

Countryside SPG Consultation Responses

Responses are shown in the order in which they were received.

Respondent	Comment	Recommended Response	List any changes recommended by Officer
<p>McCartneys</p>	<p>We have been advertising redundant barns for commercial or tourism use for many years since the policy ES 24 (and GP6 in Powys) was introduced and have never yet managed to find a tenant or purchaser. The proposed low value uses are generally not compatible with the extraordinarily high cost of converting redundant traditional buildings, - and this is especially so in the case of attempting to use them for affordable housing. The marketing exercise is therefore a complete waste of time and money.</p>	<p>As the respondent highlights, the principle of advertising redundant agricultural barns to test the need for defined beneficial uses was first established in the previous development plan for the area, the UDP and has been in use since that time. Since January 2014 we are aware of eight barns which have found a commercial or tourism use and so while we understand that while McCartneys may not have received a positive response to adverts, others have. Indeed in the past year non-residential applications for barn conversions, equalled the number of residential conversion applications. This in itself suggest that such schemes must be economically viable.</p> <p>At the time of the UDP Inquiry the Inspector requested that policy ES24 of the UDP be amended to make it a requirement of all proposals to convert rural buildings to residential use (outside of development limits) to demonstrate that every reasonable attempt has been made to secure suitable commercial, tourism, sport or recreation use.</p> <p>The policy position was based upon National Policy requirements which sought to return redundant barns to economic use.</p> <p>In reviewing the policy position for inclusion within the LDP the Authority could find no evidence to support taking a position contrary to that set out within Planning Policy Wales. And as such adopted a position within CYD LPI in keeping with PPW(2002) as set out below: 7.6.10 Residential conversion of rural buildings which have ceased to be used for industrial or commercial purposes, including agriculture, may have a minimal economic impact</p>	<p>Other respondents have suggested monitoring the number of applications we receive under this policy against the number we received before it to see if the predictions that it will lead to a drop in applications are founded. We intend to do this.</p>

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		<p>and may be detrimental to the fabric and character of historic buildings. Especially in areas where the creation of local employment is a priority, local planning authorities may include policies within the UDP which do not allow residential re-use unless:</p> <ul style="list-style-type: none"> • the applicant has made every reasonable attempt to secure suitable business re-use and the application is supported by a statement of the efforts which have been made; or • residential conversion is a subordinate part of a scheme for business re-use; or • the resulting housing will contribute to an identified need for affordable housing for local need <p>The Authority is satisfied that, when marketing is undertaken appropriately, it provides a suitable method for testing the need for the accepted beneficial uses for a redundant rural building. Without marketing the Authority would be unable to move beyond consideration of the accepted beneficial uses, accordingly we are not recommending a change at this time</p>	
McCartneys	Under the proposed replacement dwellings and extension to dwellings policies, it makes no sense to me that 'in all cases' the increase in size be limited to just 30% of the cubic content. There are bound to be many occasions	<p>The 30% figure, is not arbitrary, it represents the extent to which a house could be extended but still be considered a subordinate part of the resultant dwelling.</p> <p>The purpose of this policy is two-fold, it aims both to protect the nature of the vernacular buildings in the open countryside, and ensure a range of housing types remain available in the housing market to meet local needs. Because the policy position has already been tested at</p>	

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	<p>when a larger increase would make perfectly good sense for all sorts of aesthetic, economic and practical reasons. Why tie everyone's hands with so ridged and illogical a figure? If there must be a figure why not 50% or 60%</p>	<p>Examination during the LDP process it is not the subject of this consultation.</p> <p>Any evidence in respect of the soundness of the policy should be provided as part of any future review of the LDP we are not recommending a change at this time.</p>	
<p>McCartneys</p>	<p>Equally it is also too restrictive to provide no leeway in the policy on the reinstatement of former dwellings. Phrases such as 'no new or enlarged curtilage is required' or 'faithfully reproduces the size number and location of original door and window openings and roof structure', - gives your officers no discretion at all when looking at what might be very logical reasons for minor changes to the original. The policy should be much more flexible.</p>	<p>Please see response above, we are not recommending a change at this time.</p>	
<p>Brecon Beacons Park Society</p>	<p>Paragraph 2.1. It would be helpful to have the reference to the appropriate section in the LDP (2.4) added here.</p>	<p>Agreed – however the appropriate location for the statement would be 2.3</p>	<p>Para 2.3 insert ". (see LDP 2.4 and PPW 9.3.6)</p>
<p>Brecon Beacons Park Society</p>	<p>Paragraph 2.2. Countryside 15 year Future Vision. Again, it</p>	<p>Agreed although correct para reference would be 2.4</p>	<p>Para 2.4 insert (LDP 4.9.3)</p>

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	would be helpful to add the specific reference: LDP section 4.9.3		
Brecon Beacons Park Society	Paragraph 4.1.1 and 4.1.2 These paragraphs should make it clearer that ordinary vernacular buildings that are not of particular architectural, historic or even visual merit make an important contribution to the character of the countryside and should therefore not be demolished and replaced.	The principle described in these paragraphs is to protect vernacular buildings that are of merit, and to enable to redevelopment of buildings which are of no particular merit. The intended outcome is protecting the local vernacular whilst enabling development which provides for an improvement of existing design standards. We feel that the proposed change would imply a limit on development which is not intended here so we do not wish to make this change.	
Brecon Beacons Park Society	Paragraph 4.3.6. Replacement dwellings should also be required to be more sustainable and energy efficient than those they replace and should conform with SP11 Sustainable design and Policy 23.	Development proposals are considered against all relevant policies within the LDP including the policy mentioned.	
CPRW	Paragraphs 4.1.1 and 4.1.2 . Landscape is often enhanced by modest vernacular buildings which in themselves are not listed or of particular merit. These buildings should therefore not be demolished and replaced.	Please see the response to the Brecon Beacons Park Society in response to this matter above.	
NFU Cymru	NFU Cymru believes that the proposals adopt a very	In our view Policy CYD LPI is a permissive policy which promotes appropriate development forms to support a	

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	<p>negative approach and it is our view that proposals as they stand fail to fulfil the Authority's duty to foster the social and economic well-being of local communities and its objective to promote and support sustainable agriculture.</p>	<p>sustainable, working and living countryside whilst upholding National Park Statutory Purposes and Duty (as set out in the Environment Act 1995)</p> <p>The respondent seems to be questioning how the SPG relates to the Authority's statutory duty. The Environment Act 1995 (S62) states 'A National Park Authority, in pursuing in relation to the National Park the purposes specified in subsection (1) of section five of this Act, shall seek to foster the economic and social well-being of local communities within the National Park'</p> <p>This means that the Park's statutory duty should be carried out with the Park's purposes in mind – policies and actions designed to promote social and economic well-being should also aim to conserve and enhance the natural and cultural heritage of the Park and promote opportunities for the public enjoyment and understanding of its special qualities (National Park Management Plan 2010-2015, 1.5)</p> <p>The guidance note provides clarity on the implementation of LDP policy CYD LPI. This policy in itself seeks to implement the Authority's strategy for development in relation to Open Countryside locations. P</p> <p>The intention of the policy is to foster the social and economic well-being of our rural communities by providing for development forms which support sustainable economic development. This position is informed by National Policy. TAN 6 states 'The conversion of buildings which are currently in industrial or commercial use to dwellings may have an adverse impact on the local economy (3.5.1)...Whilst residential conversions have a minimal impact on the rural economy, conversions for holiday use can contribute more and may reduce pressure to use other houses in the area for holiday use (3.6.1).</p>	

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		<p>The policy position has been tested at the LDP Examination in public process and found to be sound in accordance with all relevant legislation and planning policy (test of soundness C2).</p>	
<p>NFU Cymru</p>	<p>The proposals are, in our view, contrary to the Welsh Government aspirations of a 'culture change' and change in attitude away from regulating development towards encouraging and supporting appropriate development using a development management approach as outlined in the recent Welsh Government Positive Planning Consultation. We are also of the view that the guidance is not in keeping with the guidance set down nationally, see Planning Policy Wales (July 2014).</p> <p>We would highlight, for example, paragraph 4.11.10 which states: <i>"In areas recognised for their landscape, townscape or historic value, such as National Parks, Areas of Outstanding Natural Beauty and conservation areas, and more widely in areas with an established and distinctive design character, it can be appropriate</i></p>	<p>We agree with the respondent that the Authority is bound by the requirements of National Policy in the formulation of planning policy and the determination of planning applications. We do not agree that we have deviated from National Policy.</p> <p>Compliance with National Planning Policy forms a key test of soundness in the Inspector's Examination of LDPs. The proposed wording is intended to provide guidance regarding the implementation of policy CYD LPI. As we have already mentioned in a previous answer, policy CYD LPI has been subject to scrutiny during the LDP process and found to be sound (ie compliant with National Policy) by an Independent Inspector appointed by the Welsh Government.</p> <p>We believe that the LDP is compliant with both the quoted statements and ask you to please refer to the following policy and sections of the LDP which we feel meet your concerns:</p> <ul style="list-style-type: none"> Protection of environment – SP3/Policy 1 Local Distinctiveness – Policy 1 Protection of Listed buildings – Policies 15-17 Protection of buildings of local architectural merit – Policy 17 Provision for housing need – SP10 / SP5/Policy 24 Provision for employment need – SP12/Policy 32 Provision for affordable housing need – SP6 / LGS LP2/ 	<p>No change</p>

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	<p><i>to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important. The impact of development on listed buildings should be given particular attention.”</i></p> <p>Further Planning Policy Wales (paragraph 5.1.1) identifies that <i>“the natural heritage of Wales includes its geology, landforms and biodiversity and its natural beauty and amenity. It embraces the relationships between landform and landscape, habitat and wildlife, and their capacity to sustain economic activity and provide enjoyment and inspiration.”</i> In addition, paragraph 5.1.3 highlights that the <i>“key role of the planning system is to ensure that society’s land requirements are met in Wales which do not impose unnecessary constraints on development whilst ensuring</i></p>	<p>CYD LP/ Policy 28/ Policy 30</p> <p>We believe that the NFU have not taken into consideration all relevant sections of Planning Policy Wales in responding to this consultation. For example section 9.3.6 of PPW states, ‘new house building and other new development in the open countryside, away from established settlements, should be strictly controlled, isolated new houses in the open countryside require special justification, for example where they are essential to enable rural enterprise workers to live at or close to their place of work in the absence of nearby accommodation’ (9.3.6). This is further supplemented by TAN 6 which states ‘Where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car. Development not intended to cater primarily for local needs should continue to be located in market towns, local service centres or clusters of smaller settlements where a sustainable functional linkage can be demonstrated and which are accessible by public transport’</p> <p>TAN 23 sets out that where strengthening the economy is seen as a priority objective (as in countryside locations) the LPA can include policies within its development plan which prohibit residential re-use unless</p> <ol style="list-style-type: none"> <i>1. The applicant has made every reasonable attempt to secure sustainable business re-use and the application is supported by a statement of the efforts which have been made; or</i> <i>2. Residential conversion is a subordinate part of a scheme for business re-use; or</i> <i>3. The resulting housing will contribute to an identified need for affordable housing for local need (3.2.2)</i> 	

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	<p><i>that all reasonable steps are taken to safeguard or enhance the environment.”</i></p> <p>Clearly this Policy seeks to enable appropriate development, whilst the draft SPG puts forward a presumption against development. We would ask you to provide information on how your policies ‘square’ with this guidance and suggest the Brecon Beacons National Park Authority should be looking to comply with the guidance of national policy.</p>	<p>The LDP contains within it policy CYD LPI Enabling Appropriate Development. This is a permissive policy which sets out the forms of development that are appropriate in countryside locations in accordance with National and Local Policy.</p> <p>Please note that the purpose of this consultation is not to address the policy position which has already been accepted within the LDP but to consider how it will be implemented through the development management process, we cannot make changes to the LDP position.</p>	
NFU Cymru	<p>Turning in detail to the Supplementary Planning Guidance. We note the ‘Environmental Capacity Approach which “seeks to enable development where it will not have an adverse impact on the natural beauty, wildlife, cultural heritage, natural resources, or community infrastructure of the National Park”. Policy CYD LPI: Enabling Appropriate Development also states that <i>”proposals for development within countryside locations will be required to contribute</i></p>	<p>National Planning Policy limits development in the open countryside to that which is necessary and essential for local need.</p> <p>The Environmental Capacity Approach described in this Policy seeks to ensure that future development enabled through the LDP complies with the National Park Statutory Purposes duty. The spatial strategy is the expression of the Environmental Capacity Approach to development on the ground.</p> <p>The Spatial Strategy has been developed through application of the Environmental Capacity Approach to the consideration of the scale and distribution of development (4.0.1). Within this strategy, countryside locations (the subject of the proposed SPG) are those places which have been assessed to be ‘unsustainable locations for development, without capacity to accommodate growth...in</p>	

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	<p>positively to their countryside setting and enhance the quality of the landscape without adverse impact on the wildlife, natural beauty, cultural heritage, environmental assets or biodiversity of the area”.</p> <p>It is, therefore, most disappointing that despite the above, paragraph 3.1.2 reflects the National Parks intention to restrict the change of use of redundant buildings in the countryside.</p> <p>We refer to paragraph 3.2.5 which puts forward the proposal for an independent body such as the District Valuer to scrutinise the evidence that genuine attempts have been made to market the property. We believe it is excessive to involve the District Valuer in such matters and we seek clarification on who will be required to fund the District Valuer’s fees.</p>	<p>these areas there is a presumption against development in accordance with national policy, unless there is a defined essential need for development’ (4.9.1.1)</p> <p>In keeping with the above CYD LPI sets out the forms of development that would fall within this definition. Rather than restrictive, we believe that the policy seeks to enable appropriate development to support local need.</p> <p>In answer to the specific issue raised by the respondent regarding the independent verification of Marketing Reports by the DVS The involvement of the DVS in the process is established practice and has been used by the NPA since the introduction of ES24 in the UDP. The DVS provide essential, impartial expertise in the process. The cost of this verification is borne by the Authority. The verification is necessary to ensure that the marketing is an appropriate reflection of current market conditions.</p>	
NFU Cymru	We also note in paragraph 3.2.7 the presumption of need for affordable housing on all areas of the National Park,	We agree that redundant barns are often located in unsustainable locations. we suggest that this unsuitability also applies to general conversion to market housing in accordance with National Policy. TAN 6 states ‘where	

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	<p>however, we would highlight that most rural areas are relatively inaccessible and would require more than a minimum wage to live in such locations. The locations are frequently some distance from shops, services and public transport leading to issues of fuel poverty etc. Rural redundant buildings, therefore, do not lend themselves to conversion to affordable housing and the Supplementary Planning Guidance should acknowledge this fact</p>	<p>development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car. Development not intended to cater primarily for local needs should continue to be located in market towns, local service centres or clusters of smaller settlements where a sustainable functional linkage can be demonstrated and which are accessible by public transport'</p> <p>There may be a genuine need for a family to live at a given location despite its relative isolation from services and facilities, eg for the purposes of sustaining a rural enterprise. This position is recognised in TAN 23 (3.2.2)</p> <p>The requested change is contrary to the spirit of the policy and as such it would not be appropriate for the guidance. The guidance does make it explicitly clear that where the applicant can demonstrate that there is no need for affordable housing in the area, then the NPA will consider open market residential barn conversions.</p>	
<p>NFU Cymru</p>	<p>Paragraph 3.2.11 refers to the requirement to pay a commuted sum of 58% of the Acceptable Cost Guidance. NFU Cymru's position has been clear in the recent consultation on affordable housing contribution but to reiterate here, we believe that this will make the cost of development completely unviable. This Policy will result in only the very wealthy being able to fund open market barn</p>	<p>To reiterate the NPA has a permissive policy in relation to the conversion of redundant agricultural buildings to a range of beneficial uses, including (where appropriately evidenced) open market residential barn conversions. Since the introduction of this policy the Authority has received the same number of applications for conversion of barns to the appropriate beneficial uses as it received for residential conversions in previous year. This would suggest that the strategy position is being upheld and the policy is working and that the respondents concerns regarding the potential impacts of the the policy position on the environmental quality of the National Park are unfounded.</p> <p>However we note that there is a potential for the policy</p>	<p>Additional para added at 3.2 as follows</p> <p>3.2 Alternative Proposals</p> <p>3.2.1 There may, however, be material planning considerations (such as issues relating to heritage, ecology, etc.) that outweigh the policy presumption against the open-market conversion of redundant buildings when the possibility of conversion to all other beneficial uses has been tested. In such instances, the onus will be on the applicant to provide a robust justification for any departure from planning policy and a financial viability</p>

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	<p>conversions within the National Park. In the event that there are no viable outlets for barns which are redundant for modern agricultural purposes due to their limited size or cost of repair, the barns will become dilapidated and eventually fall down. NFU Cymru believes that this is in nobody's interest as the landscape will lose the vernacular buildings which make up the character of the National Park. The LDP is based upon the Environmental Capacity Approach. The Environmental Capacity Approach seeks to enable development where it will not have an adverse impact on the natural beauty, wildlife, cultural heritage, natural resources, or community infrastructure of the National Park.</p>	<p>position to impact unduly on the future sustainable management of agricultural enterprise, given that often barn conversions are undertaken to provide an 'affordable' option to members of the farming family on the farm, where the applicant is unable to demonstrate essential need necessary for provision of a Rural Enterprise Dwelling (in accordance with TAN 6). Accordingly it is suggested that some flexibility is defined within the SPG to account for such circumstances</p> <p>Similarly we note that there may be occasions where there are planning matters which could impact on the viability of making an affordable housing contribution, we acknowledge that in these instances some flexibility should be built into the SPG</p>	<p>assessment will be required to demonstrate that all alternative beneficial uses are unviable.</p> <p>3.2.2 A flow chart is provided at Appendix I to illustrate the consideration process of a planning application relating to redundant buildings.</p> <p>3.2.3 If it can be reasonably demonstrated in writing by the applicant to the satisfaction of the NPA that there are significant factors which mean that the scheme is unviable at the target affordable housing contribution, the Authority will seek to verify this using the 3 Dragons Development Appraisal Toolkit (DAT) (or equivalent process in operation with the NPA at the time) with a final recourse to the District Valuer or equivalent viability assessor.</p> <p>3.2.4 Disputes of viability referred to an independent valuer will be charged at cost to the Developer. Affordable housing will still be required at a level proven to be viable through the above verification process.</p> <p>Additional para added at 3.3.10 as follows</p> <p>It will often be the case that farmers/landowners may wish to convert these buildings in order to provide accommodation for family members. Accordingly, in instances where a converted barn would provide a dwelling for a child (including spouse and residing dependents) of</p>

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			the farmer, the Authority would delay the requirement for the relevant commuted sum payment until such time that the converted barn is sold on the open market.
NFU Cymru	NFU Cymru believes that the abandonment and dereliction of traditional farm buildings will result in the loss of significant habitats for bats and owls which are protected species. It would be far better from an ecological perspective to convert such barns to dwellings and condition the permission to provide mitigation habitats.	Please see response we do not accept that the policy position is likely to result in the abandonment of barns to the detriment of wildlife habitat.	
NFU Cymru	<p>Further, we note, under this paragraph, that any commuted sum payable shall be held in an earmarked reserve by the Authority to facilitate the provision of Affordable Housing in the National Park.</p> <p>In our previous consultation response we expressed concerns over the lack of clarity as to how the reserves generated through collection of commuted sums will be administered and managed. We would highlight that the</p>	The procedure for the administration of affordable housing commuted sums held by the National Park Authority is set out in Appendix 6 of the Adopted Affordable Housing SPG and we feel is addressed sufficiently in that document. The purpose of the fund is to pump prime the construction of affordable housing by Registered Social Landlords within the National Park Area.	

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	<p>phrase in this consultation is very loosely termed and 'facilitate' could be held to mean many things besides the actual construction of affordable housing. We seek clarification that the fund will be ring-fenced for construction and not the wide range of other matters that 'facilitate' could potentially relate to.</p>		
<p>NFU Cymru</p>	<p>We refer to section 3.3 relating to curtilage area and would highlight that if the National Park Authority is, in fact, serious about the provision of affordable housing then a safe curtilage for the dwelling should be a priority. Many people eligible for affordable housing have young families and farmyards and the countryside can be dangerous places with heavy machinery and livestock in fields. A traditional form of boundary is essential for this reason.</p>	<p>Application of this issue is a specific design matter and will be judged on a case by case basis. However the NPA would expect residential conversions to respect the traditional vernacular and its appearance within the landscape in their approach to boundary definition. Vernacular forms of building form a significant feature within the landscape and should be conserved wherever possible.</p> <p>This position is supported by para 3.2.3 of TAN 23 which states, 'if the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply'.</p>	
<p>NFU Cymru</p>	<p>We note NPA proposals to consider the relevant guidance from CADW where it is proposed to convert a listed building. We would highlight</p>	<p>In line with National Planning Policy the protection of a listed building is a material planning consideration and as such will be taken into consideration in the determination of such applications. Only where it can be proven that the viability of listed building conversions prevents the</p>	

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	<p>again that it will be almost impossible to convert a barn to affordable housing accommodation due to costs. The additional implication of barn conversions with Listed Building status will be totally prohibitive. There is no doubt that the vast majority of listed buildings will fall into disrepair as a result of these proposals. NFU Cymru believes that this action cannot be considered as preservation of the landscape and nature of the National Park.</p>	<p>application meeting policy requirements, will due consideration be given to the merits of conserving the listed building over and above the ability to provide for the affordable housing need. Could NFU note that since April 1 2014 we have approved nine conversions under this policy suggesting that the affordable housing element may not be as off-putting as NFU suggest.</p> <p>However, issues of viability are noted and accordingly we are recommending changes to the SPG to set out a procedure for testing viability where there are sufficient planning considerations to warrant such a policy exception. The proposed text of the change is set out above.</p>	

NFU Cymru	<p>With respect to replacement dwellings, we note that in instances where the replacement dwelling is over the established threshold of 30% and has a significant impact on the housing range within the area, the application will be refused and we would seek clarification as to what is meant by 'significant impact' and as how an accurate and objective assessment can be made? We express concern that the determination of 'significant impact' will be based on the personal, subjective views of individual planning officers.</p>	<p>Consideration of the housing need within the area is undertaken with reference to the relevant local housing market assessment and the Census returns relating to the current offer of housing within an area. There is a significant gap between rural wages and house prices within the area. This policy position seeks to prevent smaller more affordable housing stock (relatively speaking) being removed from the market through excessive extension to form larger less affordable houses.</p> <p>It is our intention to form further SPG on this matter. As with all planning matters our team of professional planning officers will be required to take decisions interpreting the policies, we feel that this is an appropriate role for our officers. Should applicants feel they have been treated unfairly the</p>	
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		officers' decisions will no doubt be scrutinised at appeal.	
NFU Cymru	With respect to extensions to dwellings we also seek information from the National Park Authority on how it proposes to go about considering the impact of a house extension on the local market. Please advise whether each extension proposal will be subject to this level of scrutiny and how this work will be funded.	Please see response above. This work is currently undertaken within the Authority and will continue to be. At present there is no intention to look to applicants to fund any assessment.	
NFU Cymru	Finally on the issue of the reinstatement of former dwellings and the issue of curtilage we would highlight that many former dwellings have been neglected and the curtilages destroyed by grazing livestock. It is vital that the reinstatement of the former curtilage is permitted or an appropriate sized curtilage is allowed. It would have been very unusual for a traditional rural dwelling to have no curtilage boundary as occupants would have been reliant upon garden produce for food.	Please see previous response in relation to curtilage of renovations. This will be considered on a case by case basis, with the presumption that traditional boundary treatments and curtilage size will be upheld.	
NFU Cymru	We express concern at paragraph 6.2.1 which will mean that any abandoned dwelling either has to become a rural enterprise dwelling or remain unused and become a ruin. We would also reiterate that former dwellings and barns are important habitats for bats and barn owls. The logical outcome of your policy for development in the countryside will result in very little conversion of redundant buildings taking place. These buildings will inevitably decline and become ruins, their use as habitats for such biodiversity is bound to diminish over time as a result of your policy. We also note that low and zero carbon technologies, where they are found to be applicable, must be employed within the scheme. We would highlight that the word 'must' implies that such schemes would over-ride any landscape or Listed Building objections and so some guidance and clarification is required.	As per National Policy direction the strategy recognises that development in the countryside should be limited to those forms of development which fulfil an essential local need. As such, redundant dwellings will be considered against policy CYD LPI, criteria I (b). As we have already mentioned the evidence we have seen suggests that the policy will not restrain development of redundant buildings. Our database of planning applications suggests that this is not the case and that such buildings will be used in accordance with permitted beneficial uses. The conservation of a listed building will be given due consideration within the determination process. Please see proposed changes listed above.	

<p>NFU Cymru</p>	<p>Overall, NFU Cymru believes that the SPG will have a long term impact on development within the National Park boundaries. It is vital that this is subject to annual review and that the draft SPG is amended so that it is robust enough to facilitate any changes that are needed. The charges associated with such development in the countryside should be transparent and made available, and clear guidance should be offered at the pre-application stage so that applicants are able to determine from the outset if their project is viable.</p>	<p>We welcome NFU Cymru's observations. but , for the reasons given above, we still feel that this policy will not impact adversely on development rates within the National Park however we agree with the NFU Cymru that we will monitor this. The policy position seeks to ensure that the reuse of redundant barns contributes to a sustainable future for the rural economy in line with Welsh Government policy. As stated within TAN 6 'The conversion of buildings which are currently in industrial or commercial use to dwellings may have an adverse impact on the local economy (3.5.1)...Whilst residential conversions have a minimal impact on the rural economy, conversions for holiday use can contribute more and may reduce pressure to use other houses in the area for holiday use (3.6.1). We do agree however that there is a need to monitor the application of this policy and will be seeking amendments to the monitoring framework (set out in Chapter 11 of the LDP) accordingly.</p>	<p>Officers are considering amendments to the Monitoring framework to include indicator relating to number of applications received and permitted for redundant rural buildings.</p>
<p>Cllr J Morris</p>	<p>Having had a number of concerned professional people contact me recently I object in principle to the SPG . In my view this has huge negative knock on effects to residents and businesses in the national park. I would request that a meeting is arranged by the park authority with organisations and representatives within the area .. Inc CLA, NFU,FUW, planning agents county councils AMs and MP and councillors with wards in the park.</p>	<p>Unfortunately, we cannot act on first principle objection to a point of policy since the policy has already been agreed during the LDP Examination. The Policy and the LDP have since been found sound and have already been adopted by the Authority. For information a meeting was held between the Authority and NFU, FUW and CLA during the consultation period to discuss issues relating to the policy now under consideration. A further meeting was organised for November, And there after twice yearly with an option for additional meetings if requested . The Authority has contacted Roger Williams MP and Kirsty Williams AM offices to</p>	<p>No change</p>

		arrange a mutually convenient meeting date.	
Roger Williams MP	<p>I would like to object to Paragraph 3.2.12 of the above document in terms of the commuted sum contribution that should apply to barn conversions. As I understand it, there have been no permissions for barn conversions this calendar year in the National Park area. This I believe reflects the exceptionally high commuted sum contribution that is now required.</p> <p>In terms of the purposes of the National Park to conserve the beauty of the countryside then the local and traditional architecture of farm buildings I very important. If it is financially unviable to convert these buildings they will fall into disrepair and their contribution to the landscape will be lost. I think there should be a reconsideration of the commuted sum to ensure the maintenance and good condition of barns within the National Park.</p> <p>I would also like to support Cllr John Morris's request for a meeting to discuss this further with other interested parties.</p>	<p>The Authority has a permissive policy in relation to the conversion of redundant agricultural buildings to a range of beneficial uses, including, where appropriately evidenced, open market residential barn conversions. Since the introduction of this policy the Authority has received an equal number of applications in accordance with this policy (ie for conversion of barns to the appropriate beneficial uses) as it received for residential conversions in the previous year which we feel suggests that the policy is not prohibiting development with the resultant issues for environmental quality</p> <p>In relation to the 'reasonableness' of requiring financial contributions in lieu of affordable housing provision. This issue relates directly to national planning policy, and the uses which are considered essential and necessary to support local need. To reiterate, at the time of drafting the LDP Planning Policy Wales explicitly stated the beneficial uses to which barn conversions could be put. This does not include open market residential conversions. Since this time PPW has been through various iterations, and although this statement has been revised, there remains no support within the text for open market residential barn conversions. We take this to mean that such proposals should only be provided for in exceptional circumstances where the potential for all other beneficial uses have been exhausted and where mitigation for the impact of the identified use is provided.</p> <p>Where an applicant seeks to convert a barn to a use which the Policy does not recognise as necessary or essential, such as open market</p>	No change

		<p>residential conversions, the Authority makes some provision to permit this, where an equivalent benefit can be provided off site to mitigate for the impact on the local housing market. It is considered reasonable that this provision should be equivalent to the provision of an affordable unit, as this is perceived as the extent of the loss.</p> <p>As with all required planning obligations, the charge becomes a charge on the land, and land values will be adjusted accordingly.</p> <p>The Authority has met with Roger Williams MP to discuss these matters, and provided his office with supporting evidence.</p>	
Talgarth Town Council	<p>3.2.12 This clause is proposing to raise a 58% commuted sum as levy on conversions. This seems totally disproportionate to anything else . This is also the first time the public have been consulted on this kind of percentage and it was certainly not part of the LDP consultations.</p>	<p>As stated above, CYD LPI outlines the beneficial uses to which a redundant rural building can be put, based on national policy objectives. We would like to reassure Talgarth County Council that in fact this policy was consulted upon through various iteration of LDP production and accepted after further discussion at public examination. Please refer to The LDP Consultation Report for more information.</p> <p>The policy of the LDP prevents open market conversion of barn conversions. This is because we do not want to lose economic generating development from rural locations. The only form of residential development that could be considered acceptable to account for such a loss would be for affordable housing / rural enterprise dwellings, for which there is overwhelming need across the National Park. However, the SPG makes some provision where an applicant wants to convert a barn to open market housing. It sets out</p>	

		<p>how such a scheme could demonstrate policy complacency, ie contribute towards the need for affordable housing. In this instance, it is considered the most acceptable alternative to on-site provision would be made by way of financial contribution which could then be utilised by the NPA for provision of affordable housing within the National Park within the locality. In order for such a contribution to meet the identified need, it must be provided as a like for like equivalent to onsite provision, that is at 100% of 58% of ACG. In other words, if an RSL were to purchase the property for Affordable Housing they would provide 42% of ACG, the developer would be responsible for the remaining 58. In exceptional circumstances (as set out above) there may be material planning considerations which would enable a reduction in the level of contribution payable, however this would be subject to viability assessment. These changes have been proposed previously.</p>	
<p>Talgarth Town Council</p>	<p>3.1.1 In addition to the above the SPG seems to be about strengthening the policy's constraints by adding more constraints. It does not allow for flexibility. The aim of combining Policy CYD LPI with the proposed SPG seems to be about ending the conversion of farm and other buildings for open market housing altogether ? The authority may have reasons, but the public were not privy to those opinions or openly consulted about this during the LDP construction. Therefore the situation we are now in, seems to have been arrived at by stealth. What seems to be missing from this present guidance is an approach to enable the conservation of rural buildings. Many of these buildings are an important part of our landscape and cultural heritage. Due to a weak rural economy and high development costs it now seems more than likely that many of these</p>	<p>The guidance note is intended to provide detail on the implementation of the adopted policy position. The policy position has been in the public domain since May 2010. We believe that it does not, as asserted, introduce new policy or greater constraints on the application of the policy. The adopted policy seeks to enable the re-use of redundant rural buildings for a range of beneficial uses which support a sustainable economy/provide for the most in need of our communities. This policy position is in line with Welsh Government's National Policy objectives for the countryside. The guidance provides mitigation process whereby applicants can seek other non-listed uses from redundant rural buildings where evidence is presented to support such an application.</p>	

	<p>historic buildings will dilapidate and fall down, if a more flexible approach to this problem is not instigated.</p>	<p>We believe that the policy is permissive and will enable and support many options for the sustainable re-use of redundant building. The NPA has received applications in keeping with the policy position and we are satisfied that this will not lead to the dereliction of the National Park's landscape.</p>	
<p>David James RHE Monmouthshire</p>	<p>2.2. This suggests that previous development, for example a barn conversion, has not made a positive contribution to the countryside of the BBNP. I would argue to the contrary. Barn conversions are the utilisation of brown field sites and if not converted would more often than not completely deteriorate. When these buildings are brought back into use as private dwellings, land is often brought back into use as well and other neglected areas such as hedgerows and stone walls are repaired and managed once again. In addition to providing a dwelling where an existing building stood, local people are employed using skilled labour. Local materials are also often used which has a very positive effect on the local economy. For example, many of the barn conversions use lime mortar supplied by Ty Mawr Lime and if these buildings had not been converted there is little doubt that Ty Mawr and many other local businesses may not have existed. The landscape of the BBNPA is a well managed landscape and without people living in it who care about their surroundings it will deteriorate.</p>	<p>An interrogation of our planning application database has revealed that we have received at least 10 applications for barn conversions since January of this year. The applications referred to mainly propose the listed beneficial uses as set out in CYD LPI. Policy CYD LPI enables beneficial uses such as tourism, sport, commercial, recreation, rural enterprise dwelling and affordable housing. Based on our evidence that applications have in fact been submitted proposing such beneficial uses, and are therefore viable options for barn owners (and prospective purchasers)</p>	
<p>David James RHE Monmouthshire</p>	<p>3.1.1. It is questionable if a commercial, sport, tourism or recreation use of a building provides the same level of benefits if a building is used as a domestic dwelling. For example, if a building is used for recreation use it may be the case that the building is in an isolated location so private transport would have to be used to access it and this could create many additional car journeys on roads that might be single track and unsuitable for a heavy increase in traffic. Although there is a need for affordable</p>	<p>As set out in TAN 6 (2.2.3) 'Where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car. Development not intended to cater primarily for local needs should continue to be located in market towns, local service centres or clusters of smaller settlements where a sustainable functional linkage</p>	

	<p>housing in the vast majority of areas within the BBNP, that fact alone does not make the use of redundant buildings for affordable housing the best use. The size, type and location of a building will determine if it would be suitable for affordable housing, but in my experience for the vast majority of these buildings they would be far from ideal and highly unlikely to be able to meet the Welsh Government requirements of DQR and Lifetime Homes Standards.</p>	<p>can be demonstrated and which are accessible by public transport'</p> <p>Similarly, 'The conversion of buildings which are currently in industrial or commercial use to dwellings may have an adverse impact on the local economy (3.5.1)...Whilst residential conversions have a minimal impact on the rural economy, conversions for holiday use can contribute more and may reduce pressure to use other houses in the area for holiday use (3.6.1).</p> <p>Moreover the issue of the traffic generation and sustainability will differ on a site by site basis and in accordance with the proposed beneficial use. We do not feel that the variation in level of trip generation is in itself significant enough to warrant amendment to the entire policy position. It should be noted that this argument could equally be against the sustainability of enabling residential barn conversions where the future inhabitants will be entirely dependent on private transport for all their needs. This brings us back to National policy objectives for sustainable rural development and the need to uphold them within the Brecon Beacons National Park.</p>	
<p>David James RHE Monmouthshire</p>	<p>3.1.2. See response to 3.1.1.</p>	<p>As above</p>	
<p>David James RHE Monmouthshire</p>	<p>3.2. This is extremely onerous, but more worryingly, subject to a BBNP officer's own judgment whether the marketing exercise has been sufficient or not. How can a policy that is subject to individual interpretation be fair to all applicants?</p>	<p>The assessment of planning applications in any Planning Authority is always undertaken by professional officers. These officers are trained to act in the public interest. The marketing exercise is subject to DV scrutiny which aids the informed decision the officer takes. There is an appeal process available to anyone who feels they have not been dealt with in accordance with planning</p>	

		policies.	
David James RHE Monmouthshire	3.2.9. As well as the applicant it is vital that the BBNPA officers liaise with the relevant local authority affordable housing officer and take note of what they say, as they are the ones with the housing expertise. At this stage a conversation with the affordable housing officer would determine if the property is suitable for use as affordable housing and a decision can be made quickly to proceed or not as the case may be.	<p>The process defined within the SPG explains that the applicant would need to provide a report of all efforts that have been made to utilise the redundant building for all listed beneficial uses, including affordable housing use. These findings will be taken into consideration in determination of any proposal for a non-listed beneficial use.</p> <p>As stated within the SPG the assessment made by the Strategic Housing Officers and/or Registered Social Landlords will form key evidence to this determination.</p> <p>Where such evidence is provided in support of an application at validation stage, there should be no reason why an application couldn't be determined within the target 8 weeks.</p>	
David James RHE Monmouthshire	3.2.11. How can this be justified? When I first raised concerns about the BBNPA LDP back in June 2010 my biggest concern was about the commuted sums being proposed and the impact that would have on development. This policy asks for more than £100,000! I have already been approached by people wishing to convert a property for their own use and they have been quoted affordable housing contributions of more than £100,000. If this policy is introduced it will lead to an overall increase in the price of existing rural properties within the BBNP, taking them out of reach for the vast majority of residents and they will therefore likely end up as second homes to wealthy people living elsewhere in the UK. The idea that the BBNPA should hold the money when they do not have the necessary housing expertise to strategically allocate efficient use of the funds does not make sense.	<p>The respondent made similar points at the LDP Examination . As the LDP has been found sound at the examination stage, the NPA, and the WG are satisfied that there will be no adverse impact on development rates as a result of the adopted policy. Since the adoption of the LDP our evidence to date suggests that the concerns raised are unfounded. There has been no impact on application or development rates. Rather the development coming forward is meeting the objectives of the adopted strategy (which are in line with National Policy objectives).</p> <p>We have evidence to suggest that the majority of residential barn conversions enabled under previous policy regimes are undertaken by people living off site, whereas conversions to listed beneficial uses (excluding Affordable Housing) are undertaken by people living on site. This suggests that a permissive policy relating to residential barn conversions does not in itself provide for the</p>	

		<p>resident population, and may simply cater to 'wealthy people living elsewhere in the UK'.</p> <p>The NPA will consider any evidence the respondent can supply to feed into the programmed review of the LDP.</p> <p>The procedure for the administration of affordable housing commuted sums held by the National Park Authority is set out in Appendix 6 of the Adopted Affordable Housing SPG. The purpose of the fund is to pump prime the construction of affordable housing by Registered Social Landlords within the National Park Area. This issue is addressed sufficiently in the Affordable Housing SPG.</p>	
<p>David James RHE Monmouthshire</p>	<p>3.2.12. This does not take into account the high costs of converting a property. In the Pembrokeshire NP, I believe the commuted sums expected on conversions are equivalent to half the normal rate as they realise the costs are significantly higher than to build a new property. I note there is no reference to the use of the Development Appraisal Toolkit (DAT) to evaluate the viability of conversions. This is used effectively in Monmouthshire and is ensuring delivery of rural development and bringing in substantial commuted sums to be used for affordable housing. The BBNPA will fail to deliver any rural residential development and therefore will not bring in any commuted sums. (With the DAT is the BBNPA paying for the it to be updated? Build costs are rising very quickly and it is vitally important that the DAT reflects this)</p>	<p>To reiterate, the strategy position is that the majority of development within the National Park should be located in sustainable locations. These are listed as settlements within the LDP and in these locations Policy 28 Affordable Housing Contributions apply. The use of the Development Appraisal Toolkit is employed in the implementation of this policy, is bringing significant contributions to the Authority which will be utilised to deliver affordable housing in areas of need. We work closely with our Affordable Housing consultant, and have tailored the toolkit specifically to take account of the specific policy requirements of development within the NP. This is updated regularly paid for by the Authority.</p> <p>It is considered that development within defined settlements, and allocated brown field sites will provide sufficient housing land to meet the identified need. As such the LDP strategy sets a presumption against development within</p>	<p>No change</p>

		<p>countryside locations, unless there is a defined essential need for such development. The LDP sets out that development in countryside locations is less sustainable and more environmentally challenging than is considered acceptable. As such it is the vision of the LDP to increase the viability and diversity of rural practice, including supporting farming practice to engender a more vital future for our countryside. As such the loss of agricultural buildings from economic generating activity to non-economic generating activity is not supported by the LDP. The only acceptable exception to this position is if the development would be to meet an identified need for affordable housing or rural enterprise as this form of development is considered to be in keeping with the vision for the creation of a sustainable vibrant and vital countryside. This strategy position is implemented through policy CYD LPI criterion I(b) which states:- outside of defined settlements within the LDP the following forms of development will be permitted subject to all other relevant LDP Policies :- (1) Proposals that capitalise on improving the existing building stock and/or utilises previously developed land and/or re-uses redundant buildings, including (b) Proposals to re-instate redundant buildings to the following beneficial uses (i) Commercial, Sport, Tourism or Recreation use OR (ii) Affordable housing to serve an identified need or (iii) The proposal will provide a Rural Enterprise Dwelling to serve an evidenced essential need. Only in cases where evidence can be provided to the NPA that the need for conversion to the above uses does not exist within the locality will the NPA consider proposals to reinstate redundant buildings for use as open market housing.</p>	
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<p>David James RHE Monmouthshire</p>	<p>3.4.1. See 3.2.9. If the applicant has spoken to the local authority affordable housing officer and they have confirmed it is not suitable for affordable housing and have then relayed that information to the BBNPA planners there should be no need to raise this matter at the pre-application stage.</p>	<p>Please see response to previous comments on this matter.</p>	
<p>David James RHE Monmouthshire</p>	<p>4.1.1. There should be consideration over the type of building being demolished and an acceptance that a house needs to be of a minimum size to provide adequate living accommodation. If the building to be demolished is very small than the Welsh Government minimum space standards for affordable housing should apply to the replacement dwelling.</p>	<p>As we are not bound to apply such standards to open market dwellings, we would suggest that we have no grounds to apply this requirement in this instance.</p>	
<p>David James</p>	<p>4.1.4. I do not think the BBNPA is sufficiently qualified to</p>	<p>The respondent will be aware that the Authority</p>	

<p>RHE Monmouthshire</p>	<p>comment on the housing market when it does not have a responsibility for housing and fails to regularly consult, communicate and take note of the expertise of the relevant local authority housing staff. There is no Rural Housing Enabler working in the Powys area of the BBNP and without this expertise there will be a dearth of evidence for officers to use. For example, 4.1.4 seems to imply that a 2 bedroom property in a rural location would be affordable for someone on local wages. Apart from the Heads of the Valleys area of the BBNP there is no bottom end of the market in rural areas and even 2 bedroom properties are out of reach for many local people. Currently the south east of Powys within the BBNPA, the lower quartile house price to income ratio is 11.37 i.e. someone on lower quartile income would need 11.37 times their income to be able to afford a lower quartile priced home. Around Brecon the rate is 10.95.</p>	<p>has organised numerous workshops and meetings with our colleagues in strategic housing departments, ensures that SHO are consulted at pre-application stage of all development within settlements and that RSLs form key part of the marketing process for barn conversions. He will also be aware that the Authority is working with our partners in housing to develop a strategy for the delivery of affordable housing across the National park area. The NPA made a decision some time ago that the RHE role as currently modelled had served its purpose in the National Park area and that further funding contributions could not be justified in the prevailing financial climate and based on evidence of outcomes..</p> <p>We welcome the evidence provided to the Authority relating to the house price to income ratio, and would suggest that it is even more reason to increase options for the delivery of economic generating development and affordable housing to meet the obvious needs in the area. In response to the specific issue raised by the respondent in relation to NPA expertise to judge planning applications, such an assessment is made utilising the LHMA and Census data. Given the respondents evidence, it would be thought that efforts to maintain a range of housing types and sizes to meet a range of local incomes would be welcomed. The wording of 4.1.4 makes clear that a 2 bed house is ‘relatively’ more affordable than larger outcomes.</p>	
<p>David James RHE Monmouthshire</p>	<p>5.1.2. This mentions the primary consideration is that the “National Park’s rural landscape is not harmed by the loss of its vernacular buildings”, but the SPG is likely to cause many buildings to deteriorate and fall into a state of</p>	<p>This issue has been previously discussed. The NPA has no concern relating to the loss of vernacular building. CYD LPI provides options for the beneficial re use of such buildings, and the evidence</p>	<p>No change</p>

	disrepair and decay. This is a contradictory statement to the policy being introduced!	would suggest that the market is following the policy position.	
David James RHE Monmouthshire	5.2.1. See 4.1.4.	See previous response	No change
David James RHE Monmouthshire	6.1. There was much debate in the LDP Hearings about the previous rate of windfall developments within the BBNPA and these were included and used as justification for the amount of land allocated for development. There is little doubt that when the monitoring of the rate of delivery of housing in the BBNPA is undertaken, there will be a very big shortfall because windfall development will almost be non-existent.	The NPA is confident that there will be no impact on housing delivery as a result of CYD LPI. The Authority does not rely on barn conversions to meet development rates. Out of the 83 new dwellings granted planning permission last year (prior to the adoption of the LDP,) 10 were for residential barn conversions. The loss of these from the overall land supply is not a concern, especially given the potential benefits to the rural economy to be gained from implementation of CYD LPI as set out.	No change
David James RHE Monmouthshire	<p>Within the Landscape and Development Draft SPG Appendix 3 Area Profiles, Page 31 of 93, Forces for Change one of the bullet points states – High-quality conversion of redundant agricultural buildings to residential use, but a policy is now being introduced which will scupper this in future!</p> <p>As has happened previously, a policy is being consulted on by the BBNPA which has been developed in isolation without sufficient consultation with experts and the constituent local authorities which fall within the BBNPA. It would be far better to consult extensively during the formulation of policy and put it in order before it goes out for public consultation than consult on something with so many fundamental flaws it is difficult to see the merits of what it sets out to achieve.</p> <p>Since the LDP has been adopted I wonder if any residential conversions have been granted planning</p>	<p>The quoted guidance should be reconsidered in the context it was originally written. The respondent refers to a landscape character assessment of the National Park undertaken in 2011 which identifies ‘past and present’ forces for change within the landscape and the respondent then identifies the impact of residential barn conversions on the landscape. The LDP contains policies which will allow the appropriate re-use of barns.</p> <p>Policy CYD LPI has been through extensive public scrutiny, has been consulted upon in various iterations of LDP production since May 2010. The respondent made representations to the Authority during the many consultations and attended various hearing sessions of the examination. The policy position of the LDP is a clear translation of National Policy and objectives for the sustainable development of the countryside. The policy and</p>	

	<p>permission, because from my knowledge of working within the Monmouthshire area of the BBNP I am not aware of any.</p>	<p>the LDP have been found sound following rigorous examination in public.</p> <p>As stated to other respondents, the Authority has permitted various applications for barn conversions since the adoption of the LDP. The uses of which comply with the stated policy position. It is not the objective of the LDP to bring forward open market development in countryside location, it is not a concern that there have been no residential barn conversions, rather we are satisfied that this is evidence that the policy and strategy to enable the economic re-use of redundant barns is working</p>	
NRW	<p><u>Section 3.2.2 Application Requirements - Marketing</u></p> <p>We have concerns with the SPG proposal that applicants will only be required to market the building for a period of 6 months. In areas where the property market is quite slow, or during a period of economic difficulty, which is likely to result in a slowdown of the property market, it may be difficult to sell a property for particular uses. However, this may not be a true reflection on whether or not such a development is viable at those locations, but instead reflect the economic circumstances at the time of marketing. We therefore suggest that it is more appropriate to market the building for 24 months which will allow a more realistic timescale to market properties in difficult circumstances and provide greater certainty on whether or not the building is actually viable for the uses identified in LDP Policy CYD LPI.</p>	<p>The Authority note NRW's comments, however, as stated in response to similar comments made to the LDP, the NPA is satisfied that a 6 month period provides enough detail to meet policy requirements.</p>	No change
NRW	<p>Redundant buildings in the countryside can frequently provide roosts for protected species such as bats. Pre-application discussions between developers and the Authority should also therefore involve the Authority's</p>	<p>We believe that these issues are satisfactorily dealt with in both the LDP, supporting SPG (draft and adopted) and the guidance note itself.</p>	

	<p>ecologist to provide advice on any potential protected species survey requirements. Landscape considerations should also be identified at the pre-application stage to inform the design of the proposed development. We therefore suggest that the SPG clarifies that biodiversity and landscape considerations will also be considered at this stage.</p> <p>We welcome the recognition of the potential presence of bats in former dwellings (Section 6.2.2) as a consideration, and the reference to the requirement to comply with Policy 7 (Protected and Important Wild Species) of the LDP. A reference to bats as a consideration should also be added to sections 3.0 The Conversion of Farm and Other Buildings to Dwellings, 4.0 Replacement Dwellings, and 5.0 Extensions to Dwellings, as all these proposals have the potential to affect structures used for roosting by bats.</p>		
<p>AB Planning</p>	<p>As a fundamentally overwhelming critical point, the Draft SPG appears to have been formulated without key meaningful interaction and pre consultation input from the BBNPA rural partners/consultees such as:</p> <ul style="list-style-type: none"> • National Assembly Member/s • Local Members of Parliament • Small Business Federation • Country landowners Association • Farmers Union of Wales • National Farmers Union • Rural Housing Enablers • RSL's • Housing Departments of partners LA's • Rural property specialists and valuers 	<p>As a planning agent, the respondent is presumably aware that the guidance note provides implementation on an adopted policy position. The LDP is the product of extensive consultation, and public scrutiny, including consultation with all of the listed bodies stated in the respondents response.</p> <p>Our records shows that all of the listed groups and individuals were consulted at various stages of LDP Policy development and had the opportunity to and in some cases, did attend the Examination sessions . The policy and the LDP have been found sound and adopted.</p>	

	<p>In relation to the later, a number of expert practitioners operating within the BBNPA area gave evidence to the LDP enquiry, stating that the application of the less onerous formulae regarding affordable housing contributions would cause increases in property costs and a reduction in housing supply. The context of the current affordable housing levy being introduced without clear and open debate at the public enquiry through this SPG would have obviously been resisted by these local experts.</p>		
AB Planning	<p>Basic rules of cost appear to be missing, including residual cost analysis - for example the current guidance appears to disregard the possibility and additional cost implications of funding the conversion of a listed building.</p> <p>The policy/SPG does not have regard to status such as a building being on a Local List.</p> <p>The Policy has no regard if the Building is 'At Risk' or a key building within a Historic Park and Garden. In fact the policy/SPG has no logical testing against the most basic planning designations or economic logic.</p>	<p>As previously stated in response to NFU, the protection of a listed building is a material planning consideration and will be considered in the round in the determination of such applications.</p>	No change
AB Planning	<p>As part of the LDP hearing process external experts stated, for example, that the number of applications for the conversion of barns to dwellings would reduce with the application of the less punitive 'Policy 28' approach to calculating the appropriate affordable housing contribution.</p> <p>It is reasonably predictable that only the elite housing market is likely to proceed to development with a levy that will amount in some cases to considerably more than £100K in relation to larger barn conversions in open countryside.</p>	<p>The LDP strategy aims to limit development in countryside locations to that which can be proven to be necessary and essential in accordance with local need. This position is taken from National Policy objectives regarding sustainable development strategy. 4.7.8 of PPW states 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation...new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled'</p>	

		<p>Policy 28 seeks to ensure that development within sustainable locations provides a proportional contribution towards affordable housing need. As The discussions at the Examination hearing sessions suggested that it would be inappropriate to apply Policy 28 to the Countryside, as the presumption is that all new residential dwellings in the countryside will be for affordable housing.</p> <p>Since the introduction of the policy the Authority has seen an equal number of applications to convert redundant agricultural buildings as the same period prior to adoption. We have been happy to note that the uses applied for are compliant with policy CYD LPI. This suggests the contrary to that which the respondent envisions, and in fact the policy is enabling economic uses for barn conversions to come forward over and above residential conversions, which will allow for the sustainable development of the rural economy for our constituent communities.</p>	
AB Planning	<p>The above context, of discouraging the residential conversions of barns, appears additionally irrational when considered against the parallel landscape related SPG consultation that reports the significant historic success of the BBNPA area involving high quality residential barn conversions.</p>	<p>The guidance note does not state that there have been ‘ significant historic success of the BBNPA area involving high quality residential barn conversions.’ Rather the LCA notes that there is a change in the landscape derived from agricultural practice which sees barns being repurposed for residential use and the landscape impact such development can have.</p> <p>National Policy TAN 23 states it is reasonable to prohibit residential barn conversions where there are economic objectives to do so.</p> <p>The NPA does not in fact prohibit such</p>	

		<p>conversions, but rather makes provision to such exceptional development only when the identified local needs can be provided for through equivalent financial benefit.</p>	
AB Planning	<p>Should this SPG progress to the stage of the Parks members considering the evidence around and implications of the SPG and the aggressive application of the affordable housing aspiration within it, during the post LDP adoption period (assuming they are genuinely interested in scrutiny), they should consider:</p> <ol style="list-style-type: none"> 1 how many market housing conversion permissions there have been since the application of the higher affordable housing levy in open countryside and 2 how many affordable dwellings have been created via the conversion of a rural building 	<p>Members will be aware that there have not been any planning permissions granted for residential barn conversions (affordable or market) since the application of the policy in December 2013, there have been permissions granted for the listed beneficial uses enshrined within their adopted policy.</p> <p>Pre-application discussions are ongoing with various proposals for residential conversions, and they continue to investigate the potential for accommodating affordable housing need within their schemes.</p> <p>The Authority prides itself in its openness to scrutiny and is reassured by the evidence of planning applications already determined that suggest that the policy position is being enacted through the market, and that there will be more economic generating development arising from the conversion of redundant agricultural buildings than would have occurred under previous policy regimes. This makes a substantial contribution towards maintaining the sustainability of the rural economy, more so than the NPA would have been able to state under the UDP . We will continue to monitor this position and the operation of the LDP in general through the Annual Monitoring Report process.</p>	
AB Planning	<p>Having been present at the majority of the sessions of the LDP hearing and having engaged for over 10 years with</p>	<p>of the Social Housing Grant is available less and less often which suggests that the scenario</p>	No change

	<p>other qualified experts involved in the delivery of economic and unsubsidised development, it is apparent that the current policy is unrelated to the reality of the delivery of development and especially housing development and affordable housing development in the countryside.</p> <p>It is clear that without the economic distortion of significant grant aid the conversion of rural barns to dwellings to provide affordable housing will be unrealistic.</p> <p>Where funding is available and those providing it are required to act economically and efficiently they are likely to be required to account for the use of 'public funds' on inefficient or significantly more expensive conversions when compared to new build and more energy efficient proposals.</p>	<p>envisioned here is not viable. . It would be unlikely that SHG would be used to develop a barn conversion for affordable housing</p> <p>The NPA is open to considering barn conversions as 'build your own affordable home' style developments, where initial occupation and resale are tied by S106 to local people in affordable housing need and to affordable levels (and/or offered to an RSL for reuse at 42% of ACG)</p> <p>Moreover the policy position has the potential to significantly raise the monies available to spend by RSLs in the area to facilitate affordable housing through increased value of commuted sums.</p>	
AB Planning	<p>It is apparent to most practitioners that the preference towards employment or leisure/business uses are very often the least functionally acceptable and less sustainable uses in remote rural locations.</p> <p>If there is no need for the preferred uses - the obvious case that will then arise – that there will be housing need within the local area - (and if the SPG is adopted) an irrationally formulated and poorly evidenced tax on the development will then be applied.</p>	<p>The evidence of the Authority regarding development preference does not support the respondent's assertions.</p> <p>The mechanism to facilitate residential development is considered to be sound, in that it requires an equivalent benefit to meet the identified need.</p>	
AB Planning	<p>Neither the policy itself or the SPG document explains why this is reasonable at the level proposed and there appears to be a perverse reference to National Planning Guidance that would support the preferred uses. It is clear that the National guidance would prefer the</p>	<p>As stated in the above response, National Planning Policy supports the policy position set out.</p> <p>The issue surrounds the policy's requirement for the applicant to prove that there is no need for</p>	

	<p>alternative uses (subject to then being sustainable), however they would not support the punitive 58% x ACG formula and even less so if that was not capable of testing for viability.</p>	<p>affordable housing within the area. Where it can be proven that there is no need, then no contribution will be required from an open market residential barn conversion (depending on all other policy requirements being met). Where need is identified, the applicant will be required to meet the identified need through the provision of an equivalent financial benefit. This affordable housing benefit will ensure that the impact on the affordability of rural housing market can be addressed through the equivalent provision in more appropriate and sustainable location.</p>	
AB Planning	<p>To have limited in scope given its title – not providing guidance on the majority of rural planning development other than the 4 types of housing delivery listed.</p>	<p>The respondent will note the recent publication of other Guidance notes relating to criteria of CYD LP I. We believe that all points which require clarification in the policy have been sufficiently addressed in these.</p>	
AB Planning	<p>To be limited in terms of NOT explaining a clear relationship between the CYD LPI policy within the LDP and the content of the SPG – for example the policy does not set out to prevent the conversion of rural building to market dwellings (the SPG does exactly this, albeit in a non transparent and economically punitive way). The SPG invents this approach as it is not present in the primary LDP policy, neither is it present in the National Planning Policy contained within PPW 2014 or TAN 6. The aspirations of those documents will be served by the imposition of a policy that reflected the approach to affordable housing contributions as applied to the respective ‘Sub-market Areas’ as evidenced by the BBNPA at its LDP examination.</p>	<p>The LDP sets out that the policy position that development in countryside locations is less sustainable and more environmentally challenging than is considered acceptable. As such it is the vision of the LDP to increase the viability and diversity of rural practice, including supporting farming practice to engender a more vital future for our countryside. As such the loss of agricultural buildings from economic generating activity to non-economic generating activity is not supported by the LDP. The only acceptable exception to this position is if the development would be to meet an identified need for affordable housing or rural enterprise as this form of development is considered to be in keeping with the vision for the creation of a sustainable vibrant and vital countryside. This strategy position is implemented</p>	

		<p>through policy CYD LPI criterion I(b) which states:- outside of defined settlements within the LDP the following forms of development will be permitted subject to all other relevant LDP Policies :- (I) Proposals that capitalise on improving the existing building stock and/or utilises previously developed land and/or re-uses redundant buildings, including (b) Proposals to re-instate redundant buildings to the following beneficial uses (i) Commercial, Sport, Tourism or Recreation use OR (ii) Affordable housing to serve an identified need or (iii) The proposal will provide a Rural Enterprise Dwelling to serve an evidenced essential need. Only in cases where evidence can be provided to the NPA that the need for conversion to the above uses does not exist within the locality will the NPA consider proposals to reinstate redundant buildings for use as open market housing.</p> <p>In order to satisfy the policy requirements the proposal must demonstrate how through its development it will contribute towards the identified need for affordable housing within the area. It is recognised that re-use of rural buildings to affordable housing may not be practicably sound (as evidenced by interest or lack thereof from local Housing Associations), and in such cases as an exception , a financial contribution would be made which could be utilised by the NPA for provision of a more suitable form of affordable housing within the National Park area. There is no policy provision within the plan which enables the Authority to take a proportionate contribution to affordable housing for new dwellings in the countryside. (Policy 28 refers to a proportionate contribution to affordable housing within identified settlements) . In order for such a proposal to meet</p>	
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		<p>the policy requirements of the LDP it would need to provide for the identified need in an equivalent manner. As the need relates to one whole affordable unit, that is what the equivalent financial contribution must provide. As per standard practice this is valued at a cost of 58% of ACG.</p> <p>This position is compliant with National Policy as follows</p> <p>Planning Policy Wales – 4.7.8 TAN 6 –2.2.3. 3.2, 3.5, 3.6 TAN 23 – 3.2.2</p>	
AB Planning	To be devoid of the essential requirement to ensure that the contents of a planning Obligation are relevant to the development, proportionate and therefore subject to assessment and evaluation. The SPG therefore is at variance with national planning guidance relating to the formulation and content of Planning Obligations.	The NPA is satisfied the proposal meets the tests for appropriate planning obligations.	
AB Planning	To be out of accord with the approach taking by other LPA's and National Parks – at a time when the aspirations of Government is to encourage LPA and La's to work together and combine good planning practice that is in accord with national planning guidance.	The approach taken within the LDP is in line with National Planning Policy and was accepted at the examination stage when the Inspector could have taken action and chose not to. .	
AB Planning	To be unrelated to evidence presented by the LPA at the LDP public enquiry that has led to the application of an affordability assessment being the factual basis of the application of planning Obligation contributions within the respective areas of the National Park area	This point requires clarification from the respondent. It is unclear what evidence the respondent is referring to, especially as the Inspector has found the policy to be sound.	
AB Planning	Having regard to the above, in the Heads of the Valleys Sub-area the Inspector found there was no evidence to	There is a significant difference in the potential profit from a modest starter home and an open	

	<p>apply a 10% affordable housing levy that would have resulted in a contribution of around £10K on a modest rural 'starter home'. If such a home was delivered via a barn conversion within a barn complex a few metres outside the village settlement the levy would be as much as or more than 400% higher than the figure that the Planning Inspector stated was excessive and unjustified with the required evidence being missing from the Parks and its external experts submissions.</p>	<p>countryside barn conversion, Where it can be proven that there is no affordable housing need in an area, no affordable housing provision will be necessary. It follows in an area of low land values, there will not be the same acute affordability issues as face some of the higher land value areas within the National Park.</p>	
<p>AB Planning</p>	<p>If the LPA wishes to impose the current punitive sums – where is the evidence to justify it now? and when was it produced after the Inspector concluded the work carried out at the time of the Public Inquiry was inadequate to justify the vastly lower or non-existent levy previously intended.</p> <p>Having regard to the point raised above there should be fundamentally comprehensive evidence relating to justification of the SPG in the heads of the Valleys area and significantly updated evidence for the 20% and 30% respective sub-market areas to increase to 100% (e.g. evidence to support contributions rising from £20K to £100K)?</p> <p>The approach to not allowing viability and economic testing therefore ensures the policy is in effect a rule that fails to have the essential evidence base to support it or thereafter the flexibility that generally delivers circumstance related to appropriate and defensible planning solutions.</p>	<p>The fundamental issue being addressed in the SPG is that the use of a redundant barn for open market residential use results in the loss of either an economic generating development or an affordable home from rural communities. The impact of that loss must be addressed.</p> <p>There is no policy provision within the plan which enables the Authority to take a proportionate approach (as set out in Policy 28) as the policy is seeking applicants address the need for affordable housing on site. The need stated is for an affordable home, and not a proportion of an affordable home. As such, to provide for the identified affordable housing need an applicant can provide equivalent benefit in lieu of onsite provision.</p> <p>Where the loss of beneficial use/impact on affordable housing need cannot be addressed due to development economics, then it is suggested the developer will need to consider other beneficial uses for the development in line with the policy.</p>	
<p>AB Planning</p>	<p>The application of this policy/SPG will amongst other harmful effects:</p>	<p>We do not agree that there is any evidence that these stated impacts would arise rather we see that</p>	

	<ol style="list-style-type: none"> 1 Reduce housing supply 2 Reduce affordable housing supply 3 Reduce private investment in the historic built fabric 4 Harm the economy 5 Discourage enterprise 6 Harm the character of the National Park 7 Reduce opportunities for employment 8 Reduce the maintenance of traditional high quality building skill 9 Undermine the LDP 	<p>the strategy of the LDP</p> <ul style="list-style-type: none"> - Reapportions housing supply to the most sustainable locations for development in keeping with National Policy aspirations - Increases the options for provision of affordable housing within open countryside locations - Potentially increases the provision of affordable housing development from contributions paid to the Affordable Housing fund - Strengthens the sustainability of the economy by facilitating development for economic generating activity - Will improve the character of the National Park by raising design standards - Improve opportunities for employment through the development of employment generating uses - Has no impact on the status quo with regards to the employment of local builders. Conversions of barns continue to be applied for and granted planning permission. - Provides detailed guidance to aid implementation of the LDP. 	
<p>AB Planning</p>	<p>This policy/SPG should therefore be urgently re-considered, including the pre-document formulation interaction/consultation with the key partners/consultees as referred to above.</p> <p>I trust these observations are of assistance and I would be grateful if they are reported to the members of the National Park in full during their consideration of this Policy should it proceed without the above reconsideration.</p>	<p>The proposed SPG provides sound guidance on the implementation of adopted policy.</p> <p>This document is being produced for Member scrutiny and as such your comments (as are all respondents comments) are reproduced here verbatim.</p> <p>Your invitation is noted, however, we would suggest that the time to have provided this evidence to the Authority would have been in</p>	

	<p>In the unlikely event that you would like to discuss and consider the valuable input I can provide to you, that arises from the extensive experience of my numerous clients, who are affected by this policy and related SPG and other policies you apply, please do not hesitate to contact me. If I do not hear from you with such an invitation I will advise my clients accordingly.</p>	<p>response to the various LDP consultations since 2010 in relation to this policy, or during the hearing sessions of the Examination which the respondent attended.. The Policy and the LDP has been found sound through the Examination process and adopted by the Authority.</p>	
<p>Kirsty Williams AM</p>	<p>Concerns have been raised with me with regard to the commuted sums proposed in paragraph 3.2.11. If this policy is introduced it will lead to an overall increase in the price of existing rural properties within the BBNP which could have the effect of making them too expensive for the vast majority of residents. In addition, I would be grateful to learn how the Brecon Beacons National Park Authority will ensure that the money held is strategically allocated for provision of Affordable Housing in the National Park, as concerns have been raised with me about the expertise and knowledge within the Authority to ensure this.</p> <p>I feel that there is an inference in this consultation draft that barn conversions do not make a positive contribution to the countryside of the BBNP. This is most concerning; barn conversions make use of brown field sites and if not converted these important buildings and the land around them can completely deteriorate. The renovation of these buildings also leads to employment for local people and trade in local materials which has a very positive effect on the local economy. For example, many barn conversions within the Park use lime mortar supplied by Ty Mawr Lime and if these buildings had not been converted there is little doubt that Ty Mawr and many other local businesses may not have existed.</p> <p>Specifically I would like to object to Pargaraph 3.2.12 of the above document in terms of the commuted sum</p>	<p>The proposed guidance sets out a procedure against which applicants wishing to convert a barn to a non-listed beneficial use can mitigate for the impact of their proposal on the realisation of the LDP strategy, ie. The loss from the rural market an economic generating development or affordable house in favour of a residential development.</p> <p>The Authority would use any income generated from this proposal to help facilitate affordable housing within the National Park. The administration of the resulting fund will be undertaken in accordance with the procedure set out in the Affordable Housing SPG. The NPA will appropriate monies in accordance with a defined Affordable Housing strategy jointly developed between the NPA, RSLs and Strategic Housing Officers.</p> <p>To reiterate, the policy enables barns to be converted to a range of beneficial uses which are considered to contribute more to sustaining the rural economy than open market barn conversions. Accordingly the NPA has seen continuing applications for economic generating development from barn conversions since the introduction of the policy. The barns will not be lost, local builders and suppliers will retain potential employment from such schemes. (NB we have no evidence to</p>	

	<p>contribution that should apply to barn conversions. I believe that the 58% commuted sum contribution is excessively high and needs to be reconsidered to ensure the maintenance and good condition of barns within the National Park. The restoration of these buildings fulfil the Authority's remit of conserving the appearance of this area of outstanding natural beauty. Another potential pitfall of such a high commuted sum is that this, combined with the additional costs of converting an old building as opposed to a new build, will mean very limited rural residential development and therefore negligible commuted sums achieved.</p> <p>There is undoubtedly a need for affordable housing in the vast majority of areas within the BBNP and I support the aims of the Authority to prioritise this type of development. However the need for Affordable Housing does not, on it's own, make the use of redundant buildings for affordable housing the best use. The size, type and location of a building will determine if it would be suitable for affordable housing and I would like to see much more flexibility in the above policy.</p>	<p>suggest that residential barn conversions increase trade for either local craftsmen or suppliers, we would be interested to see anything which supported this assertion).</p>	
<p>CLA Cymru</p>	<p>Paragraph 4.9.1.1 of the LDP is restrictive and does not allow a mechanism for challenge or review. It is disappointing that the Park has taken such an entrenched view which lacks capacity to react to changing circumstances. Without some development in rural communities there is a real risk of communities becoming unsustainable with the provision of local services rendered unviable. We contend that limited development could enhance the community infrastructure of the National Park. We note that there is a requirement of some 1990 dwellings between 2007 and 2022, the information on completions and dwellings under construction in open countryside already indicate that the opportunity for such development is limited and our members predict that this</p>	<p>These concerns have been addressed in previous responses.</p>	<p>No change</p>

	<p>policy will frustrate all future developments. We also note that the proposed policy is not universally applied in other local authorities or more importantly other national parks in Wales.</p>		
CLA Cymru	<p>LDP 4.9.3.3 indicates that “all areas outside of settlements listed within.....are designated as countryside locations”. Indeed CYD LPI sets out the forms of development that the Park will permit and yet in the introduction to the SPG the purpose is limited to only 4 of those categories. We would welcome clarification on what further guidance will be made available to applicants wishing to look at other development types as this SPG appears limited in scope.</p>	<p>Additional SPG relating to the remaining criteria of CYD LPI are currently in preparation. there will be more SPG consultations in the future.</p>	
CLA Cymru	<p>CYP LPI requires proposals for countryside developments to contribute positively to their countryside setting; we firmly believe that sensitive development of any redundant building at risk of becoming derelict makes a positive contribution to a living thriving environment. We further contend that with such inflexibility there are many buildings which will become dilapidated and potentially disappear within the lifetime of this LDP.</p>	<p>We note that there has not be a change in the number of applications being received for the conversion of redundant buildings since the introduction of the LDP. There has been a shift in the uses to which such conversions are being employed, as per the adopted strategy position</p>	
CLA Cymru	<p>The provision of affordable housing is necessary and accepted however we question the location of such housing. The qualifying criteria for such accommodation often favours those who are benefit dependant or on lower incomes. The “countryside” locations offered by this option, whilst offering a possible solution to the need for a dwelling, can often be unsuitable for those on lower incomes. Fuel poverty is a very real issue for rural communities hence the need for local services by way of public transport and basic access to socio-economic facilities. These services are placed under further pressure with any increase in population. Additionally, by virtue of their geography many rural areas are often unable to access reliable broadband which has ramifications both for employment opportunities but can also lead to inequality</p>	<p>The policy position is in line with the beneficial uses for rural building conversions listed in TAN 23. We also note that TAN 6 sets out that LPAs should take an innovative approach to the delivery of affordable housing in rural areas. Our adopted LDP supports the position of exploring the suitability of such buildings for the re-use of affordable housing before consideration of open-market residential conversions.</p>	

	of access for training and education.		
CLA Cymru	For some time now, members have accepted the burden of marketing a building for alternative uses but the additional requirements imposed by 3.2.8 are excessive. It seems contrary to the principles of natural justice that the Park authority could change the goal posts by requiring further evidence at their whim. We would urge the Park Authority to review this proposal and give an exhaustive list of evidence sources at the outset so that potential applicants may make a sound economic decision on the viability or otherwise of an application before consideration to develop results in significant expenditure.	As previously stated the 'burden of evidence' is only necessary in cases where applicants are seeking an exception to the accepted policy position. It is reasonable that any departure from the accepted policy position should be carefully evidenced to detail how the impact generated from such deviation is to be addressed.	
CLA Cymru	3.2.11 indicates that where all other avenues have been exhausted with the building having been declined by Registered Social Landlords, permission may still be theoretically possible subject to the payment of a 58% commuted sum. In light of the presumption of need for affordable housing in all areas, the decision of an RSL to decline a building will not have been made lightly. Having spoken to some RSL's it is our understanding that this decision is indication that the site is economically unviable to convert or that the site location is not considered as appropriate for letting purposes. The 58% levy also draws the economic viability of a project into question with every developer consulted informing that they would not entertain such a project. We are concerned that this arbitrary proposal takes no regard for viability testing. The reality is that there is no prospect of securing any borrowings for such a project hence the opportunity would be well outside the grasp of any native person who relies on the area for their income. This policy has the potential for multiple effects: <input type="checkbox"/> Lost employment opportunities, usually for small local building firms as projects become unviable; <input type="checkbox"/> If the project is affordable to an individual, the likely resale value would be beyond the range of a local person	The general points relayed here have been addressed in previous responses; purpose of the policy is to provide an increase in employment opportunities and affordable housing within countryside locations. The NPA is providing opportunity for mitigation where an applicant is seeking a non-listed beneficial use. This must address the impact such a proposal would have through equivalent benefit. In response to the specific issues raised <ul style="list-style-type: none"> - The proposal will increase employment opportunities from the creation of new economic-generating development in accordance with the stated policy position. It is predicted to have a neutral impact on the local building trade as conversions will still occur. - It is our contention that the resale value of residential barn conversions is beyond the range of a local person working in the area well before the introduction of this policy. The policy position provides a process by which such developments can be repurposed as affordable housing to address 	

	<p>working in the area. In this instance we have grave concerns as to the LDP objective SEI which aspires to promote an integrated and thriving community;</p> <p><input type="checkbox"/> Pursuit of this policy could result in polarisation of areas with either no development except that of affordable housing or the development of high specification housing beyond the means of most people.</p>	<p>this very issue.</p>	
CLA Cymru	<p>Through the LDP examination, we understand that the inspector advised against levying a 10% commuted sums against development in the Heads of the Valley and Rural South submarket areas. As we understand the situation, this was to prevent development stagnation in these areas, however we have been unable to locate any record of public discussion. We also cannot find evidence of a full examination of the impact of a 58% commuted sum, prior to the publication of this SPG.</p>	<p>As previously stated where there is no need for affordable housing in an area, as in an area with a dearth of low income housing, there will be no affordable housing benefit necessary from a residential barn conversion.</p>	
CLA Cymru	<p>3.2.12 Appears merely to attempt to justify the financial measurement introduced by 3.2.11 without reference to the approved LDP policy.</p>	<p>The policy reference is clearly stated as CYD LPI</p>	
CLA Cymru	<p>We are concerned that the SPG does not clearly relate to the policy, the intentions of paragraphs 3.2.11 and 3.2.12 exceed any levies previously published for public scrutiny</p>	<p>As above.</p>	