Current policy contains criteria that relates to replacement dwellings outside development boundary. Given current pressures on housing markets and land availability that could lead to replacement dwellings being increasingly considered as an option for developers, consideration to be given to extending the policy criteria to include replacement dwellings within the settlement boundaries, to ensure developments do not detract from the local character and setting.

Gypsy and Traveller Sites

(Policy DP13)

- 7.48 The policy framework provided through LDP Policy DP13 Gypsy and Traveller Sites, recognises that need for a Gypsy and Travellers site may arise outside of the findings of the Gypsy and Traveller Needs Assessments. Where this is the case the Authority will consider applications on a case by case basis in line with the criterion set out in Development Policy 13.
- 7.49 The need for Gypsy and Travellers sites will need to be considered during the review. The recommendations of Gwynedd and Conwy Council's Gypsy and Traveller's Accommodation Needs Assessments will be considered, and suitable sites will be considered for allocation if a need is identified. The assessments to date have not identified a need within the National Park area.

Welsh Language

(Policy 18)

- 7.50 The Welsh Government has set an ambition to see the number of people able to enjoy speaking and using Welsh reach 1 million by 2050. To deliver on this aim, the LDP must support, promote and enhance the Welsh language as a viable community language by ensuring that there are sufficient and proportionate employment and housing opportunities to sustain local communities. Specific policies will need to provide further guidance to ensure that development of an appropriate scale, type and character is delivered to meet the needs of local communities. Furthermore, the revised LDP will need to ensure that development occurs at a rate which can be absorbed and assimilated without damaging the character of communities.
- 7.51 Adverts and signs are a method of promoting the distinctive culture of Snowdonia and can contribute enormously to the Sense of Place. When revising the LDP it will be important to consider strengthening policies, and this may include;
- Requiring that adverts and signs are at least bilingual
 - Requiring that new developments and/or streets have Welsh names. This could also be extended to the introduction of protection measures to the original Welsh names of traditional, historical or listed buildings (to ensure that their names are not changed).
 - Introduce wording on language enhancement (similar to that seen with biodiversity enhancement). Currently the policy and Welsh Language SPG only asks for enhancement/mitigation from relevant developments; a requirement in the revised LDP could be a potential improvement to the policy that would benefit the Welsh language.
- 7.52 The Authority is only able to offer encouragement in the above currently. In the revised LDP it will be assessed whether these measures could be brought in as a matter of requirement. This is particularly relevant in light of the recent Welsh language Census 2021 results.

Supporting a Sustainable Rural Economy

Employment

Policies (SPH, DP9, DP19, DP24)

- 7.53 As a result of the Pandemic we have seen a significant increase in the number of people working from home, particularly in the office-based sectors of the economy. Even when all the restrictions are lifted, this is likely to affect where people work in the long term. LDP review will need to consider the implications of more people working from home in the long term.
- 7.54 As part of the future LDP review the Authority will need to work with neighbouring planning authorities to re-examine economic forecasts and update the Employment Land Review to ensure that the supply of land for employment is adequate and fit for

the future. Employment allocations will need to be reviewed and, where change is needed, this should be to the best use of land for placemaking. This may mean sites with good public and active travel links being designated for other mixed uses. It may also mean surplus unsustainable sites are removed from development plans altogether. Work has begun on a collaborative study (between Snowdonia National Park, Gwynedd Council and Anglesey Council) to look at reviewing and assessing the employment land provision to assist in forming the evidence base for the Eryri Local Development Plan.

- 7.55 Future Wales (February 2021) states that “Local Development Plans should identify the role of the foundational economy, consider how the land-use planning system can support it and develop appropriate policies. Areas of the foundational economy which the planning system can support include regeneration initiatives, health and social care, social housing, tourism and steps to encourage greater community benefits from new development.” It is therefore anticipated that the Replacement Eryri LDP will include economic development policies relating to the foundational economy.

Snowdonia Enterprise Zone Policy (DP27)

- 7.56 The Snowdonia Enterprise Zone that includes the former nuclear power station site at Trawsfynydd and the former airfield at Llanbedr has the potential to create new quality job opportunities. Within the Enterprise Zone Designation at Llanbedr, uses associated with aviation, aerospace will be encouraged by the National Park, alongside other B1, B2 and B8 uses. At Trawsfynydd Enterprise Zone, policies direct uses towards those connected to nuclear decommissioning, low carbon energy business, energy generation technologies and research and development. No applications for development within the Snowdonia Enterprise Zone have been received during the period of the AMR, however it was announced during June 2020 that the Trawsfynydd site had been selected to lead on Magnox’s reactor decommissioning project in the UK. This will see decommissioning work brought forward and secure employment in the area. It is envisaged that there will be a decommissioning programme of 20 years at the site, with three main phases. In order to ensure that the National Park are kept up to date with the latest developments within the Trawsfynydd site, Policy officers are part of the Trawsfynydd Strategic Site Group meetings as well as the UK wide Nuleaf (nuclear legacy advisory forum) groups. An additional Nuleaf group has recently been set up with a Welsh focus and the first meeting will be held during late 2021.
- 7.57 ‘Future Wales 2040’ national plan highlights the potential of a SMR being located at Trawsfynydd in the future. It will be important for the Authority to be involved in future discussions about the possibility of the SMR being located in Trawsfynydd and the effects of the reactor and any associated developments on the character of the National Park’s landscape, visual amenities, natural environment and biodiversity and cultural heritage. Currently there are ambitions to bring forward a programme which would involve construction for an SMR, at the Trawsfynydd site, to begin in 2027. Current ELDP policies recognise that this site could accept low carbon energy businesses and energy generation technologies, provided there are no negative effects on the landscape.
- 7.58 The objectives for the site (and the SMR development), according to Ambition North Wales, are to;
- Save up to 2,660,000 tonnes of CO₂e savings
 - Create up to 557 new jobs
 - Generate up to 700MW new installed capacity using low carbon energy

Agricultural Diversification

7.59 The uncertain future of the agricultural sector following Brexit and changes to the payment regime and their impact on communities within the National Park will need to be kept under review. The Sustainable Farming Scheme sets out the proposals for 2025, and is set to replace Wales' Basic Payment and Glastir schemes from 2025. The details of the new payment scheme is still unknown and may lead to pressure to diversify and pressure to be more productive on improved land. It is felt that the LDP's current policies facilitate agricultural diversification schemes. Diversification methods that are likely to come forward in Eryri in the future are: alternative tourism accommodation, conversion of buildings to alternative uses, more local food production, (possibly food processing units, farm shops, abattoir), chicken sheds, dairy sheds / parlours, renewable energy, wind, water, solar. The agriculture diversification policy (DP 20) is still considered appropriate.

Retail

Policies (DP24)

7.60 Retail assessments in Local Development Plans will be replaced by Town Centre Assessments. They should no longer look at retail need alone but encapsulate a wider array of use requirements, particularly in the employment, leisure and public service sectors. This will have implications for the plan review and also towards the designation of retail areas within the five main towns of the National Park. It may be that our monitoring framework in terms of employment and retail purposes will be different due to the change in policy from Welsh Government (for example more focus on reducing vacant units and less focus on A1/Non A1 uses breakdowns).

7.61 The document 'Building Better Places - the Planning System Delivering Resilient and Brighter Futures' highlights the need for Town Centres to become places where a variety of retail, employment, commercial, community, leisure, health and public sector uses come together in a hub of activity to make them viable as go-to destinations once more. Flexible, local co-working spaces could also be a crucial new element to increase space to work, and there may be a need for new policies in the LDP Review to deliver this.

Tourism and Recreation (DP28)

Policy (DP21: Tourism and Recreation)

7.62 There are developments within Policy and Legislation, as well as National, Regional and Local Context where this policy may need to be amended slightly in order to reflect the current guidance and context. Planning Policy Wales emphasises the need to '*encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities*'. The importance of enhancing the sense of place of an area which has intrinsic value and interest for tourism is also highlighted. PPW also recognises that in some places there may be a need to limit new development to avoid damage to the environment or the amenity of residents and visitors.

- 7.63 Planning Policy Wales also highlights that in addition to more traditional forms of rural tourism, planning authorities should plan positively for active, green and cultural tourism where they are appropriate and that development should be sympathetic in nature and scale to the local environment. The scale and broad distribution of existing and proposed tourist attractions should be considered and complementary developments such as accommodation and access should be provided in ways which limit negative environmental impacts as well as consider the opportunities to enhance biodiversity. It will be necessary to ensure that any amendments to tourism policies will sustainably promote the rural economy without adversely affecting the special qualities of the National Park.
- 7.64 It will also be important that the following three core principles for a sustainable visitor economy as identified in **Gwynedd and Eryri Sustainable Visitor Economy 2035: Strategic Plan** are also reflected in future policies.
1. Celebrate, Respect and Protect our Communities, Language, Culture and Heritage
 2. Maintain and Respect our Environment
 3. Ensure that the advantages to Gwynedd and Eryri communities outweigh any disadvantages

Policy (DP28: New Build Serviced Accommodation)

- 7.65 The indicator within the past three Annual Monitoring Reports measuring the effectiveness of the recently adopted policy within the current Eryri LDP, Development Policy 28: New Serviced Accommodation, reported that no applications for new build serviced accommodation were permitted within or adjacent to the main built up areas of local service centres, service settlements and secondary settlements. It is necessary to ensure that a range of different types of sustainable visitor accommodation are developed in Eryri, therefore this policy may need to be examined through the review process. Of course, the lack of new serviced accommodation may be due to the context of the COVID pandemic where self-serviced accommodation was more desirable in terms of safety and to comply with the guidelines of the time. The veracity of this can be implied by considering the findings of AMR regarding Development Policy 22: Chalet and Static Caravan Sites and Development Policy 23: Touring and Camping Sites, with the improvement of many site, as well as the consistent number of small-scale developments considered under Development Policy 29: Alternative Holiday Accommodation, along with the applications for the change of use of existing serviced accommodation to self-serviced holiday accommodation, and the conversion of agricultural buildings to serviced holiday accommodation. The decline in the existing serviced accommodation, along with the loss of locally important buildings will need to be considered when reviewing the policy, and the implications for other policies, such as Development Policy 9: Conversion and Change of Use of Rural Buildings.

Policy (DP22: Chalet and Static Caravan Sites)

- 7.66 No major implications have arisen by assessing this policy through Annual Monitoring Reports, with the findings indicating success in protecting and enhancing the environment and landscape with the various improvements to sites suggesting that the policy has been effective and continues to be appropriate. However, through the review, it will be necessary to ensure that this policy continues to be suitable for its purpose following developments within Policy and Legislation, as well as National, Regional and

Local Context where this policy may need to be amended slightly in order to reflect the current guidance and context.

Policy (DP23: Touring and Camping Sites)

7.67 No major implications have arisen by assessing this policy through Annual Monitoring Reports, with the findings indicating success in protecting and enhancing the environment and landscape with the various improvements to sites suggesting that the policy has been effective and continues to be appropriate. However, through the review, it will be necessary to ensure that this policy continues to be suitable for its purpose following developments within Policy and Legislation, as well as National, Regional and Local Context where this policy may need to be amended slightly in order to reflect the current guidance and context.

Policy (DP29: Alternative Holiday Accommodation)

7.68 With the indicator within the past three Annual Monitoring Reports measuring the effectiveness of the recently adopted policy within the current Eryri LDP, Development Policy 29: Alternative Holiday Accommodation, reporting of consistent number of small-scale developments for alternative accommodation permitted over the last three monitoring periods (average 4 applications a year). It can therefore be suggested that Development Policy 29 is implemented effectively. However, through the review, it will be necessary to ensure that this policy continues to be suitable for its purpose following developments within Policy and Legislation, as well as National, Regional and Local Context where this policy may need to be amended slightly in order to reflect the current guidance and context.

Promoting Accessibility and Inclusion

Telecommunications

Policies (DP26)

7.69 A new SPG regarding telecommunications developments was adopted to provide guidance to assist developers submitting planning and prior approval applications and in order to provide an answer to the increasing demand and applications for Telecommunications developments that the National Park has seen in recent years, mainly this monitoring period (and is likely to remain high for the next monitoring period). This is due to a campaign to improve the connectivity in rural areas within the UK which comes under the Shared Rural Network scheme. Throughout the UK (on behalf of EE, O2, Three and Vodafone) the project aims to provide coverage to an additional 280,000 premises and for an additional 16,000km of road. It is also aimed to improve geographic coverage within UK National Parks, from the current levels of 41%, to 74%. This ultimately results in applications being brought forward and submitted within Snowdonia National Park and the SPG will help provide guidance to ensure that the developments are in the best locations possible and to avoid any adverse effects on the landscape, whilst also securing economic and social need. This may also provide some implications for the plan review, and the review of the telecommunications policy.

Accessibility and Transport

(Policies SP L, DP 25)

- 7.70 The delivery of the Wyddfa and Ogwen Transport and Parking Review (Higget report) will be dependant of political and financial aspect from the various bodies and stakeholders. The sustainable transport principle and approach aligns with National Policy and strategies, and can assist in policy formulation when reviewing the LDP.
- 7.71 The issues seen within the National Park with traffic and visitor parking numbers presents significant challenges in terms of how policy can actively reduce carbon. Policies will need to consider how they can contribute to offset or reduce carbon, and link with SNPA's proposed pathway to net zero. The policy should be reviewed to be in accordance with updated National transport guidance and principles, with promotion of ultra low emission cars and active travel key areas. Local active travel initiatives could feed into the policy and be safeguarded or promoted.

8 NEW OR UPDATED EVIDENCE BASE REQUIREMENTS

8.1 Following the Review of topic areas the following evidence base requirements, identifying the need for new and updated evidence.

Background Papers and assessments to be updated as part of the LDP Revision

Agriculture, Farm Diversification and the Rural Economy Background Paper

Employment Land Review Background Paper (The joint study between Eryri National Park, Ynys Mon County Council and Gwynedd Council will form a large part of this)

Town Centre Assessment Energy Background Paper

Renewable Energy Assessment Background Paper

Landscape Background Paper

Coastal and Marine Background Paper

Minerals Background Paper

Waste Background Paper

Open Space Assessment Background Paper

The Historic Environment Background Paper

Housing Background Paper

Transport and Networks Background Paper

Tourism Background Paper

Further evidence required:

Green Infrastructure Assessment

Settlement Assessment

Town Centre Assessment

LHMA Gwynedd a Conwy

Viability Study

Employment Land Review

Potential further evidence to be considered:

Phosphate matters

Strategic Flood Consequence Assessment

Decarbonisation work

Welsh Language implications

Growth Options

Telecommunications

Background paper on the de-commissioning work at Trawsfynydd

Supplementary Planning Guidance to be updated following LDP Revision:

Supplementary Planning Guidance 4 – Affordable Housing

Supplementary Planning Guidance 6 – Nature Conservation and Biodiversity

Supplementary Planning Guidance 8: Visitor Accommodation

Supplementary Planning Guidance 9: Farm Diversification

Supplementary Planning Guidance 10 – Renewable and Low Carbon Energy

Supplementary Planning Guidance 14 – Obtrusive Lighting (Light Pollution)

9 RECONSIDERATION OF THE SA/SEA AND HRA

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 9.1 The Finalised Strategic Environmental Assessment and Sustainability Appraisal (2019), undertaken as part of the Eryri Local Development Plan Review, provides an outline monitoring framework and advice for monitoring the significant effects of implementing the LDP. This is used to;
- Determine the performance of the plan and its contribution to objectives and targets
 - Identify the performance of mitigation measures
 - Fill data gaps identified earlier in the SA process
 - Identify undesirable sustainability effects
 - Confirm whether sustainability predictions were accurate
- 9.2 Welsh Government's Development Plans Manual (2020) requires monitoring frameworks to focus on the 'significant environmental effects' of implementing a Local Development Plan, with the key purpose of identifying unforeseen adverse effects and, if necessary, to identify and take appropriate remedial action. The LDP regulations require Local Planning Authorities to produce Annual Monitoring Reports which allows for the SA monitoring framework to be integrated to the plan monitoring. The collation of monitoring data provides an opportunity to update baseline information and will provide a useful source of baseline information to inform plan review and subsequent plan revisions or replacements.
- 9.3 In terms of reviewing a Local Development Plan, Welsh Government's Development Plans Manual (2020) notes that the starting point is to update the baseline situation.
- 9.4 An analysis has been undertaken on how the Plan is contributing to the Sustainability Appraisal. This was included as Appendix in the 2022 ELDP Annual Monitoring Report. and included as appendix 3 in this Review Report. It is considered that no substantial issues of concern have arisen during the monitoring period to materially change the Sustainability Appraisal.
- 9.5 The Eryri LDP's Sustainability Appraisal, including Strategic Environmental Assessment, and Habitat Regulations Assessment, together with other impact assessments, will need to be reviewed.
- 9.6 The Authority will also need to consider other impact assessment such as the Well-being of Future Generations Act (2015), Equalities Act, Welsh Language Impact Assessment, Health Impact Assessment. Consideration will need to be given into whether the Authority uses an integrated assessment approach which would integrate all the statutory elements into a single Integrated Sustainability Appraisal or whether it undertakes individual impact assessments to cover each element.

Habitats Regulations Assessment (HRA)

- 9.7 The adopted Eryri Local Development Plan (2016-2031) was subject to a Habitats Regulation Assessment to assess whether its implementation would have any impact on any European sites of nature conservation importance (such as SAC, SPA). This involved screening all LDP Policies and proposals and a detailed assessment of likely impacts.

- 9.8 Due to Brexit, SACs and SPAs in the UK no longer form part of the European Union's Natura 2000 ecological network. A National Site Network has been created in the UK, which includes SACs and SPAs. RAMSAR sites (designated under the RAMSAR convention on Wetlands of International Importance) do not form part of the National Site Network and are not subject to the Habitats Regulations, however they are treated within the planning system in the same way as SACs and SPAs.
- 9.9 The revised/replacement LDP will also be subject to a HRA, and this will require the HRA screening process and methodology to be reviewed and revisited and applied to developing LDP proposals to ensure that the relevant legislation and regulations are complied with and any issues are fully addressed.

10 OPPORTUNITIES FOR COLLABORATIVE WORKING

- 10.1 There are many opportunities for neighbouring planning Authorities to collaborate when revising their LDP. The Eryri National Park Authority has considered the opportunity of working with adjoining authorities to prepare a joint Local Development Plan. Conwy County Borough Council have already started to revise their LDP and have prepared their Preferred Strategy and are expected to consult on the revised deposit LDP in early 2023. The timing is therefore not compatible with the Eryri LDP revision. NPA Officers are kept up to date with progress in Conwy and will continue to collaborate on the evidence gathered as part of plan preparation.
- 10.2 The other potential partner would be Gwynedd Council as the timing for preparing the replacement Plan is similar to the National Park Authority's. In 2010, Gwynedd Council and the Isle of Anglesey County Council agreed to establish joint working arrangements which resulted in creating a Joint Planning Policy Service to prepare a Joint Local Development Plan for both LPA's and establish a Joint Planning Policy Committee (JPPC) as a cross-border decision-making body. Gwynedd and Anglesey is the only joint development plan that has been prepared in Wales. Following a review of joint working arrangements in 2017 the joint working arrangements continued. Gwynedd and Anglesey Council's draft Review Report was consulted upon in November 2021 and agreed by full Council in March 2022. The joint working arrangements between Gwynedd and Anglesey for the Joint Planning Policy Service (GPCC) continued until in July 2022. A decision was made by Gwynedd Council's Cabinet and Ynys Mon County Council's Executive Committee, to proceed with a process to end the existing collaboration arrangement and establish new planning policy teams for both Councils. Although the arrangement has terminated and both Councils are moving forward to prepare separate Plans where opportunities arise to prepare or commission joint pieces of work this will be considered. It is not considered feasible for the Authority to create a Joint Planning Policy Unit with Gwynedd and Anglesey to carry out the planning policy functions and establish a cross-border decision-making body as it could result in delay when there is a need to progress as soon as possible with the review in order to respond to current issues and considerations. There are also policy variation stemming from strategic growth / restraint objectives and the need to reflect National Park purposes and ensure that the Special Qualities of the National Park are given due consideration. Eryri is a much more rural area with a much smaller population base and generally smaller scale of consultation responses than would be the case for the Council's Local Development Plan.
- 10.3 The above does not preclude working jointly, where the opportunity arises, on gathering evidence and basing policies on this information and ensuring that the revised Eryri LDP is compatible with neighbouring authorities' LDPs'. Opportunities to undertake joint studies/evidence base development has already started with Gwynedd and Anglesey with a joint updated Strategic Flood Consequence Assessment as well as discussions on commissioning a joint Employment Land Review.
- 10.4 It will also be important to consider the functional linkages and interdependencies of the communities in the National Park area and in the Gwynedd, Conwy and Powys local planning areas. It will be important to consider areas outside of the National Park and their influence on National Park communities in providing many essential services and facilities. It is also important to continue to collaborate with neighbouring authorities on issues faced in shared settlements that straddle the National Park boundary.
- 10.5 Eryri National Park sits within the North Wales region, as identified within Future Wales. Future Wales expects the North Wales planning authorities to work together to plan for

regional issues in preparation of a Strategic Development Plan. It is envisaged that the process of preparing a SDP will result in regional collaboration to ensure that there is coherence between the Local Development Plan and the Strategic Development Plan in terms of strategy and vision for the local area and regionally. The North Wales CJC was established on 1st April 2021 and Eryri NPA is already supporting and contributing towards the set up cost. It is anticipated that there will be further opportunities to undertake certain evidence on a joint basis to ensure consistency in approach to aid with future policy development at a regional and local level. Work on the North Wales SDP is scheduled to commence during Summer 2023 and it is anticipated that the progress from commencement to adoption could take up to 5 years.

11 CONCLUSION

- 11.1 The 3rd Annual Monitoring Report (2022) has highlighted that the Eryri LDP housing requirement figures are not being delivered. The housing requirement will need to be re-considered to reflect the future needs of the Plan area. The distribution of the housing requirement through the Spatial Development Strategy will, therefore, also need to be reconsidered.
- 11.2 Significant changes have occurred in the planning policy context particularly at a national level with the publication of Future Wales and updated editions of Planning Policy Wales. The LDP will need to be revised to reflect the emphasis within these documents on the principles of placemaking and sustainable development, including the National Sustainable Placemaking Outcomes.
- 11.3 The environmental, social and economic impacts of the coronavirus have had far reaching consequences and raise significant issues for future policy making in Eryri. The pandemic has highlighted the importance of health and well-being, access to services, economic resilience, digital connectivity and the value of the natural environment. We've seen a renewed value placed on the provision of local services, local food chains, and local quality green space. The LDP review will need to ensure that people are able to live locally and that communities become more sustainable and resilient into the future. The LPA must also meet other duties and responsibilities, including those relating to the climate and nature emergencies.
- 11.4 Changes will also be needed to individual policies to reflect the re-consideration of the strategy and to reflect updated national policy and guidance and relevant evidence. The revisions proposed in this Review Report are not considered to be definitive and further consideration will be given to the need to revise other LDP policies during Eryri LDP revision process to reflect changes in guidance and updated evidence.
- 11.5 The Eryri LDP's evidence base will need to be updated in line with the latest requirements of national planning policy and guidance to ensure an up to date and robust evidence base to inform the strategy, policies and proposals of the Replacement Eryri LDP.
- 11.6 The LDP's Sustainability Appraisal, including Strategic Environmental Assessment, and Habitat Regulations Assessment, together with other impact assessments, will need to be reviewed.
- 11.7 The Authority will continue to work collaboratively with other LPA's and explore further opportunities to undertake certain evidence on a joint basis to ensure consistency in approach to aid with future policy development at a regional and local level.
- 11.8 To conclude, based on the LPA's review of the LDP, it is considered that the Full Revision procedure is the most appropriate form of revision for the Eryri LDP. Due to the significance of the changes identified the Short Form Revision procedure which is much more focused and limited in scope could not be justified and is not considered appropriate.

APPENDIX 1: KEY STAKEHOLDERS

Specific Consultation Bodies

The Welsh Government

The Planning Inspectorate

Natural Resources Wales

Network Rail Infrastructure Limited

Secretary of State for Transport

Adjacent Local Planning Authorities

Gwynedd Council

Conwy Council

Ceredigion Council

Powys Council

Denbighshire Council

Community and Town Councils

Any person to whom the electronic communications code applies

CTIL (on behalf of Vodafone and telephonica)

MBNL (EE and Three)

BT

Any Person who own or controls electronic apparatus

Arqiva

Local Health Board

Betsi Cadwaladr

Electricity

SP energy Networks & Wales and West Utilities

National Grid

Gas

National Grid

Sewerage Undertaker

Welsh Water

United utilities

Water Undertaker

Welsh Water

Severn Trent Water

UK Government Departments

Department for Climate and Energy Change

MOD

General Consultation Bodies

Voluntary bodies, some or all of whose activities benefit any part of the Authority's area

Snowdonia Society

Campaign for the protection of rural Wales

Cymdeithas Edward Llwyd

Equality groups including racial, ethnic or national groups

Equality and Human Rights Commission

North Wales Regional Equality Network

Stonewall

Different Religious groups

Bangor Islamic Centre

Wales Orthodox Mission

Cytun

Bodies which represent the interest of Disabled People

Meirionnydd Access Group

Arfon Action Group

Dwyfor Access Group

Conwy County Voluntary

Deaf Association North Wales

North Wales Society for the Blind

Disability Wales

Equality and Human Rights Commission

Groups which represent the interest of Elderly people

Age Cymru

Age Concern Gwynedd a Mon

Age Concern North Wales Central

Bodies which represent the interests of persons carrying on Business in the park

Gwynedd Economy and Regeneration

Conwy Regeneration service

Federation of Small Businesses

Menter Mon

North Wales Business Club

Bodies which represent the interests of Welsh Culture

Welsh Language Commission

Cymdeithas yr Iaith

Menter Iaith Conwy

Hunaniath

Cymuned

Urdd Gobaith Cymru

Dyfodol i'r Iaith

Cylch yr Iaith

Voluntary groups in the area

Mantell Gwynedd

Wales Council for Voluntary Action

Conwy Voluntary Services Council

Shelter Cymru

Talsarn Community first Partnership area

Local Members of Parliament and Welsh Assembly Members

Others

National Trust

National Farmers Union

Farmers Union Wales

Visit Wales

Council for National Parks

Home Builders Federation

Sports Council for Wales

One Voice Wales

North Wales Mountain Rescue Association

Cwmpas

Other consultees identified

Access, Recreation and user groups

- Snowdonia Access Fora (Northern and Southern)
- British Mountaineering Council
- Snowdonia mountain user groups
- Plas y Brenin
- Ramblers Association
- Cyclist Touring Club
- Fields in Trust
- Snowdonia Active

Public Services

- North Wales Police
- Fire services

Wildlife and landscape conservation

- North Wales Wildlife Trust
- Royal Society for the Protection of Birds
- Woodland Trust
- British Trust for Conservation Volunteers
- Cymdeithas Ted Breeze

Tourism

- Small serviced Accommodation Forum for Wales
- Association of Welsh agents
- Wales Tourism Alliance
- Mid Wales Tourism
- North Wales Tourism
- British Holiday and Home Parks Association Ltd
- Betws y Coed and District Tourism Association
- Caravan and Camping Club
- Operators of tourist railway lines in North Wales
- The Caravan Club
- National Caravan Council

Cultural Heritage

- Arts Council for Wales
- Yr Academi Gymreig
- Conwy Valley Civic Society
- Merched y Wawr
- Cymdeithas Eisteddfodau Cymru

- Cymdeithas Llafar Gwlad
- Cyfeillion Tan y Bwlch
- Cymdeithas Hanes Amaethyddiaeth
- Gwynedd Archaeological Trust

Agriculture and forestry

- Royal Forestry Society
- Coed Cymru
- Fountain Forestry
- Flintshire/Scottish Woodlands
- Pryor and Ricketts Siviculture

Education

- Local primary and Secondary Schools
- Local Colleges of further education

Business

- North Wales Economic Ambition Board

Housing Local Partnerships

- North Wales Rural Housing Enabler Service
- Grwp Cynefin
- North Wales Housing
- Adra
- Cartrefi Conwy
- The Gypsy Council

Local partnerships

- Partneriaeth Dolgellau / Treftadaeth Dolgellau

Community groups

- Local Community Groups

Voluntary Sector

- Seren Ffestiniog Cyf.
- Antur Waunfawr
- Dyffryn Nantlle 20:20

Sustainable development

- Centre for Alternative Technology
- Ecodyfi
- WRAP
- Conwy Cynhaliol

National Park Authority

- SNPA managers and sections heads

Energy

- NDA
- Magnox

Public Transport

- Green Key Partnership
- Lloyds Coaches
- Arriva

Land Owners

- Country Landowners Association
- Crown Estate Commissioners

Others

- Design Commission for Wales

- Health and Safety Executive
- Post Office Property Holdings
- Young Farmers
- Local News Papers
- Papurau Bro
- Mosaic
- North Wales Chinese Society

APPENDIX 2: PROGRESS ON ALLOCATED HOUSING SITES

Allocations	Units Proposed	Monitoring Progress (pre-app discussions / planning permission / completion)
Land behind the Red Lion, Y Bala (80% open market, 20% affordable housing to meet local need). Release of 30 units up to 2016 and, if built, the remaining 25 units from 2016 to 2022	55	Contact from landowner in 2021 confirmed the intention to sell the site to a developer. No further contact was received in 2022. Comments have been received from Dwr Cymru that the capacity available at Bala Wastewater Treatment Works (WwTW) to accept further growth is limited and that a capital scheme for upgrading Bala WwTW is under consideration. The required infrastructure improvements could also be progressed by way of developer contributions made via a S106 Agreement. Formal pre-application enquiry submitted to the Authority (January 2019) outlining site layout and proposed plans.
Land at Cysgod y Coleg, Y Bala (100% affordable housing to meet local need)	10	30 units completed 2012-13. Planning permission granted in June 2020 for the construction of 9 affordable dwellings (3 two bedroomed bungalows and 6 two bed houses). Works have commenced on site. (Site completed and occupied during the 2022-23 monitoring period)
Land adjacent to Pentre Uchaf, Dyffryn Ardudwy (100% affordable housing to meet local need)	10	The Rural Housing Enabler has undertaken a needs survey for Dyffryn Ardudwy. The landowner, Adra, submitted a pre-app during 2021-22. Constraints from flood zones and protected species may limited development of the site to 2-3 units. A need for units for large families has been identified.
Land adjacent to Capel Horeb, Dyffryn Ardudwy (50% open market, 50% affordable housing to meet local need)	5	Planning permission has been refused for two open market dwellings on the site as it did not comply with the ELDP affordable housing policy.
Former Primary School, Aberdyfi (100% affordable housing to meet local need).	6	Planning permission has been granted for 11 units on site which includes 4 flats. Work completed and the units are occupied.
Llanfrothen (100% affordable housing to meet local need)	6	This is a new allocation within the ELDP 2016-31. Adra foresee the site being completed by 2027/28. A housing needs survey has been undertaken by the Rural Housing Enabler. Additional costs relating to excavations and drainage have been identified. A planning application for 8 affordable units was submitted in November 2022.
Dolgellau (100% affordable housing to meet local need)	15	This is a new allocation within the ELDP 2016-31. The landowner, foresee the site being completed by 2026/27 A housing needs survey has been undertaken by the Rural Housing Enabler. Additional costs relating to excavations and drainage have been identified.

Llanuwchllyn (100% affordable housing to meet local need)	7	Land in the ownership of Grwp Cynefin Housing Association. They foresee the site being completed by 2030/31.
Land adjacent to Lawnt y Plas, Dinas Mawddy (100% affordable housing to meet local need)	6	This is a new allocation within the ELDP 2016-31. Site owned by Adra. They foresee the site being completed by 2030/31.
Trefriw, land next to Ty Capel Peniel (50% open market, 50% affordable housing to meet local need)	5	Owner stated an intention to develop within 5 years from the submission of the candidate site. No contact received from owner since 2016.
Dolwyddelan (100% affordable housing to meet local need)	6	This is a new allocation within the ELDP 2016-31. Intention to develop site following internal consultations by owner, Natural Resources Wales.
Land adjacent to Penyrhwylfa, Harlech (67% open market, 33% affordable housing for local need)	24	This is a new allocation within the ELDP 2016-31. The landowner has stated that 12 units are foreseen to be completed by 2025. A housing needs survey has been undertaken by the Rural Housing Enabler
Llanegryn (50% open market, 50% affordable housing to meet local need)	8	Landowner has been in discussion with the Rural Housing Enabler who have completed a Housing Needs Survey for the community.
Land adjacent to Bryn Deiliog, Llanbedr, (100% to meet local need)	6	This is a new allocation within the ELDP 2016-31. The site is foreseen by the landowner, Adra, to be completed by 2028/29.
Land adjacent to Bro Prysor, Trawsfynydd, (100% to meet local need)	10	This is a new allocation within the ELDP 2016-31. The site is foreseen by the landowner, Adra, to be completed by 2029/30. A housing needs survey has been undertaken by the Rural Housing Enabler
Land adjacent to Maesteg, Pennal (100% affordable housing to meet local need)	5	This is a new allocation within the ELDP 2016-31. The site is foreseen by the landowner, Adra, to be completed by 2022/23. Rural Housing Enabler has completed a housing needs survey. A planning application was submitted during 2021/22 for 5 units; permission awaits the signing of a S.106 agreement.
Total	184	

APPENDIX 3: SUSTAINABILITY APPRAISAL MONITORING (SA)

	SA Objective	Monitoring Indica	Data Source	Analysis
1	Manage the effects of climate change through mitigation and adaptation	Ratio of renewable energy (solar, domestic wind and hydro) project planning permissions granted against planning applications per year.	SNPA	<p>2018/2019 Of all the planning permissions granted during this period, 4% have been for Hydro. 1% for Solar, 1% for other renewable energy schemes. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications. Of the 29 applications received for renewable energy schemes the Authority granted permission for 26.</p> <p>2019/2020 Of all the planning permissions granted during this period, 0% have been for Hydro. 0% for Solar, 0% for other renewable energy schemes. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications. The Authority granted all 3 applications received for 'other' renewable energy schemes. These included an air-source heat pump, and two biomass boilers.</p> <p>2020/21 Of all the planning permissions granted during this period, 0% have been for Hydro. 0% for Solar, 1% for other renewable energy schemes. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications. The Authority granted all 3 applications received for 'other' renewable energy schemes. These included an air-source heat pump, a biomass boiler and a conversion to accommodate a biomass boiler.</p> <p>2021/22 Of all the planning permissions granted during this period, 0% have been for Hydro. 0% for Solar, 1% for other renewable energy schemes. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications. The Authority granted all 4 applications received for 'other' renewable energy schemes. These included three air-source heat pumps, and one biomass boiler.</p>
2	Ensure that the location and design of new development is acceptable in terms of the potential	Number of planning permissions contrary to NRW advice on flooding.	NRW	<p>2018/2019 During this monitoring period, No planning applications were permitted contrary to NRW advice on flooding.</p> <p>2019/2020 During this monitoring period, no planning applications were permitted contrary to NRW advice on flooding.</p> <p>2020/2021 During this monitoring period, no planning applications were permitted contrary to NRW advice on flooding</p> <p>2021/2022 During this monitoring period, no planning applications were permitted contrary to NRW advice on flooding.</p>

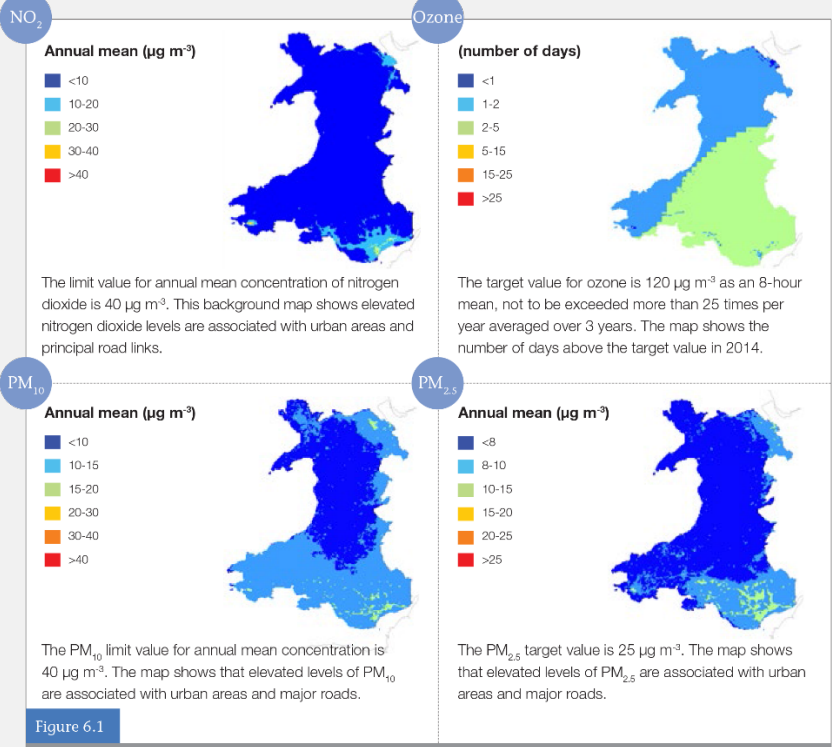
	consequences of flooding	Number of new developments incorporating SuDS as a ratio of total planning permissions granted.	SNPA	<p>2018/2019 From 7th January 2019, all new developments of more than one dwelling house or where the construction area is 100m² or more, will require Sustainable Drainage Systems (SuDS) for surface water. SuDS on new developments must be designed and built in accordance with the Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SAB role, before construction work begins. The application permitted for the demolition of the former Aberdyfi primary school and construction of 11 dwellings with new access road and parking submitted a drainage strategy that complies with the relevant legislation of TAN 15, SuDS hierarchy and Approved Document H of the Building Regulations 2010.</p> <p>2019/2020 From 7th January 2019, all new developments of more than one dwelling house or where the construction area is 100m² or more, will require Sustainable Drainage Systems (SuDS) for surface water. SuDS on new developments must be designed and built in accordance with the Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SAB role, before construction work begins.</p> <p>2020/2021 From 7th January 2019, all new developments of more than one dwelling house or where the construction area is 100m² or more, will require Sustainable Drainage Systems (SuDS) for surface water. SuDS on new developments must be designed and built in accordance with the Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SAB role, before construction work begins.</p> <p>2021/2022 From 7th January 2019, all new developments of more than one dwelling house or where the construction area is 100m² or more, will require Sustainable Drainage Systems (SuDS) for surface water. SuDS on new developments must be designed and built in accordance with the Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SAB role, before construction work begins.</p>
3	Promote the use of sustainable locally sourced material including energy	Number and type of renewable energy schemes with planning permission per annum.	SNPA	<p>2018/2019 Of the 29 applications received for renewable energy schemes between 2018 and 2019, the Authority granted permission for 26. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications.</p> <p>2019/2020 Of the 9 applications received for renewable energy schemes between 2019 and 2020, the Authority granted permission for 9. 3 applications were for new renewable energy schemes whilst 6 applications were for alterations to existing schemes. Through</p>

				<p>planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications.</p> <p>2020/2021 Of the 5 applications recieved for renewable energy schemes between 2020 and 2021, the authority granted permission for 4. One application for a 600kw Hydro Electric Scheme was withdrawn. Those granted permission included a solar panel array, biomass boiler and an air source heat pump. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications.</p> <p>2021/2022 Of the 5 applications recieved for renewable energy schemes between 2021 and 2022, the authority granted permission for 5. Those granted permission included a biomass boiler, two air source heat pumps and a re-routing of a penstock on a hydro-electric scheme. Through planning policies in the LDP, the Authority supports small-scale domestic renewable energy applications.</p>
		Number of developments granted planning permission achieving green design awards, as a percentage of the total number of planning applications granted each year.	SNPA	<p>2018/2019 This is not an indicator that can be monitored easily by the Authority. The Authority will report on any green design awards it becomes aware of.</p> <p>2019/2020 This is not an indicator that can be monitored easily by the Authority. The Authority will report on any green design awards it becomes aware of.</p> <p>2020/2021 This is not an indicator that can be monitored easily by the Authority. The Authority will report on any green design awards it becomes aware of.</p> <p>2021/2022 No new information.</p>
4	Promote the use of sustainable transport modes and reduce the impact of cars, road freight and infrastructure	Distance of new developments from a public transport service.	SNPA	<p>2018/2019 53 out of 111 new developments were located within 0.5km of a bus stop, while 93 out of 111 were located within 1.5km of a bus stop. 29 out of 111 were also located within 1.5km of a Rail Station.</p> <p>2019/2020 69 out of 107 new developments were located within 0.5km of a bus stop, while 93 out of 107 were located within 1.5km of a bus stop. 39 out of 107 were also located within 1.5km of a Rail Station.</p> <p>2020/2021 60 out of 99 new developments were located within 0.5km of a bus stop, while 87 of 99 were located within 1.5km of a bus stop.39 out of 99 were also located within 1.5km of a train station.</p> <p>2021/2022 30 out of 64 new developments were located within 0.5km of a bus stop, while 52 of 64 were located within 1.5km of a bus stop. 19 out of 64 were also located within 1.5km of a train station.</p> <p>2018/2019 No change</p>

		Journey to work by mode	Census	<p>2019/2020 This information is not yet available for the National Park from the 2011 census. This data would need to be commissioned in order to fit the Park boundaries which is something the Authority might have to consider.</p> <p>2020/2021 No new information</p> <p>2021/2022 No new information</p>		
		Average distance travelled to work	Census	<p>2018/2019 No change</p> <p>2019/2020 This information is not yet available for the National Park from the 2011 census. This data would need to be commissioned in order to fit the Park boundaries which is something the Authority might have to consider.</p> <p>2020/2021 No new information</p> <p>2021/2022 No new information</p>		
		Number of bus services running in the National Park	SNPA, Gwynedd, Conwy	<p>2018/2019 According to the Gwynedd and Conwy Council bus timetables, there are currently 32 bus services running through the National Park (duplication has been avoided so that the same journeys running through Gwynedd and Conwy have only been counted once). There are four bus services from the figure noted which are run by 'Snowdon Sherpa', which are only available during the Summer. There are also two train services which serve some towns and areas within the Park, which are the Cambrian Coast and the Conwy Valley railway lines.</p> <p>2019/2020 No change</p> <p>2020/2021 No change</p> <p>2021/2022 No change</p>		
		5	Protect and enhance landscape character and quality	Quantity of Outstanding and High value landscape as defined under LANDMAP's five aspects: cultural, geological, landscape habitat and visual and sensory.	SNPA CCW	<p>2018/2019 The results for the areas defined under LANDMAP are as follows;</p> <ul style="list-style-type: none"> Visual and Sensory - 54.8% (63 out of 115 areas) of visual areas within the National Park were classed as High or Outstanding Cultural - 96.0% (48 out of 50 areas) of cultural areas within the National Park were classed as High or Outstanding Geological - 93.9% (107 out of 114 areas) of geological areas within the National Park were classed as High or Outstanding Historical - 89.3% (134 out of 150 areas) of historical areas within the National Park were classed as High or Outstanding Landscape Habitats- 38.9% (145 out of 373 areas) of landscape areas within the National Park were classed as High or Outstanding
						2019/2020 No change
						2020/2021 No change
						2021/2022 No change
				Number of planning applications granted permission in areas	LANDMAP	<p>2018/2019 The number of new planning applications for the areas defined under LANDMAP are as follows;</p> <ul style="list-style-type: none"> Visual and Sensory - 62 in High and 6 in Outstanding areas

		of outstanding and high value as defined by LANDMAP.		<ul style="list-style-type: none"> • Cultural - 46 in High and 63 in Outstanding areas • Geological - 13 in High and 91 in Outstanding areas • Historical - 54 in High and 49 in Outstanding areas • Landscape Habitats - 27 in High and 26 in Outstanding areas <p>2019/2020 The number of new planning applications for the areas defined under LANDMAP are as follows;</p> <ul style="list-style-type: none"> • Visual and Sensory - 44 in High and 6 in Outstanding areas • Cultural - 44 in High and 50 in Outstanding areas • Geological - 6 in High and 107 in Outstanding areas • Historical - 31 in High and 51 in Outstanding areas • Landscape Habitats - 10 in High and 27 in Outstanding areas <p>2020/2021 The number of new planning applications for the areas defined under LANDMAP are as follows;</p> <ul style="list-style-type: none"> • Visual and Sensory - 44 in High and 0 in Outstanding areas • Cultural - 30 in High and 51 in Outstanding areas • Geological – 15 in High and 67 in Outstanding areas • Historical - 34 in High and 51 in Outstanding areas • Landscape Habitats - 11 in High and 16 in Outstanding areas <p>2021/2022 The number of new planning applications for the areas defined under LANDMAP are as follows;</p> <ul style="list-style-type: none"> • Visual and Sensory - 151 in High and 16 in Outstanding areas • Cultural - 117 in High and 157 in Outstanding areas • Geological – 35 in High and 244 in Outstanding areas
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				<ul style="list-style-type: none"> • Historical - 115 in High and 118 in Outstanding areas • Landscape Habitats - 28 in High and 33 in Outstanding areas
		Extent of tranquil areas in the National Park	SNPA	2018/2019 No change. However, the Authority is currently working on re-evaluating and re-mapping the tranquil areas of the National Park.
				2019/2020 No change. However, the Authority is currently working on re-evaluating and re-mapping the tranquil areas of the National Park.
				2020/2021 No change
				2021/2022 No change
6			Gwynedd and Conwy Councils	2018/2019 No new information.

	<p>Protect and enhance air quality</p>	<p>Air pollutant levels in the National Park – based upon Air Quality Review and Assessments for Gwynedd and Conwy.</p>		<p>2019/2020 Due to its geographical location on the periphery of north-west Europe and the south-westerly prevailing winds that are experienced for most of the year, the air quality in Snowdonia is generally very good. Occasionally, however, in stable weather conditions with high pressure over the UK, eastern winds can bring pollutants from more industrialized areas, and the levels of some pollutants can go up as a result.</p>  <p>2020/2021 No new information</p> <p>2021/2022 No new information.</p> <p>2018/2019 No change.</p> <p>2019/2020 While this is not monitored by the Authority, there are very few contaminated sites within the National Park. If a site that required remediation came forward as an application, it would be flagged up. No applications requiring remediation have been granted planning permission during the period of this AMR.</p>
7	<p>Conserve the quality of soils through reducing contamination</p>	<p>Number of planning applications which include site remediation and the</p>	<p>SNPA</p>	<p>2018/2019 No change.</p> <p>2019/2020 While this is not monitored by the Authority, there are very few contaminated sites within the National Park. If a site that required remediation came forward as an application, it would be flagged up. No applications requiring remediation have been granted planning permission during the period of this AMR.</p>

	and protecting soil function	area of land remediated.		<p>2020/2021 No new information.</p> <p>2021/2022 No new information.</p>
		Percentage of new developments granted planning permission on previously developed land.		<p>2018/2019 The number of new housing units granted permission on previously developed land during the period of this AMR is 24/40 that is 60%.</p> <p>2019/2020 The number of new housing units granted permission on previously developed land during the period of this AMR is 5/14 that is 36%.</p> <p>2020/2021 The number of new housing units granted permission on previously developed land during the period of this AMR is 16/34 that is 47%.</p> <p>2021/2022 The number of new housing units granted permission on previously developed land during the period of this AMR is 9/9 that is 100%.</p>
8	Safeguard National Park geology and geomorphology	The condition of RIGS in the National Park.		<p>2018/2019 No change.</p> <p>2019/2020 RIGS were designated as Regionally Important Geological/Geomorphological Sites in the UK Nature Conservancy “Earth Science Conservation in Great Britain: A Strategy” (1990), being of a standard worthy of recognition and protection as non-statutory sites, to complement the SSSIs and NNRs under statutory protection. RIGS sites in Wales are now known as Regional Geodiversity Sites.</p> <p>Natural Resources Wales have contributed to the all Wales audit of RIGS through financial and technical support. The audit which began in 2003, is the first comprehensive national assessment of second-tier sites in Wales. It was undertaken largely by the local RIGS groups and NRW Earth Scientists with the majority of the funding coming from the Aggregates Levy Sustainability Fund, but with a financial contribution by NRW to the project in North Wales. The audit led to the standardisation of the site documentation, digitisation of site boundaries to a common format and ensured that the landowners and planning authorities were informed of the RIGS.</p> <p>A major input from NRW was the development of the GIS database for the project where all of the 600 or so sites registered so far were digitised by NRW. NRW currently hosts these GIS data.</p> <p>There are currently 47 RIGS in the National Park.</p> <p>2020/2021 No change.</p> <p>2021/2022 No change.</p>
9a	Protect and enhance biodiversity	Condition of Designated sites including SPAs, SACs, Ramsar, SSSI, NNR, LNR.	SNPA NRW	<p>2018/2019</p> <p>Information received from Natural Resources Wales indicate the following.</p> <p>SAC</p> <ul style="list-style-type: none"> No sites / units are under appropriate conservation management in the National Park for 2018-2019 572 units (100%) are defined as needing action No sites / units need more research to base decisions

				<p>SPA</p> <ul style="list-style-type: none"> No sites / units are under appropriate conservation management 162 units (100.0%) are defined as needing action No sites / units need more research to base decisions <p>SSSI</p> <ul style="list-style-type: none"> 143 units (17%) are under appropriate conservation management 693 units (82.60%) are defined as needing action 3 units (0.4%) need more research to base decisions <p>RAMSAR</p> <ul style="list-style-type: none"> 2 units (100%) are defined as needing action
				2019/2020 This information was not received by NRW for this monitoring period.
				2020/2021 This information was not received by NRW for this monitoring period.
				2021/2022 This information was not received by NRW for this monitoring period.
9b	Protect and enhance biodiversity	Condition and status of LBAP species and habitats.		<p>2018/2019 No new information, however the development of the new ERAMMP (The Environment & Rural Affairs Monitoring and Modelling Programme) will provide a future mechanism to measure and monitor against its baseline.</p> <p>2019/2020 No new information.</p> <p>2020/2021 No new information.</p> <p>2021/2022 No new information.</p>
9c	Protect and enhance biodiversity	Number of planning permissions affecting LBAP species and habitats		<p>2018/2019 No new information, however the development of the new ERAMMP monitoring program will provide a future mechanism to measure and monitor against its baseline.</p> <p>2019/2020 No new information.</p> <p>2020/2021 No New information.</p> <p>2021/2022 No New information.</p>
9d	Protect and enhance biodiversity	Number of planning applications resulting in the loss of hedgerows and field boundaries (where this occurs the length of loss of details about species should be collated).		<p>2018/2019</p> <p>Hedge planting schemes – 39 schemes resulted in 11,308 metres of 79,156 hedgerows being planted. There has been an increase in the number of hedge planting schemes due to the increase in the source of funding for this work, such as Sustainable Management Scheme (SMS) Eden Grants, Young Farmers SMS, Woodland Park Scheme, National Grid Maentwrog West Landscape Enhancement Initiative (LEI), National Grid Maentwrog East LEI, and National Grid Traditional Boundaries LEI.</p> <p>Planted woodlands – 2.81ha of 4,496 woodland re-planted after 16 schemes.</p>
10a			SNPA	2018/2019 No change

	Value and protect and enhance the historic environment including built heritage, archaeology and historic landscape	Condition of Conservation Areas and the extent to which new development is consistent with the Conservation Area Management Plans.	Cadw Gwynedd Archaeological	<p>2019/2020 There is only one management plan in place within the National Park currently. Developments within the Dolgellau Conservation areas are consistent with the Management Plans for the area. Work has also been carried out by Gwynedd Archaeological Trust on the remaining Conservation Areas and progress will be reported in next year's monitoring framework.</p> <p>2020/2021 No new information</p> <p>2021/2022 As the Conservation Area assessments and management plans have not yet been completed, it is difficult to determine if conservation areas have been improved by development proposals. Preserving and enhancing conservation areas has been considered as part of the decision-making process.</p>																		
10b	Value and protect and enhance the historic environment including built heritage, archaeology and historic landscape	Condition of Scheduled Ancient Monuments.	CADW	<p>2018/2019 Data provided by Cadw during June 2019 shows the following: 279 of the 377 Scheduled Monuments in the Park have been visited during the current (5th) round of visits, which started on 01/04/2011</p> <table border="1" data-bbox="1211 643 2040 759"> <thead> <tr> <th>Condition</th> <th>Number of sites</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Improved</td> <td>15</td> <td>5</td> </tr> <tr> <td>Stable</td> <td>181</td> <td>65</td> </tr> <tr> <td>Worsened</td> <td>83</td> <td>30</td> </tr> </tbody> </table> <p>Monuments at Risk levels (MaR):</p> <table border="1" data-bbox="1151 826 2112 930"> <tbody> <tr> <td>Low</td> <td>129</td> </tr> <tr> <td>Medium</td> <td>119</td> </tr> <tr> <td>High</td> <td>31 (2x High Immediate, 29x High)</td> </tr> </tbody> </table> <p>MaR levels:</p> <ul style="list-style-type: none"> • <i>High – Immediate: Active identifiable threat or threats, which are having a severe impact upon the monument, require immediate mitigation and implementation of a long-term management plan.</i> • <i>High: Active identifiable threat or threats, which are or have the potential to impact severely upon the monument, require repair and implementation of a long-term management plan</i> • <i>Medium: Active identifiable threat or threats, which are endangering the long-term preservation of the monument, require implementation of a long-term management plan.</i> • <i>Low: The monument and any threat are being managed effectively.</i> <p>The following information provides the most recent data on the condition of all monuments in the SNPA. Monuments at Risk levels for sites were not assessed during the 4th round</p>	Condition	Number of sites	%	Improved	15	5	Stable	181	65	Worsened	83	30	Low	129	Medium	119	High	31 (2x High Immediate, 29x High)
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Condition	Number of sites	%
Improved	18	5
Stable	251	67
Worsened	108	28

2019/2020 Data provided by Cadw during 2019 shows the following:

279 of the 377 Scheduled Monuments in the Park have been visited during the current (5th) round of visits, which started on 01/04/2011:

Condition	Number of sites	%
Improved	15	5
Stable	181	65
Worsened	83	30

Monuments at Risk levels (MaR):

Low	129
Medium	119
High	31 (2x High Immediate, 29x High)

MaR levels:

High – Immediate: Active identifiable threat or threats, which are having a severe impact upon the monument, require immediate mitigation and implementation of a long-term management plan.

High: Active identifiable threat or threats, which are or have the potential to impact severely upon the monument, require repair and implementation of a long-term management plan

Medium: Active identifiable threat or threats, which are endangering the long-term preservation of the monument, require implementation of a long-term management plan.

Low: The monument and any threat are being managed effectively.

The following information provides the most recent data on the condition of all monuments in the SNPA. Monuments at Risk levels for sites were not assessed during the 4th round

(2002-2011), therefore, this data is provided in relation to the "condition trend" of monuments.

Condition	Number of sites	%
Improved	18	5
Stable	251	67
Worsened	108	28

2020/2021 Data provided by Cadw during 2021 shows the following:

286 of the 377 Scheduled Monuments in the Park have been visited during the current (5th) round of visits, which started on 01/04/2011:

Condition	Number of sites	%
Improved	19	5
Stable	248	66
Worsened	110	29

Monuments at Risk levels (MaR):

Low	130
Medium	125
High	31 (2x High Immediate, 29x High)

MaR levels:

High – Immediate: Active identifiable threat or threats, which are having a severe impact upon the monument, require immediate mitigation and implementation of a long-term management plan.

High: Active identifiable threat or threats, which are or have the potential to impact severely upon the monument, require repair and implementation of a long-term management plan

				<p>Medium: Active identifiable threat or threats, which are endangering the long-term preservation of the monument, require implementation of a long-term management plan.</p> <p>Low: The monument and any threat are being managed effectively.</p> <p>The following information provides the most recent data on the condition of all monuments in the SNPA. Monuments at Risk levels for sites were not assessed during the 4th round (2002-2011), therefore, this data is provided in relation to the "condition trend" of monuments</p> <table border="1"> <thead> <tr> <th>Condition</th> <th>Number of sites</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Improved</td> <td>16</td> <td>6</td> </tr> <tr> <td>Stable</td> <td>181</td> <td>63</td> </tr> <tr> <td>Worsened</td> <td>83</td> <td>31</td> </tr> </tbody> </table> <p><u>2021/2022 Data provided by Cadw during 2021 shows the following:</u></p> <p>326 of the 377 Scheduled Monuments in the Park have been visited during the current (5th) round of visits, which started on 01/04/2011:</p> <table border="1"> <thead> <tr> <th>Condition</th> <th>Number of sites</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Improved</td> <td>17</td> <td>5</td> </tr> <tr> <td>Stable</td> <td>186</td> <td>57</td> </tr> <tr> <td>Worsened</td> <td>123</td> <td>38</td> </tr> </tbody> </table> <p>Monuments at Risk levels (MaR):</p>	Condition	Number of sites	%	Improved	16	6	Stable	181	63	Worsened	83	31	Condition	Number of sites	%	Improved	17	5	Stable	186	57	Worsened	123	38
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10c	Value and protect and enhance the historic environment including built heritage,	Number of Listed Buildings at risk	SNPA	<p>2018/2019</p> <p>Data regarding the condition of Listed Buildings in the National Park is collected regularly.</p> <ul style="list-style-type: none"> • Total number of buildings at risk (Category 1 - Extreme Risk) = 51 • Total number of buildings at risk (Category 2 - Grave Risk) = 52 • Total number of buildings at risk (Category 3 - At Risk) = 200 • Total number of buildings at risk (Category 4 - To be watched) = 321 																		

	archaeology and historic landscape			<p>2019/2020 Due to the lack of resources and COVID-19 circumstances, there is no update for the number of listed buildings at risk for this monitoring period.</p> <p>2020/2021 Due to the lack of resources and COVID-19 circumstances, there is no update for the number of listed buildings at risk for this monitoring period.</p> <p>2021/2022 No new information..</p>
12	Conserve, promote and enhance Snowdonia's cultural heritage and the Welsh language	Percentage of Welsh speakers in the National Park and their distribution	SNPA and Census	<p>2018/2019 Census information, so no annual update available.</p> <p>2019/2020 Census information, so no annual update available. However, the information displayed below is taken from the 2011 Census;</p> <ul style="list-style-type: none"> • 58.6% of people within Snowdonia National Park could speak Welsh, higher than the national average of 19% • 49.7% of people could read, write and speak Welsh within the National Park, higher than the national average of 14.6% <p>In terms of distribution, the lowest percentage of Welsh speakers are on in the western coastal areas of Barmouth, Tywyn and Aberdyfi. 54.6% of people living in Llangelynnin did not have any Welsh language skills at all.</p> <p>The areas with the highest percentages of Welsh speakers included Llanuwchllyn and Y Bala 78.6% of people living in Llanuwchllyn could speak Welsh.</p> <p>According to the 2001 Census, the percentage of Welsh speakers in the National Park was 62.1%. This means there has been a 3.5% decrease in the number of Welsh speakers in the area since 2001. Also during the previous Census, 54.5% of the Park's population could speak, read and write in Welsh. This had decreased 4.8% by the 2011 Census.</p> <p>Policies within the Local Development Plan take in to account the needs and interests of the Welsh Language. The LDP supports development which maintains or enhances the Welsh Language. Any development which causing significant harm to the Welsh Language will be refused. Developments which may have a significant impact are required to submit community linguistic statements, or assessments to enable the Authority to make an informed decision on their impacts. The authority encourages the use of Welsh or bilingual signage on new and existing developments.</p> <p>2020/2021 No new information.</p>

				<p>2021/2022 No new information, update will be provided for the next monitoring period where 2020 Census data will be available.</p>
13a	To safeguard the quality and quantity of water resources	Percentage of Snowdonia's rivers that are classified as Very Good, good, or Fairly Good chemical and biological quality	NRW	<p>2018/2019 According to data received from Natural Resources Wales based on the 2015 dataset, there were 90 rivers assessed in the National Park. The information below details the assessments made on those rivers;</p> <p>Chemical:</p> <ul style="list-style-type: none"> • 83 rivers were classed as being of 'Good' quality • 7 rivers failed to achieve a 'Good' status <p>Ecological Status:</p> <ul style="list-style-type: none"> • 31 rivers were classed as being of 'Good' quality • 56 rivers were classed as being of 'Moderate' quality • 3 rivers were classed as being of 'Poor' quality
				<p>2019/2020 According to data received from Natural Resources Wales based on the 2015 dataset, there were 90 rivers assessed in the National Park. The information below details the assessments made on those rivers;</p> <p>Chemical:</p> <ul style="list-style-type: none"> • 83 rivers were classed as being of 'Good' quality • 7 rivers failed to achieve a 'Good' status <p>Ecological Status:</p> <ul style="list-style-type: none"> • 31 rivers were classed as being of 'Good' quality • 56 rivers were classed as being of 'Moderate' quality • 3 rivers were classed as being of 'Poor' quality
				<p>2020/2021 According to data received from National Resources Wales based on the WFD 2018 dataset, there were 109 rivers assessed in the National Park. This figure included rivers with catchments that overlap with the Park's boundaries, but do not lie fully within the National Park.</p> <p>The information below details the assessments made on those rivers;</p> <p>Chemical:</p> <ul style="list-style-type: none"> • 101 rivers were classed as being of 'Good' quality • 7 rivers failed to achieve a 'Good' status <p>Ecological Status:</p> <ul style="list-style-type: none"> • 50 rivers were classed as being of 'Good' quality • 53 rivers were classed as being of 'Moderate' quality. • 4 rivers were classed as being of 'Poor' quality.
				<p>2021/2022</p> <p>According to data received from National Resources Wales based on the WFD Cycle 3 dataset, there were 108 rivers assessed in the National Park. This figure included rivers</p>

				<p>with catchments that overlap with the Park's boundaries, but do not lie fully within the National Park.</p> <p>The information below details the assessments made on those rivers.</p> <p>Chemical:</p> <ul style="list-style-type: none"> • 105 rivers were classed as being of 'Good' quality • 3 rivers failed to achieve a 'Good' status <p>Ecological Status:</p> <ul style="list-style-type: none"> • 66 rivers were classed as being of 'Good' quality • 39 rivers were classed as being of 'Moderate' quality. • 2 rivers were classed as being of 'Poor' quality. • 1 river was classed as being of 'Bad' quality.
13b	To safeguard the quality and quantity of water resources	Blue Flag and Green Coast Award beaches in Snowdonia	NRW / Keep Wales Tidy	<p><u>2018/2019</u> There were no Blue Flag beaches in Snowdonia in this monitoring year, however the Green Coast Award was awarded to Harlech beach.</p> <p><u>2019/2020</u> No beaches within the Snowdonia National Park Area were Blue Flag beaches nor awarded the Green Coast Award during this monitoring period.</p> <p><u>2020/2021</u> No beaches within the Snowdonia National Park Area were Blue Flag beaches nor awarded the Green Coast Award during this monitoring period</p> <p><u>2021/2022</u> No beaches within the Snowdonia National Park Area were Blue Flag beaches nor awarded the Green Coast Award during this monitoring period</p>
			Keep Wales Tidy https://www.keepwalestidy.cymru/ein-traethau	<p><u>2014/2015</u> Data from NRW, for bathing water is detailed below.</p> <ul style="list-style-type: none"> • Harlech - Excellent • Dyffryn (Llanenddwyn) - Excellent • Llandanwg - Excellent • Tal y Bont - Excellent • Aberdyfi – Sufficient <p><u>2015/2016</u> Data from the NRW website (based on 2015 figures), for bathing water is detailed below;</p> <ul style="list-style-type: none"> • Harlech - Excellent • Dyffryn (Llanenddwyn) - Excellent • Llandanwg - Excellent • Tal y Bont - Excellent • Aberdyfi – Sufficient <p><u>2016/2017</u> This data was received from NRW for bathing water (the data is based on 2016 figures)</p>

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				<p>2017/2018 This data was received from NRW for bathing water (the data is based on 2017 figures)</p> <ul style="list-style-type: none"> • Harlech - Excellent • Dyffryn (Llanenddwyn) - Excellent • Llandanwg - Excellent • Tal y Bont - Excellent • Aberdyfi – Good <p>Successfully over the last year, Aberdyfi's bathing water quality has achieved a 'Good' designation rather than 'Sufficient', resulting in a positive finding for this monitoring period.</p>
13c	To safeguard the quality and quantity of water resources	Bathing and estuary water quality	NRW	<p>2018/2019 This data was received from NRW for bathing water (the data is based on 2018 figures)</p> <ul style="list-style-type: none"> • Harlech - Excellent • Dyffryn (Llanenddwyn) - Excellent • Llandanwg - Excellent • Tal y Bont - Excellent • Aberdyfi – Good
				<p>2019/2020 This data was received from NRW for bathing water (the data is based on 2019 figures)</p> <ul style="list-style-type: none"> • Harlech - Excellent • Dyffryn (Llanenddwyn) - Excellent • Llandanwg - Excellent • Tal y Bont - Excellent • Aberdyfi – Good
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13 D	To safeguard the quality and quantity of water resources	Estimated household water consumption (litres per head per day)	Dŵr Cymru	<p><u>2018-2019</u></p> <table border="1"> <thead> <tr> <th>COMPONENT</th> <th>VALUE</th> <th>UNIT</th> </tr> </thead> <tbody> <tr> <td>Household Per Capita Consumption</td> <td>149.36</td> <td>Litres/head/day</td> </tr> <tr> <td><i>Measured</i></td> <td>129.54</td> <td>Litres/head/day</td> </tr> <tr> <td><i>Unmeasured</i></td> <td>161.39</td> <td>Litres/head/day</td> </tr> </tbody> </table> <p><u>2019/2020</u></p> <table border="1"> <thead> <tr> <th>COMPONENT</th> <th>VALUE</th> <th>UNIT</th> </tr> </thead> <tbody> <tr> <td>Household Per Capita Consumption</td> <td>164.545</td> <td>Litres/head/day</td> </tr> <tr> <td><i>Measured</i></td> <td>162.065</td> <td>Litres/head/day</td> </tr> <tr> <td><i>Unmeasured</i></td> <td>166.207</td> <td>Litres/head/day</td> </tr> </tbody> </table>	COMPONENT	VALUE	UNIT	Household Per Capita Consumption	149.36	Litres/head/day	<i>Measured</i>	129.54	Litres/head/day	<i>Unmeasured</i>	161.39	Litres/head/day	COMPONENT	VALUE	UNIT	Household Per Capita Consumption	164.545	Litres/head/day	<i>Measured</i>	162.065	Litres/head/day	<i>Unmeasured</i>	166.207	Litres/head/day
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14a	To promote mechanisms for waste minimisation, increased re-use and recycling.	Number of sustainable waste management facilities granted planning permission in the National Park and their distance from settlements.	SNPA	<p><u>2018/2019</u> There have been no applications for sustainable waste management facilities during this monitoring period.</p> <p><u>2019/2020</u> There have been no applications for sustainable waste management facilities during this monitoring period.</p> <p><u>2020/2021</u> There have been no applications for sustainable waste management facilities during this monitoring period.</p> <p><u>2021/2022</u> There have been no applications for sustainable waste management facilities during this monitoring period.</p>																								
14b	To promote mechanisms for waste minimisation, increased re-	Percentage of household and industrial/commercial waste recycling.	Stats Wales	<p><u>2018/2019</u> <u>Percentage of household waste re-used/re-cycled:</u> Gwynedd – 30.1 Conwy – 32.6</p>																								

	use and recycling.			<p>Percentage of household waste composted: Gwynedd – 17.9 Conwy – 24.8</p> <hr/> <p><u>2019/2020</u></p> <p><u>Percentage of household waste re-used/re-cycled:</u> Gwynedd – 32.4 Conwy – 36.9</p> <p><u>Percentage of household waste composted:</u> Gwynedd – 18.2 Conwy – 24.7</p> <hr/> <p><u>2020/2021</u></p> <p>Percentage of household waste re-used/re-cycled: Gwynedd – 35.7 Conwy – 38.7</p> <p>Percentage of household waste composted: Gwynedd – 19.6 Conwy – 26.1</p> <hr/> <p><u>2021/2022</u></p> <p>The data for this year's percentage of household and industrial / commercial waste recycling in Gwynedd and Conwy will be updated in October 2022.</p>
15	Improve the quantity and quality of publicly open space	Areas of open space lost to new development within the National Park.	SNPA	<p><u>2018/2019</u></p> <p>Three applications were permitted for the erection of supporters control barrier on either side of the rugby field and creation of footway behind, an advertisement consent to display up to 25 non-illuminated boards of the supporters control barrier around the rugby pitch,</p>

				<p>and for the creation of new access and alteration to layout to allow buses to use the car park. None of these applications resulted in areas lost from open space land.</p> <p><u>2019/2020</u> 11 applications were permitted during this monitoring period either intersecting or within areas designated as open space. However these applications were for householder developments and are not new developments, for instance, alterations such as cladding and extensions. None of these applications resulted in areas lost from open space land.</p> <p><u>2020/2021</u> 16 applications were permitted during 2020/2021 either intersecting or within areas of open space. Of these, only 1 was for new developments. This was for for the erection of a detached garage.</p> <p><u>2021/2022</u> 4 applications were permitted during this monitoring period either intersecting or within areas designated as open space. None of these were for new developments.</p>
16a	To provide housing to meet local need	Affordable dwellings completed as a percentage of all new housing completions	SNPA	<p><u>2018/2019</u> 35% of all completions within the National Park were affordable dwellings. During the AMR period there were 17 dwellings completed and 6 of these were affordable.</p> <p><u>2019/2020</u> 21% of all completions within the National Park were affordable dwellings. During the AMR period there were 14 dwellings completed and 3 of these were affordable.</p> <p><u>2020/2021</u> 50% of all completions within the National Park were affordable dwellings. During the AMR period there were 38 dwellings completed and 19 of these were affordable.</p> <p><u>2021/2022</u> 15% of all completions within the National Park were affordable dwellings. During the AMR period there were 13 dwellings completed and 2 of these were affordable.</p>
16b	To provide housing to meet local need	House price to income affordability ratio	Land Registry and CACI	<p><u>2018/2019</u> The details for the median annual income to median house price ratio, per Housing Market Assessment area, are listed below. (<i>Median house prices are representative of houses sold within the NP boundaries of the HMA areas</i>). The ratios are based on 2018 annual income, and as 2019 is not yet over, it focuses on 2018 housing prices.</p> <ul style="list-style-type: none"> • HMA 11 (Conwy Valley) – 5.9:1 • HMA 10 (Ffestiniog & Porthmadog) – 5.1:1

				<ul style="list-style-type: none"> • HMA 9 (Machynlleth & Aberdyfi) - 6.8:1 • HMA 8 (Bala, Dolgellau & Ardudwy) – 6.1:1 • HMA 6 (Llandudno & Conwy) – 5.8:1 • HMA 4 (Caernarfon) – 6.0:1 • HMA 3 (Bangor) - 7.1:1
				<p><u>2020/2021</u></p> <p>The details for the median annual income to median house price ratio, per Housing Market Assessment area, are listed below. (Median house prices are representative of houses sold within the NP boundaries of the HMA areas). The ratios are based on 2020 annual income, and as 2021 is not yet over, it focuses on 2020 housing prices.</p> <ul style="list-style-type: none"> • HMA 11 (Conwy Valley) – 6.1:1 • HMA 10 (Ffestiniog & Porthmadog) – 5.4:1 • HMA 9 (Machynlleth & Aberdyfi) - 8.2:1 • HMA 8 (Bala, Dolgellau & Ardudwy) – 5.9:1 • HMA 6 (Llandudno & Conwy) – 7.3:1 • HMA 4 (Caernarfon) – 6.0:1 • HMA 3 (Bangor) - 12.0:1
				<p><u>2021/2022</u></p> <p>The details for the median annual income to median house price ratio, per Housing Market Assessment area, are listed below. (<i>Median house prices are representative of houses sold within the NP boundaries of the HMA areas</i>). The ratios are based on 2021 annual income, and as 2020 is not yet over, it focuses on 2021 housing prices.</p> <ul style="list-style-type: none"> • HMA 11 (Conwy Valley) – 6.1:1 • HMA 10 (Ffestiniog & Porthmadog) – 8.4:1 • HMA 9 (Machynlleth & Aberdyfi) - 9.9:1 • HMA 8 (Bala, Dolgellau & Ardudwy) – 7:1 • HMA 6 (Llandudno & Conwy) – 8.1:1 • HMA 4 (Caernarfon) – 6.3:1 • HMA 3 (Bangor) - 8:1

17a	To promote improved access to local services and amenities for all	WIMD – Geographical Access to Services Deprivation Domain	WIMD	<p><u>2018/2019</u> No new up to date information</p> <p><u>2019/2020</u> Presently, there is no new up to date information. This data was only available to a Gwynedd and Conwy council level and also LSOA level. The most recent MALIC was published in 2014.</p> <p><u>2020/2021</u> No new up to date information</p> <p><u>2021/2022</u> No new up to date information</p>
17b	To promote improved access to local services and amenities for all	Number of new community facilities granted planning permission per annum and their proximity to public transport facilities.	SNPA	<p><u>2018/2019</u> Between 2018 and 2019, there were 5 applications approved for new or improved community facilities in Local Service Centre's and Secondary Settlements. These applications were for the change of use from law court to a dental surgery, a construction of a lychgate on site of existing gated access to churchyard to house World War I Memorial Tablet, extensions to two cemeteries, and an erection of supporters control barrier on either side of the rugby field and creation of footway behind.</p> <p><u>2019/2020</u> Between 2019 and 2020, there were 2 applications approved for new or improved community facilities in Local Service Centre's and Secondary Settlements. These applications were a Listed Building Consent for alterations to a former Chapel in Llanbedr, for a continuing religious use, and Cylch Meithrin Ffronoch received permission improvements consisting of a cabin, play & parking areas.</p> <p><u>2020/2021</u> Between 2020/2021, there were 4 applications for new or improved community facilities in Local Service Centre's, Local Service Settlements and Secondary Settlements. These were for a Listed Building consent for outdoor alterations to Neuadd y Cyfnod, Bala, a change of use from a shop to a cafe for the Coed y Brenin visitor Centre in Ganllwyd, change of use from a theatre to an exhibition space at the Snowdon Mountain Railway Station in Llanberis and the upgrading of public toilets in Llanuwchllyn.</p> <p><u>2021/2022</u> There were 6 applications for new and improved community facilities during 2021/2022. There were applications for new or improved community facilities in Local Service Centres and Secondary Settlements. One was for two new doors and an all ability ramp at Penmachno community centre, another two were for electric vehicle charge points in Bala and Bontddu. Another was for the installation of a bench in association with the Authority's Dark Sky project. Another was for a demolition and construction of a new building at Llanuwchllyn community Centre. Lastly, there was an application for new windows at Talsarnau community Centre.</p>

18a	To promote safe, healthy and sustainable communities	Percentage of persons with long-term limiting illness in Snowdonia	WAG SNPA	2018/2019 No new up to date information
				2019/2020 No new up to date information. Data from the 2011 census contained information on the health and wellbeing of the population. Information on persons with long term limiting illness in Snowdonia National Park is shown below; <ul style="list-style-type: none"> • Day-to-day activities limited a lot - 9.4% (2,410) • Day-to-day activities limited a little - 12.0% (3,086)
				2020/2021 No new up to date information.
				2021/2022 No new up to date information. Data from the 2020 census will contain information on health and wellbeing of the population, this will be available for next year's monitoring report.
18b	To promote safe, healthy and sustainable communities	Percentage of persons whose health was 'good' over the last 12 months in Snowdonia	Census	2018/2019 No new up to date information
				2019/2020 No new up to date information. Data from the 2011 census contained information on the health and wellbeing of the population. Information on the health of people living in Snowdonia National Park is shown below. 32.8% (8,419) of people living in Snowdonia National Park noted that their health was 'Good' at the time of the 2011 Census.
				2020/2021 No new up to date information.
				2021/2022 No new up to date information. Data from the 2020 census will contain information on health and wellbeing of the population, this will be available for next year's monitoring report.
18c	To promote safe, healthy and sustainable communities	WIMD – Health Deprivation Domain	WIMD	2018/2019 No new up to date information
19a	To promote and facilitate improved community involvement	WIMD – Geographical Access to Services Deprivation Domain	SNPA	2018/2019 No new up to date information
				2019/2020 No new up to date information. This data was only available to a Gwynedd and Conwy council level and also LSOA level. The most recent MALIC was published in 2014
				2020/2021 No new up to date information.
				2021/2022 No new up to date information.

19b	To promote and facilitate improved community involvement	Number of new community facilities granted planning permission in the National Park.	SNPA	<p><u>2018/2019</u> Between 2018 and 2019, there were 5 applications approved for new or improved community facilities in Local Service Centre's and Secondary Settlements. These were for the change of use from law court to a dental surgery in Dolgellau, a construction of a lychgate on site of existing gated access to churchyard to house World War I Memorial Tablet, extensions to two cemeteries, and an erection of supporters control barrier on either side of the rugby field with a creation of footway behind.</p> <p><u>2019/2020</u> Between 2019 and 2020, there were 2 applications approved for new or improved community facilities in Local Service Centre's and Secondary Settlements. These applications were a Listed Building Consent for alterations to a former Chapel in Llanbedr, for a continuing religious use, and Cylch Meithrin Frongoch received permission improvements consisting of a cabin, play & parking areas.</p> <p><u>2020/2021</u> Between 2020/2021, there were 4 applications for new or improved community facilities in Local Service Centre's, Local Service Settlements and Secondary Settlements. These were for a Listed Building consent for outdoor alterations to Neuadd y Cyfnod, Bala, a change of use from a shop to a cafe for the Coed y Brenin visitor centre in Ganllwyd, change of use from a theatre to an exhibition space at the Snowdon Mountain Railway Station in Llanberis and the upgrading of public toilets in Llanuwchllyn.</p> <p><u>2021/2022</u> There were 6 applications for new and improved community facilities during 2021/2022. There were applications for new or improved community facilities in Local Service Centres and Secondary Settlements. One was for two new doors and an all ability ramp at Penmachno community centre, another two were for electric vehicle charge points in Bala and Bontddu. Another was for the installation of a bench in association with the Authority's Dark Sky project. Another was for a demolition and construction of a new building at Llanuwchllyn community centre. Lastly, there was an application for new windows at Talsarnau community centre.</p>
19c	To promote and facilitate improved community involvement	The distance of new community facilities granted planning permission from public transport services.	SNPA	<p><u>2018/2019</u> One new community facility was granted during this monitoring period. This was for the change of use from law court to a dental surgery in Dolgellau. This new development is located within 0.1 miles of the nearest bus stop, and as there is no train station in Dolgellau, the nearest station would be in Barmouth that is located roughly 8.2 miles away.</p> <p><u>2019/2020</u> Between 2019 and 2020, there were 2 applications approved for new or improved community facilities in Local Service Centre's and Secondary Settlements. These</p>

			<p>applications were a Listed Building Consent for alterations to a former Chapel in Llanbedr for a continuing religious use, located within 120ft of a bus stop and 0.5 mile of a train station. The second application was for Cylch Meithrin Frongoch received permission improvements consisting of a cabin, play & parking areas located within 2.6 miles to the nearest bus stop and 3.5 miles from a train station.</p>											
			<p><u>2020/2021</u></p> <p>There were 4 applications for new and improved community facilities during 2020/2021. There were applications for new or improved community facilities in Local Service Centres, Local Service Settlements and Secondary Settlements. One was for a Listed Building consent for outdoor alterations at Newydd y Cyfnod, Bala, located within 600 feet of a bus stop and 15 miles of a train station. Another was for change of use from a shop to a cafe for the Coed y Brenin visitor centre in Ganllwyd, located within 1000 feet of a bus stop and 9 miles of a train station. Another was for change of use from a theatre to an exhibition space at the Snowdon Mountain Railway Station in Llanberis, located within 450 feet of a bus stop and 7.3 miles of a train station. Lastly, the upgrading of public toilets in Llanuwchllyn, located within 500 feet of a bus stop and 14.8 miles of a train station.</p>											
			<p><u>2021/2022</u></p> <table border="1"> <thead> <tr> <th rowspan="2">Development Description</th> <th colspan="2">Distance to public transport</th> </tr> <tr> <th>Bus</th> <th>Train Station</th> </tr> </thead> <tbody> <tr> <td>Insertion of two new doors and all ability ramp - Penmachno Community Centre</td> <td>140m</td> <td>23.7km</td> </tr> <tr> <td>Installation of electric vehicle charge point, feeder pillar and associated work - Bala</td> <td>126m</td> <td>0.28km</td> </tr> </tbody> </table>	Development Description	Distance to public transport		Bus	Train Station	Insertion of two new doors and all ability ramp - Penmachno Community Centre	140m	23.7km	Installation of electric vehicle charge point, feeder pillar and associated work - Bala	126m	0.28km
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	Bus	Train Station												
Insertion of two new doors and all ability ramp - Penmachno Community Centre	140m	23.7km												
Installation of electric vehicle charge point, feeder pillar and associated work - Bala	126m	0.28km												

				Installation of 2 no. electric vehicle quick charging points and 2 no. electrical cabinets, associated cabling and ancillary works - Bontddu	95m	14.6km
				Installation of bench in association with the Authority's Dark Sky Project - Dolgellau	419m	5.6km
				Demolition of existing building and construction of a new building on the same footprint - Llanuwchllyn Community Centre	104m	5.5km
				Replacement windows - Talsarnau Community Centre	183m	24.4km

APPENDIX 4: SUMMARY OF STAKEHOLDER COMMENTS AND OFFICER RESPONSES

Ref	Comment	Question Number	Subject	Name	Surname	Organization	Officer Summary	Officer Response
001	1	1	Housing/ Welsh Language	Lis	Pugh	CC Llanuwchllyn	Applications for new housing should be approved on the basis of local demand, demand should be determined through constantly updated data. Emphasizing the need for houses to buy and rent for the local market and the importance of protecting the Welsh language as a community language.	Noted and agree. An initial analysis of house prices, income, second homes and holiday accommodation data for the National Park area suggests that ELDP policies should consider focusing on achieving accessible local market housing and affordable housing to ensure the long-term viability of Eryri's local communities and to protect Welsh languages' interests. The Housing Authorities will prepare a new Local Housing Market Assessment by 2024, which will be important evidence, together with the Rural Housing Enabler's local needs assessments and the Tai Teg housing register
001	2	2	Housing	Lis	Pugh	CC Llanuwchllyn	Agree that there is a need for new measures to control the housing market due to an increase in second homes/holiday homes.	Noted.
001	3	2	Housing/ Tourism	Lis	Pugh	CC Llanuwchllyn	Agree that benefits from the tourism industry should outweigh the disadvantages, need to consider this constantly	Agree. The impact of the tourism industry on the National Park and its communities will be a significant factor in revising and drawing up the LDP.

001	4	3	Sustainable Communities	Lis	Pugh	CC Llanuwchllyn	Agree on 'the need for people to be able to live locally'. Agree that smaller developments should be allowed in rural areas on condition that they strengthen the cultural and social fabric of the area. Need to consider the effects of larger developments on communities.	Agree
001	5	4	Housing	Lis	Pugh	CC Llanuwchllyn	All development should be proportionate to the need/demand in that area. Agree that there should be a move away from the 'random' developments.	Agree; the Plan will need to ensure a sustainable hierarchy of settlements as a basis for providing developments and services in the National Park.
001	6	5/6	Welsh language	Lis	Pugh	CC Llanuwchllyn	Emphasize the consideration of the impact of each policy and development on the Welsh language. Propose the use of independent linguistic assessments for any significant development.	Agree. As part of the review process, the impact of each policy on the Welsh language will be assessed, and the impact of the strategy will also form part of the Assessment. Will consider the ability of requesting an independent linguistic assessments on significant developments further as part of plan revision and future Supplementary Planning Guidance update.
001	7	10	General	Lis	Pugh	CC Llanuwchllyn	Agree with the need to protect Communities as this should be a consideration in every policy and development.	Agree.

001	8		Housing	Lis	Pugh	CC Llanuwchllyn	A time limit should be placed on sites, to avoid other developments being blocked if the site is left for a long period.	The Planning Act does not enable a time limit to be placed on the development of a site with planning permission
001	9	10	Tourism	Lis	Pugh	CC Llanuwchllyn	We believe that tourism developments need to be assessed on the basis of quality rather than numbers 'quality not quantity'.	Agree. It is important to ensure that the LDP enables and promotes good quality and sustainable developments to be able to protect and improve the special qualities of the National Park. This will be the priority when reviewing and drawing up the LDP.
001	10	2	Historical Environment	Lis	Pugh	CC Llanuwchllyn	It should consider the well-being of the wider community in every policy and decision, this includes protecting the environment and historic buildings	Agree. The purposes of the National Park provide a clear statement of statutory responsibilities and the role of National Park Authorities. These are: 1. Protect and enhance the natural beauty, wildlife and cultural heritage of the area, 2. Promote opportunities for the public to understand and enjoy the 'Special Qualities' of the area. In addition to these purposes, it is the duty of the Authority to advance these purposes to: 3. Seek to foster the economic and social well-being of local communities in the National Park. As stated, the conservation and enhancement of the cultural heritage is a factor of the greatest importance when considering development within or adjacent to these special

								areas. This duty is not only to protect and improve these special features, but also to promote awareness and understanding to ensure the value of these special features for future generations to enjoy as well as fostering the economic and social well being of the communities local. This will be a key factor in reviewing the policies and strategy of the LDP.
002	1	1	Public health	Aled	Hughes	Public Health Wales	Propose we look at WHIASU's work - specifically in the context of post-pandemic planning, climate change and flood risk. WHIASU – Welsh Health Impact Assessment Support Unit	Noted. A Health impact assessment will be completed as part of the replacement plan process and we will have a look at the work of WHIASU as part of this process.
002	2	5	Public health	Aled	Hughes	Public Health Wales	Consideration should be given to local work that is going on e.g. in the Friog community where CG and Betsi Cadwaladr have commissioned a Health Impact Assessment - something possible to add to the evidence.	Noted. We will keep this study in mind and try to contact the person who was part of the work in order to discuss further.

002	3	6	Public health	Aled	Hughes	Public Health Wales	HIA's should be considered if/when appropriate.	HIA (Health Impact Assessments) will be carried out as part of the replacement plan process, along with an Equality Impact Assessment, Welsh Language Assessment etc..
003	1	1	Employment	Owen Gwilym	Thomas		Possible for employers and former leading employers in the area to give input in terms of employment?	Noted. There are representatives of business groups included within the Community Involvement Scheme. We will ensure that the wider business community is kept in mind when revising the Plan
003	2	3	Employment	Owen Gwilym	Thomas		Need to give priority to employment - seeing current planning policies as a barrier for potential investors. Hoping for a different approach when reviewing the plan.	The Local Development Plan (and the employment policies) have been drawn up to support the local rural economy, while protecting the environment, landscape and local population. The Annual Monitoring Reports showed that the number of jobs and employment units has gradually increased from year to year and that there have also been no concerns raised in terms of missing targets. The current economic policy has been drawn up to facilitate and promote appropriate economic developments and no concerns have been raised from the annual monitoring that it hinders developments. As stated in the Review Report (page 7), work is being undertaken

								jointly with Gwynedd and Anglesey Council in order to look at reviewing and assessing the provision of employment land within the National Park. This work will assist us in forming an evidence base for revising the Local Development Plan's employment strategy. The work will help the Authority to decide what changes to make to the current policies, and if continuing to protect employment sites is the way forward or if there is a need for additional sites within the National Park
003	3	9	Welsh Language / Employment	Owen Gwilym	Thomas		Need to increase the number of posts in order to be able to protect the language - the review should reflect this.	See above comment
003	4	10	Tourism	Owen Gwilym	Thomas		APCE and Gwynedd Council do not work together. See the possibility of raising tourism tax and the higher premiums on second homes as harmful to the area and the tourism industry.	The Authority and Gwynedd Council work together on several topics including Housing issues, the Historic and Natural Environment, Tourism and the Economy etc and will continue to work closely in developing the evidence base and in the process of revising the LDP. The Authority doesn't have powers in relation to tourism tax and premiums.

004	1	4	Employment	Hannah	Gray	Magnox/NDA	See attached letter. NDA/Magnox wish to discuss and review Strategic Policy B in order to go along with their plans.	<p>Update Policy 27; Eryri Enterprise Zone - As noted in the Review Report, the Authority will re-examine this policy as part of the review, ensuring that we are in line with the latest policies and guidelines on the text.</p> <p>As noted in your comment, discussions have begun with Magnox/Avison Young regarding the Planning Framework and that will continue over the coming months. There is a possibility that these discussions can help to review and change the current policy, and also get new supporting papers.</p> <p>Strategic Policy B – As noted in the Review Report, it is considered that this policy is being implemented effectively. We note your comments regarding PPW 11 and we would hold discussions with the Welsh Government during the review process to ensure that the wording of Policy B reflects the current situation.</p>
004	2	5	Employment	Hannah	Gray	Magnox/NDA	See attached letter. We would like to see a background paper relevant to Nuclear decommissioning as part of the evidence for the new Plan.	Noted. Creating a background paper about this topic could be useful in order to ensure correct developments and formalize the process on this site

005	1	2	Transport			Network Rail	<p>Need to consider 'level crossings' when developing Active Travel Plans. Any transport development that uses level crossing should be refused if no consultation with Network Rail has taken place - any increase in risk needs to be assessed by a transport statement. We ask the planning authority to make mandatory assessments through a transport statement if there is an increase in the use of level crossings.</p> <p>Suggest wording similar to the below for relevant sites: <i>"Assess through a transport statement and provide any required improvements to level crossings where development could lead to a significant increase in the use of a level crossing by pedestrians and/or vehicles, in consultation with Network Rail".</i></p>	Noted.

005	2	7	Transport			Network Rail	In accordance with paragraph 7.7, the impact of development on railway infrastructure should be considered in consultation with Network Rail if relevant.	Noted.
006	1	1	Public Health	Guto	Gwyn	Bwrdd Iechyd Betsi Cadwaladr Health Board	Perhaps you should refer to recent inflation and increases in the cost of living - the knock-on effects of this on the health of the population and the local economy.	Agree to add reference to inflation and increase in living costs in chapter 4 of the Review Report.
006	2	2	Public Health	Guto	Gwyn	Bwrdd Iechyd Betsi Cadwaladr Health Board	Reference should be made to the "Live Healthy, Stay Healthy" Strategy. The Health Board's 10-year strategy was updated in 2021 to help people manage their health and wellbeing.	Noted. This will be added to section 5 of the Review Report
006	3	7	Public Health	Guto	Gwyn	Bwrdd Iechyd Betsi Cadwaladr Health Board	It would be useful to find out what would be the best ways for the Health Board to support the Plan in practice.	We would consult with the Health Board (and everyone else on our contact database) at various stages and different stages of the review process. Receiving comments and any possible guidance from the Health Board on specific steps would be very useful.

007	1	1	Housing	Jones	Mostyn	Llanrwst Town Council	<p>Suggest that APCE take steps to encourage housing developers to the area e.g designate bulky housing sites - in order to increase the number of affordable properties available.</p> <p>“the Committee think it reasonable to suggest that the Authority take steps to incentivise regional house builders to become active in this area, such as allocating large allocations for development. Please note that we would like the focus of the building work to be on affordable and social housing”.</p>	<p>There are no regional house builders active in the market in the National Park area, and there is no pressure from them to provide land for housing. The regional house builders focus on larger towns that lie beyond the National Park boundary. The housing market in the National Park is localised in nature, relying on small local builders and self-build projects on small sites. Large allocations have been included in the current plan but have yet to be developed by the private sector. Private sector development has not brought forward affordable housing in any significant numbers. The Authority will undertake a plan wide viability assessment of housing policies which will analyse what proportion of housing development can be affordable. Both Gwynedd and Conwy Local Housing Market Assessment will also be taken into consideration when revising the Plan. The reduction in house building in recent years cannot be solely attributed to the ELDP policies as wider economic factors have had a significant impact.</p>

								<p>Allocations must be supported by robust evidence on delivery, phasing, infrastructure requirements and viability. A large housing allocation will only be suitable if a developer can demonstrate these factors. Large allocations must be assessed carefully for linguistic impacts upon a settlement, and the settlement hierarchy ensures developments are commensurate to the size of the settlement.</p> <p>Housing associations have delivered the majority of affordable housing over recent years within the National Park. The size their developments will be tailored to an identified need in the area of the development. It is agreed that focus should be on delivering affordable and social housing.</p> <p>Also addressed by amended paragraph 7.42 of the Review Report</p>
007	2	1	Housing	Jones	Mostyn	Llanrwst Town Council	Disagree with the statement in 4.21. Propose that the reason for the (projected) reduction in households with children is SNPA's failure to provide affordable property. Lower housing unit projections	Population projections provide an essential baseline scenario which must be taken into account when calculating the housing requirement of a local development plan' along with other evidence such as housing and local need assessments. Housing requirements must also

						<p>with the potential to worsen the situation further and lead to more than 41.8% of households with only one resident.</p> <p>Disagree with lowering housing unit projections - "defeatist trajectory". Increasing the number of affordable properties is essential for ensuring sustainable communities and protecting the Welsh language.</p>	<p>consider a range of other factors such as past build rates, percentage of Welsh speakers etc. Delivery will be constrained by supply factors such as capacity (social, physical; environmental, cultural), land values, infrastructure, flooding, phosphates, changes in demographics, household numbers migration etc. These supply factors will reduce the amount that can be delivered and will be reflected in the final housing requirement.</p> <p>The current plan's housing requirement is not being met largely due to wider economic factors. The majority of allocations in the current plan have not been developed, despite the ELDP policies being supportive. Input from developers suggests that economic factors are a significant factor in not developing allocations and sites with planning permission. An unrealistically high target not in line with household projections that will not be met will serve no useful purpose. If the target for the revised plan were to be lowered to reflect need and evidence, it will still be aiming for significant numbers of housing. The Authority unlikely to be proposing a housing requirement figure based on the low household projections figures reflected in the 2018 based</p>
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								<p>household projections alone. The national park household projections will be a starting point and the needs of local communities, along with the consideration referred to above will be necessary. Housing growth must be realistic, based on evidence, viability assessments, need assessments, the LHMA, and linked with economic growth.</p> <p>It is agreed that affordable housing is required for thriving, sustainable Welsh language communities and policies will seek to ensure they are delivered. The Authority will seek to encourage and facilitate house building by working with stakeholders to deliver affordable housing.</p> <p>Paragraph 4.21 amended for clarification.</p>
007	3	1	Housing	Jones	Mostyn	Llanrwst TC	<p>The availability of houses to rent is less than before. According to a report for Conwy Council demand is higher due to more 'evictions' in the private sector - suggest that this, linked to higher interest rates and changes to the 'renting homes Wales act' are the reasons for the lack</p>	<p>Noted. The Authority collaborates with the Housing Authorities, who produce LHMA, with information and an assessment of the rental market. Reference to the Act added to Paragraph 4.16</p>

							of property, rather than homes being used as holiday accommodation. Suggesting that APCE review the situation.	
007	4	1 + 7	Housing	Jones	Mostyn	Llanrwst Town Council	4.17 – disappointed that a solution to the problem of car parking has not been presented. See Llanrwst as a suitable location for some kind of transport plan e.g. Park and Ride for visitors from the A470. This can help take pressure off towns like BYC. Glasdir Car Park has been identified as a suitable site by the Town Council.	Parking options will be considered as part of a transport strategy for the National Park and will also be part of Cynllun Eryri's remit. There is potential for sites outside the National Park boundary to contribute to the strategy, although they will not be subject to Eryri LDP planning policies.
007	5	1	Tourism	Jones	Mostyn	Llanrwst Town Council	4.18 – Considering the increase in campervans and irresponsible wild camping, we ask SNPA to reconsider allowing new camping sites and caravans and to consider charging visitors who stay in 'lay-by's'.	The impact of the tourism industry will be taken into account when reviewing and drawing up the plan. This will be done by weighing up the evidence before reaching an informed and balanced conclusion on the strategy regarding the increase in campervans and wild camping. Historically, studies have stated that allowing new camping sites and caravans would have a detrimental effect on the special qualities leading to the criteria and text of Development Policies 22 and 23 of the current plan. Evidence will therefore be a key factor in reviewing these policies. In terms of charging

								visitors who stay in laybys, this is this sits beyond planning powers and may be more relevant for Cynllun Eryri and partners to consider
007	6	2	Conservation Areas	Jones	Mostyn	Llanrwst Town Council	5.97 – Agree but believe that historic buildings are not adequately protected in the Llanrwst conservation area. I would like to see help (financial if possible) given to people who cannot afford the maintenance of their homes if they are listed buildings.	With the town of Llanrwst sitting on the border of the National Park, and with the Conservation Area sitting entirely within Conwy Council's Local Planning Authority area, the Authority is not a statutory consultee on planning applications within Llanrwst Conservation Areas and have no powers to intervene.
008	1	1	Environment	Rhys	Jones	Natural Resources Wales	More stringent targets on phosphate levels in rivers need to be included as part of the evidence.	Noted. When undertaking work relating to phosphate during the review period, and updating the evidence base, we would liaise with NRW and other organizations to ensure that requirements relating to phosphate are met and achieved.
008	2	3	Environment	Rhys	Jones	Natural Resources Wales	Welcome that the effect of phosphate levels on SAC's Rivers has been identified as an important issue to be considered in the review of the Plan.	Noted. Work has already been carried out by the Park Authority in terms of looking at which areas there is a possible impact. We are currently looking at work undertaken by Wrexham County Council's regarding phosphate to learn from best practice elsewhere.

008	3	5	Environment	Rhys	Jones	Natural Resources Wales	In terms of further evidence to consider - this should include evidence from Nutrient Management Boards, relevant land management sources and waste water treatment works. Also suggesting solutions based on the 'catchments' e.g. 'nutrient calculator' among other options.	Noted. Much like the previous comments, when we undertake work related to phosphate during the review period, and update the evidence base, we would contact NRW and other organizations to ensure that requirements regarding phosphate are met and reach them (along with evidence from Nutrient Management Boards). It will also be important to have regular discussions with Dwr Cymru.
008	4	7	Environment	Rhys	Jones	Natural Resources Wales	4 SAC Rivers within the Park, collaboration with neighbouring authorities and the Nutrient Management Boards is crucial.	We have started the process of collaborating with other organizations on this topic and that will continue throughout Plan revision
009	1	1	Housing	Gareth	Bayley-Hughes	ADRA	3 more points to consider for the review: 1. Unstable economic situation Higher interest rates etc are likely to have an impact on the affordability of new developments - need to be considered when deciding on the targets of the new Plan.	<ol style="list-style-type: none"> 1. Agree. 2. Agree. Evidence from the LHMA along with the viability assessment of the scheme is important. 3. The Authority will not be responsible for tourism tax

							<p>2. Cost of living/ housing affordability People's ability to buy new homes needs to be considered, especially when deciding on the Scheme's affordable housing targets. Who will be able to buy the property is going to affect the type of property needed etc. Second homes and high private rental costs are exacerbating the unaffordability of property in the area.</p> <p>3. Tourism Tax Many possible effects e.g. numbers of visitors in general affecting businesses, a possible increase in buying second homes to avoid tourism tax and an increase in airbnb's as tourism tax is not mandatory in their model - (not sure if this is correct ??).</p>	
009	2	2	Housing	Gareth	Bayley-Hughes	ADRA	Also need to consider the Development Plan/Strategies of the housing associations as well as those of the local	Agree. Review Report amended to reflect this (paragraph 5.105).

							authorities (Gwynedd and Conwy in this case).	
009	3	2	Environment	Gareth	Bayley-Hughes	ADRA	Consider advice from NRW when dealing with nature conservation and the effects of development on phosphate levels.	Noted. We would consult on a number of stages during the review process and NRW's comments will be important when dealing with topics such as nature conservation and phosphate/developments
009	4	7	Housing	Gareth	Bayley-Hughes	ADRA	Opportunities for APCE to collaborate more closely with social housing providers on their strategies/plans. There should be collaboration/consultation with small contractors with a history of completing smaller developments in the area, as well as with land of daredevils in order to identify suitable sites.	Agree.
009	5	8	Housing	Gareth	Bayley-Hughes	ADRA	Agree that a review is needed. LDP has often been an obstacle for social housing providers, it is possible to increase provision if some policies are revised/relaxed.	The LDP is supportive of affordable housing and several housing association sites have been allocated in the current plan. It will be necessary to continue the dialogue and consider which elements of the ELDP policies are seen to be an obstacle for Housing Associations to the development of affordable housing.

009	6	9	Welsh language	Gareth	Bayley-Hughes	ADRA	The job opportunities that come by allowing more developments would enable young people to stay in the area, in the same way increasing the provision of affordable housing for local people would enable Welsh speakers to stay in the area.	Acknowledge the job opportunities provided by housing developments and agree with the need to provide affordable housing to enable Welsh speakers to stay in the area.
010	1	1	Tourism	Rebeca	Jones	Cyngor Gwynedd Council	4.19 - Want to continue discussions about providing 'aires' for campervans within the Park and wish us to take this subject into consideration when reviewing policies. CG has received inquiries regarding car parks in Dolgellau and Bala.	The pressure and impact of the tourism industry will be taken into account when revising and drawing up the plan. This will be done by weighing up the evidence before reaching an informed and balanced conclusion on the strategy regarding the increase in campervans and wild camping. Historically, studies have stated that allowing new camping sites and caravans would have a detrimental effect on the special qualities leading to the criteria and text of Development Policies 22 and 23 of the current plan. Evidence will be a key factor in revising these policies as well as learning from the experiences of other areas. The input of communities to the process will be very important. It will also be

								necessary to continue to ensure that we protect and improve the special qualities of Eryri.
010	2	2	General	Rebeca	Jones	Cyngor Gwynedd Council	Gwynedd Council's 2023-2028 Plan should be an important consideration for part 5 of the report.	Agree that it is necessary to include Gwynedd Council's Plan 2023 - 2028 in part 5 of the Review Report and to consider the 7 priority areas when revising the Plan.
010	3	4	Environment	Rebeca	Jones	Cyngor Gwynedd Council	<p>Part 7, specifically the part which relates to Protecting, Improving and Managing the Natural Environment. This part should refer more to the impact of climate change on communities, land use (especially in areas with flood risk).</p> <p>Need to pay attention to the Shoreline Management Plan (SMP2) which suggests policy changes in vulnerable areas (beyond the new flood maps). He can identify these changes while reviewing the plan to prevent developments that will be contrary to the SMP.</p>	<p>Noted</p> <p>Officers from the National Park will meet with officials from Cyngor Gwynedd Council/Ymgynghoriaeth Gwynedd Consultancy soon in order to discuss the Shoreline Management Plan and understand what the implications are for Gwynedd Council and possibly the Park as a result of this. The Plan has been mentioned and discussed within par 5.33 of the Review Report and the Plan will continue to be considered when revising the Eryri Local Development Plan</p>
010	4	5	Tourism	Rebeca	Jones	Cyngor Gwynedd Council	Asked if there is an intention to prepare/update a tourism paper? As there is no reference to this field in the list in part 8.	The lack of reference to reviewing the Tourism Background Paper is an oversight and this will be rectified in the final Review Report.

011			Heritage			Cyngor Tref y Bala	Agree with all Llanuwchllyn's comments. Important to maintain the heritage area and ensure consistency in the implementation of the rules/policies. It has been noted that the phosphates problem is currently impeding development.	Agree with the importance of maintaining the conservation area and ensuring consistency. The Authority will need to continue to work with partners to consider phosphate issues in the area
012			General			Cyngor Cymuned Llangywer	Agree with all Llanuwchllyn's comments. Think it's necessary to re-consider the 'commuted sum payments' situation and the benefit it brings to the area.	Noted; Housing policies will be re-considered, including affordable housing contributions and commuted sums.