SNPA ExQ1 Responses

*Please refer to the joint LPA response and/or attached LUC Review Report for further clarification

Question 17.5 – SNPA and NRW raise concerns around under-reporting of significant effects. Please identify specifically where your concerns lie, with supporting reasons for this

This is a long standing concern from the point of view of the National Park, further strengthened by the findings of the LUC in their review of the SLVIA and LVIA. Full information can be found in the report itself, and the joint LPA response however some key points include;

- In terms of landscape character, the LUC disagreed with the finding of non-significant effects on LCA 01 Northern Uplands at PEIR. The ES records moderate (non-significant) effects across the LCA. We consider this should have been classed as significant within the northern part of the LCA, though we accept non-significant effects over the more inland and upland parts of the LCA. We disagree that 'visibility of existing development' within the northern parts of the LCA will reduce the impact, since the proposed development is of a different scale and form to existing development, and would introduce a new characteristic rather than adding to an existing one.
- The PEIR found significant effects at four of these, while we queried the finding of non-significant at VP36 Tal-y-Fan. Effects on the closer viewpoints 12 and 40 are recorded as major- moderate in the ES, with the more distant viewpoints 10 and 38 being moderate. A moderate-minor and non-significant effect is recorded at VP34 Snowdon Summit. The assessment for VP36 Tal-y-Fan is stated to be moderate but not significant. We suggest that, although close to the borderline, this should be identified as significant. We note that effects at VP38 Foel-fras are moderate (significant), on a very similar but more distant view. We highlight an inconsistency in the sensitivity assessment for VP36 that may account for this

Overall however the LUC do conclude that "The remaining areas of disagreement set out above are points of detail and do not represent substantive differences in terms of the likely level of effects. We consider that the SLVIA and LVIA make clear the overall extent of likely significant effects"

Question 17.6 – SNPA's RR makes reference to visual impacts from specific points within the National Park, such as from Carnedd Llywelyn and the Carneddau as a whole. Noting that VP10 is from Carnedd Llywelyn and VP is from Foel Fras;

- a) Is SNPA satisfied that these viewpoints are representative of this part of the National Park (ie the Carneddau); Yes
- b) Does SNPA agree with the Applicant's assessment that residual effects from these viewpoints would be moderate adverse and significant; Agree that these viewpoints in particular would be moderate (significant). As per the findings of the LUC review however we believe that Tal y Fan should also be significant
- c) Does SNPA agree with the Applicant's assessment that residual effects on the SNPA Landscape Character Area (LCA) 02; Carneddau Range would be minor moderate adverse and not significant? In terms of the area/LCA as a whole, yes. Specific viewpoints (ie Carnedd Llywelyn) within the LCA would be 'significant' however (as the authors note).