

ATTACHMENT 1

Summary of representation received regarding the 'Special Landscape Supplementary Planning Guidance' and the 'Open Space Supplementary Planning Guidance'

'Special Landscape Supplementary Planning Guidance (SPG)':

Issue Raised by Respondent	LPA Comment	Proposed Change to SPG?
Overall Borth Community Council welcomes the draft SPG on SLAs and is pleased to see the breadth of coverage across the County and in particular that Borth and Ynys Las is identified for the local designations of SLAs 1 and 2.	Comment noted.	No change
Borth Community Council are supportive of the geographical area covered by SLA1 and SLA2 and the boundary justifications provided.	Comment noted.	No change
Borth Community Council are pleased with the quality and character of the landscape in its own right is recognised, especially in an area with many nature conservation designations identified.	Comment noted.	No change
Borth Community Council agree with the key characteristics identified and are pleased to not that the sense of wilderness, views and low horizons are recognised as important qualities and that this is bought through to the key policy and management issues. It may be worth	Comment noted.	Add the following to Key Characteristics list for SLA 1: "Benefits from borrowed views of the Snowdonia National Park and in turn the National Park borrows views from the SLA."

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<p>adding a note to stat that the borrowed views to the north are of the Snowdonia National Park, a nationally protected landscape and that in turn the National Park borrows views from SLA 1.</p>		
<p>Two built environment characteristics that are not included under SLA 1 are tourist and holiday developments and the coastal settlement of Borth, which has a character of its own, distinct from many inland settlements with its multi period housing and colours. Both these have been picked up in other SLAs and merit being included in SLA 1.</p>	<p>Comment noted.</p>	<p>Add the following to Key Characteristics list for SLA 1:</p> <p>“Areas of tourism development”</p> <p>And</p> <p>“Includes Lower Borth, a distinctive multi period coastal resort.”</p>
<p>Key Policy and Management Issues for SLA 1 are very agreeable.</p> <p>It would be useful to have an additional management recommendation relating to signage, which is vital for the area both for conservation purposes and also for the Tourism, recreational and business needs.</p>	<p>Comment noted.</p>	<p>Add the following to Key Policy and Managements Issues list for SLA 1:</p> <p>“Manage the visual impact of signs and advertisements”</p>
<p>We note that Upper Borth is excluded from both SLA 1 and SLA2. SLA 2 is recognised as being under pressure for developments, particularly tourism related and that settlement edges should be</p>	<p>One of SLA 2's Key characteristic recognised in the SPG is that it is “Under pressure to development.” One of its Key Policy and Management Issues is therefore to “Address settlement edge landscape</p>	<p>No Change.</p>

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<p>considered. This could be expanded to Settlement/Development Edge to include many forms of change. Whilst developments in the adjacent area may impact on SLA 2, Borth Community Council do understand that this area is locally designated for its geology and habitats significance and many developments may not impact upon this.</p>	<p>quality through careful design, planning controls and guidance.” This taken in combination with the LDP’s other landscape policies, namely DM17, DM19 and DM20, matters relating to the impact of development on landscape are dealt with by the LDP.</p>	
<p>The Golf Course should be added to the features in paragraph 3.1.19.</p>	<p>Comment noted</p>	<p>Amend paragraph 3.1.19 as follows: “...The southern end of the SLA is formed by Constitution Hill, which also exhibits the Aberystwyth Grits, and the historic Aberystwyth Golf Course...”</p>
<p>In summary, Borth Community Council will take note of this SPG if formally adopted, along with the LDP in relevant Council matters. They welcome the SPG and its positive use as an information resource, relevant to the Dyfi Biosphere, as well as a material consideration to support LDP policies.</p>	<p>Comment noted.</p>	<p>No change</p>
<p>The Cambrian Mountains Society welcomes this opportunity to respond to the Local Authority's Special Landscape Areas draft SPG.</p>	<p>Comment noted.</p>	<p>No change</p>
<p>Despite some concern that SLAs do not</p>	<p>Comment noted.</p>	<p>No change</p>

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<p>having the planning strength of statutory designation the Cambrian Mountains Society would like to add its support to the Authority's draft SPG. In their opinion the well researched descriptors for each SLA will assist all concerned in coming to the correct planning decisions within these highly valued landscapes.</p>		
<p>The Cambrian Mountains Society are concerned about one of the 'Key Policy and Management Issues' raised for both SLA 12 and 13 highlighting the management of the cumulative effects of energy developments (3.1.97, page 67 and 3.1.106, page72).</p> <p>The Society doubts if this guidance has the weight to prevent Developments of National Significance taking priority. In contrast, from the same sections in the document, CMS backs the Authority in supporting an ecosystem-based approach in both of these vulnerable upland areas.</p>	<p>The role of the SPG is not to prevent renewable energy development within SLAs and it does not override the requirements set out within Technical Advice Note 8. The SPG should be regarded in combination with all policies of the LDP, which determine to balance many competing interests. With regard to renewable Energy development, Policies LU25, DM17, DM18, DM19, DM20 and DM21 will all seek to ensure that proposals do not have a significantly adverse effect on landscape quality.</p>	<p>No change.</p>
<p>The Cambrian Mountains Society notes that much of the preparatory work towards designating the SLAs was achieved using Natural Resources Wales' LANDMAP system. The Society have for several years recognised what a powerful tool, this</p>	<p>Comment noted.</p>	<p>No change</p>

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<p>GIS is when persuading others of the qualities of a landscape. The Authority is to be commended on using all the layers of the system to help build the case for each SLA.</p>		
<p>Aberystwyth town is considered to be of outstanding cultural and historic landscape value according to LANDMAP, but is not considered a Special Landscape Area. It would be helpful if the reasons for this were included in the Boundary Justification (3.1.21, page 29).</p>	<p>The SPG does not contain a full methodological justification as to why certain areas do not form part of SLAs. This justification is provided in the initial background work conducted by consultants TACP in 2011. The document may be downloaded from the County Councils web site.</p> <p>http://www.ceredigion.gov.uk/utilities/action/act_download.cfm?mediaid=24003&langtoken=eng</p> <p>In the case of Aberystwyth, it did not have enough LANDMAP aspect areas with an overall evaluation of high or outstanding, three being the minimum. It should be noted that in areas where SLAs do not exist, all LANDMAP information will still be a material consideration and that all development will still need to meet the requirements of Policy DM17: General Landscape.</p>	<p>No change</p>
<p>It is useful to note however point 2.5.3</p>	<p>Comment noted.</p>	<p>No change</p>

Summary of representation received regarding the 'Special Landscape Supplementary Planning Guidance' and the 'Open Space Supplementary Planning Guidance' Consultation Jan 2014

Issue Raised by Respondent	LPA Comment	Proposed Change to SPG?
<p>(page 17): 'Where land identified by LANDMAP as being of particular value is not included within an SLA, the LANDMAP information will itself be a material consideration in the determination of planning applications, as required under Policy DM17'. Aberystwyth Town Council will note this when commenting on future planning applications, where appropriate.</p>		

'Open Space Supplementary Planning Guidance (SPG)':

Issue Raised by Respondent	LPA Comment	Proposed Change to SPG?
<p>Comment on 10 bedroom rule – there is a potential loophole here that planning permission can be requested for dwellings with e.g. 2 bedrooms which once purchased or when a purchaser is viewing the property a request can be made or an offer made to split bedroom space to increase the number of bedrooms – not sure how this can be addressed though</p>	<p>It is the right of the homeowner to alter the property internally as they desire. Provided the development has been built according to approved plans, the Local Planning Authority cannot enforce against any internal changes that may happen in the future.</p>	<p>No change</p>
<p>Page 13 Paragraph one, regarding where there is 20 bedrooms or less– a consideration here should be the availability of open space/play space to the development – for example a small scale development with no nearby available play space should still have consideration given to where children will play?</p>	<p>Due to the amount of land available within a smaller development guidance suggests that the overall landscaping of the site should promote sufficient movement and activity.</p> <p>If an existing play space is located next to or close to the proposed new development then the Local Planning Authority will encourage the development of pathways between the new site and the existing open space.</p>	<p>No change.</p>
<p>General comment – can there be anything included about creating playable spaces from e.g. retaining walls such as adding hand a foot climbing holds, paths and walkways encouraging walking and jumping etc. and about 'safe routes' around</p>	<p>The layout and movement of sites will be addressed as part of the Built Environment SPG which is currently being drafted. That SPG is due to be considered by Cabinet and Council, ahead of consultation, this Summer.</p>	<p>Change to the SPG proposed as follows:</p> <p>Section 6 page 14, additional wording to be inserted at end of paragraph 7:</p>

<p>new developments so that the pedestrian and children's play Needs have equal consideration to the car user?</p>	<p>Wording could however be included in the Open Space SPG which would further encourage developers to look at existing features that can be adapted for open space use.</p>	<p>"Developers should assess what existing features can be incorporated into the open space e.g. existing trees"</p> <p>Also insert at end of last paragraph "The Design SPG and Policy DM09: Design and Movement should be taken into consideration when designing the open space, ensuring that routes to and from the open space are safe."</p>
<p>The SPG makes some good points on the need for open spaces and Green Infrastructure and the benefits that they bring to residents of the area. It is useful that open spaces that would be considered 'private', developed for residents of a housing site or office block etc. are included. Aberystwyth Town Council has commented in responses to planning applications on the need for open spaces in such developments.</p>	<p>Comment noted.</p>	<p>No change</p>
<p>Good descriptions of the different types of green space are included, and provides useful suggestions on how these may be provided in new developments (pages 7 - 10).</p>	<p>Comment noted.</p>	<p>No change</p>
<p>Table 1 (open space provision calculation based on the number of bedrooms proposed overall as part of the development) (page 12) provides a useful</p>	<p>Comment noted.</p>	<p>No change</p>

<p>indicator of the type of provision required in a development.</p>		
<p>It can be seen that Natural Amenity Green Space is the type required in smaller developments, and most planning applications in Aberystwyth are for developments of this size (given that there are no undeveloped areas in the town). Any development sites in the town are brownfield sites and it is good to see that developers are required to provide open spaces as part of developments, improving the environment for residents and users. Page 13 includes a useful indicator of how much open space should be provided in a development, according to the size of the development. The principles for designing play spaces (pages 15 - 16) provide a useful guide for developers.</p>	<p>Comment noted.</p>	<p>No change</p>
<p>The benefit that trees bring to the environment and to developments should be covered by this SPG. Even a single tree, when planted in the appropriate location, can improve the local environment significantly and this should be highlighted in the guidance.</p>	<p>Wording could be added to the SPG which emphasises the point that any type of landscaping has a positive benefit.</p> <p>The Built Environment SPG which is currently being drafted will contain a section on landscaping. That SPG is due to be considered by Cabinet and Council, ahead of consultation, this Summer.</p>	<p>Change to the SPG proposed as follows:</p> <p>Section 6, page 14, paragraph 7 insert at the end of paragraph:</p> <p>“Even a small amount of landscaping can provide a benefit to the local environment.”</p>