

# **Brecon Beacons National Park**

## **Local Development Plan**

## **Delivery Agreement**

**June 2018**

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## **1.0 Context**

### **Introduction**

- I.1 Every local planning authority in Wales has a statutory duty to prepare a local development plan within the framework set out by national planning policy in Planning Policy Wales. Under section 38(6) of the Planning and Compulsory Purchase Act 2004 planning applications must be decided in accordance with the adopted LDP for the area.
- I.2 The Brecon Beacons National Park Authority first commenced work on their Local Development Plan in 2007. This plan was adopted by the National Park Authority for use in Development Control in December 2012. The Plan has been subject to yearly monitoring and review.
- I.3 In accordance with Local Development Plan regulation 41 a review of the Brecon Beacons National Park Local Development Plan was commenced December 2017. As part of this review process the Authority has produced and published 'The Review Report'<sup>1</sup>. This statutory document provides an overview of the key issues arising from the monitoring of the LDP and emerging evidence to identify the scope of necessary changes to the Local Development Plan. The Review Report has concluded that the LDP should be reviewed in full.
- I.4 The adopted Brecon Beacons National Park Local Development Plan (BBNPA LDP) (December 2013) remains extant and will continue to be the policy framework by which planning applications are determined up until December 2022.

### **The Delivery Agreement**

- I.5 The Delivery Agreement (DA) is a public document of the BBNPA, incorporating its project plan and its policy for involving the community in revision of the Local Development Plan. It is an agreement between the Brecon Beacons National Park Authority (BBNPA) and the Welsh Government (WG) and relates specifically to the Local Development Plan. The DA details the following:
- **Project Management Timetable:** A realistic timetable detailing the various stages of the preparation and delivery of the revised Local Development Plan (LDP) and how the process of the Plan preparation will be project managed. This timetable also sets out the resources that are required at each stage.
  - **Community Involvement Scheme (CIS):** The CIS sets out the BBNPA's principles, strategy and mechanisms for early and continuous community and stakeholder engagement throughout the LDP revision process.
- I.6 However the Delivery Agreement is more than an essential project management tool for the authority. It underlines the continued importance of the LDP within the Authority, emphasises the scope and influence of the Plan and alerts external partners, stakeholders and the community from whom inputs shall be sought.

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<sup>1</sup> Endorsed by NPA 20<sup>th</sup> April 2018 <https://governance.beacons-npa.gov.uk/documents/s28711/Enclosure%201%20-%20Draft%20Review%20Report.pdf>

- I.7 The content of this Delivery Agreement will specifically cover the preparation processes of the Brecon Beacons National Park Authority Local Development Plan (LDP) and the associated Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) and Habitats Regulations Assessment (HRA). Once agreed, this Delivery Agreement commits BBNPA to revise the LDP according to the stated timescales and consultation processes. Any subsequent significant deviations that have not been agreed by the Welsh Government will be examined by the Inspector. What constitutes a significant deviation is discussed at paragraph 2.7, Risk Management and Mitigation.

### **Review of Other Plans, Programmes and Policies**

- I.8 In reviewing the LDP the NPA must have regard to a broad range of legislation, policies and other initiatives at European, national and local levels. In addition to this the NPA must consider social, economic and environmental factors and be informed by various background reports and other technical data referred to as the 'evidence base'.
- I.9 More specifically, the planning and Compulsory Purchase Act (2004) requires the Authority to have regard to current national planning policy and guidance. A definitive list of relevant policies plans and programmes will be produced as part of the Scoping Report of the SA/SEA. However, the principal documents are as follows:
- Planning Policy Wales PPW (9<sup>th</sup> Ed)(November 2016);
  - Technical Advice Notes (Wales) (TANs);
  - Local Development Plan Manual (2<sup>nd</sup> Ed) (2015).
- I.10 In addition to these planning policy and guidance documents, the NPA must also have regard to:
- The Wales Spatial Plan: *People, Places, Futures*;
  - The Waste Strategy for Wales and Regional Waste Plans;
  - The Environment Strategy for Wales; and
  - The Well-being of Future Generations Act (2015)
- I.11 However, opportunities for local discretion will be available when justified.
- I.12 The BBNPA is the Local Planning Authority (LPA) for the National Park area and is not directly responsible for highways, economic development and housing issues. These responsibilities remain with the constituent Unitary Authorities and the respective Highways, Economic Development and Housing Authorities. It is therefore essential that the NPA work in partnership with the constituent Unitary Authorities to achieve appropriate developments within the Park boundary. With respect to this it remains imperative for BBNPA to have regard for the following constituent Unitary Authority Plans and Strategies when preparing the LDP:
- Community Strategies;
  - Local Housing Strategies;
  - Local Transport Plans (and other policies prepared under the Transport Act 2000);
  - Economic Strategies;
  - Local Air Quality Management Plans.
  - Area Management Plans
- I.13 Meanwhile the BBNP Management Plan (NPMP) is the single most important policy document for the National Park and will therefore provide an important input into the Authority's LDP. It is a plan for the geographic area of the Park and not specifically for the authority and, as a strategic over-arching document, it co-ordinates and integrates other plans, strategies and actions in the National Park, including the Local Development Plan. The National Park Management Plan is, therefore, the principal vehicle for ensuring that the statutory provisions of the Environment Act

1995 are met, including the duties imposed on all public bodies under Section 62(2)<sup>2</sup> to have regard to National Park purposes, whilst carrying out their work.

- I.14 The following BBNPA strategies will also provide an important influence on the production of the LDP:
- BBNPA Corporate Plan;
  - Local Biodiversity Action Plan;
  - Nature Recovery Action Plan
  - Sustainable Tourism Strategy;
  - Sustainable Development Strategy and;
  - Social Inclusion Strategy.

### **Purposes of the National Park**

I.15 The Local Development Plan preparation process will be produced in the context of the National Park's statutory context. The future of National Parks is guided by their two purposes, as set out in Section 61 of the Environment Act 1995:

- **Conservation and enhancement:** “to conserve and enhance the natural beauty, wildlife, and cultural heritage of the National Parks”.
- **Understanding and enjoyment:** “to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public”.

I.16 These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of conflict. Meanwhile, in pursuing these purposes, the Authority has a duty to:

- Seek to foster the social and economic well-being its local communities<sup>3</sup>.

### **Well-Being of Future Generations Act 2015**

I.17 The Well-being of Future Generations (Wales) Act places a duty on public bodies to carry out sustainable development to improve the way in which we achieve the social, economic, environmental and cultural well-being of Wales. The NPA must act in accordance with the sustainable development principle and seek to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. As part of this duty public bodies must set and publish objectives which are designed to maximise its contribution to achieving each of the well-being goals. The 7 goals are

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

I.18 The Act also defines five ways of working which are:- long term; integration; involvement; collaboration and prevention.

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<sup>2</sup> CCW (2006) National Park Management Plans Guidance

<sup>3</sup> Appendix 3 summarises the Demographics of the National Park area

- I.19 The LDP revision will embrace these concepts of sustainable development and the five ways of working and ensure that the goals of the Act underpin the reformulation of the LDP.

### **Evidence Base Assessments**

- I.20 Local Development Plan review is an evidence led process. Through yearly monitoring, the Authority has gained useful insight into how the LDP is functioning and where greater detail is necessary in order to implement effective policy making and planning decisions. The following evidence sources are either under current review or planned review:-

- Housing Needs Assessment
- Affordable Housing Viability Assessment
- Employment Land Review and Needs Assessment
- Retail Assessment
- Settlement assessment including capacity review
- Amenity Open Space Review
- Renewable Energy Assessment
- Infrastructure Plan
- Welsh Language Assessment
- Green Infrastructure Review

### **Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) of Local Development Plans (LDPs)**

- I.21 The Planning and Compulsory Purchase Act 2004 requires planning authorities to undertake a Sustainability Appraisal of their LDP and report the findings as an integral part of the process of plan preparation. Environmental, economic and social implications of the plan's policies will be considered within a full appraisal of the interaction of policies within the plan. In addition to this, the EU Directive 2001/42/EC (and resulting Environmental Assessment of Plans and Programmes (Wales) Regulations 2004) requires planning authorities to undertake a formal Strategic Environmental Assessment of plans and programmes that are likely to have significant effects on the environment. BBNPA intends to adopt an integrated approach to implementing these requirements.
- I.22 Finally, in accordance with the Habitats Directive 92/43/EEC, the impacts of any land use plan against the conservation objectives of a European Site are to be assessed by means of a Habitats Regulations Assessment. The possible need for an Appropriate Assessment (AA) will be established following a test of significance. Any resulting AA will follow the same iterative process as that of the SA/SEA wherever possible. However it is worth noting at this stage that SA/SEA outputs will be clearly distinguishable and reported on separately.
- I.23 To be fully effective BBNPA will ensure that the SA/ SEA and HRA are fully integrated into the plan making process and will provide input at each stage when decisions are taken. In developing the SA/ SEA and HRA, BBNPA will have regard to the specific objectives and principles of PPW.

### **Principles of Project Management Timetabling**

- I.24 Early consideration and adequate priority to plan preparation and handling of the process through effective leadership and project management is considered vital to the NPA. This early consideration includes:
- Considering how long the reviewed plan will take to reach adoption and the staffing resources and budgets that are needed at various stages in the process;

- Agreeing a timetable at the start of the plan preparation process leading to the adoption of the Plan;
- Using principles of good project management to enable monitoring and review of progress towards adoption against agreed milestones and;
- Implementing a programme of monitoring and Plan review thereafter.

### **Principles of Community Involvement**

- I.25 key objective of the LDP system is to build greater consensus and strengthen community involvement. The NPA is committed to early and effective community engagement in plan making and through the development of the LDP harboured innovative and meaningful techniques for including our community in development plan formation. This is something that the Authority believes is essential to the effective review of the LDP. The Delivery Agreement provides an opportunity to reiterate the Authority's commitment to community involvement in plan making and set out the way in which we are to facilitate this.
- I.26 The key principles that underpin community engagement in the LDP process<sup>4</sup> are:
- Creating conditions for early involvement and feedback at a stage when people can recognise a chance to influence the Plan;
  - Encouraging the commitment of all participants to an open and honest debate on realistic development alternatives in the search for consensus and;
  - Recognising the need to adopt approaches for engaging the community, including business, which seeks the views of those not normally involved.
- I.27 As a result, it is intended that the LDP review system will become clearer, more transparent, concise, and accessible to the public.

### **Test of Soundness<sup>5</sup>**

- I.28 The concept of 'soundness' is that against which the revised LDP will be assessed by an Independent Inspector appointed by the Welsh Government. When we refer to a 'sound' plan it is meant one that it is based on good judgement and can be trusted. There are three statutory tests of soundness as follows:-
- Test 1 – Does the plan fit? The Inspector will consider whether the revised LDP is consistent with other plans and programmes
  - Test 2 – Is the plan appropriate? The Inspector will consider whether the plan provides the right policy response to the available evidence
  - Test 3 – Will the plan deliver? The Inspector will only consider a plan sound if it is likely to deliver the stated outcomes.
- I.29 The Inspector's findings will be binding on the Authority and unless the Welsh Government determine otherwise, the NPA must accept any changes made by the Inspector in the finalised revised LDP.
- I.30 Failure to produce a sound plan may result in the Authority having to repeat stages of the LDP revision process.

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<sup>4</sup> These principles were included in the Statement on Planning Delivering for Wales by the Minister for Environment, Planning and the Countryside in November 2004

<sup>5</sup> PINS (2006) Guide to the Examination of LDPs

## Local Development Plan Supplementary Planning Guidance<sup>6</sup>

- I.31 The revised LDP will contain sufficient policies and proposals to provide the basis for deciding planning applications and for determining conditions to be attached to planning permissions. However in certain circumstances Supplementary Planning Guidance (SPG) can be beneficial in supporting implementation of specific policies or defining how certain areas will be developed.
- I.32 Since adoption of the LDP in 2013 the NPA has endorsed a range of Supplementary Planning Guidance (SPG) as follows:-
- Allotments
  - Affordable Housing Strategy
  - Householder Design Guide
  - Biodiversity and Development (September 2016)
  - Planning Obligation Strategy (July 2014)
  - Affordable Housing (September 2014)
  - Landscape and Development (October 2014)
  - Minerals Safeguarding (March 2015)
  - Obtrusive Lighting and Light Pollution (March 2015)
  - Farm Diversification (March 2015)
  - Low Impact Tourism Accommodation (March 2015)
  - Biodiversity in the Towns of the National Park (September 2016)
  - Small Scale Renewable Energy SPG (May 2015)
  - Enabling Appropriate Development in the Countryside (May 2015)
  - Sustainable Development in the National Parks of Wales (May 2015)
  - Hay Town Plan (September 2016)
  - Crickhowell Community Plan (February 2017)
  - Cerrigochion Road Development Brief (April 2016)
  - Hay Road Development Brief (March 2015)
  - Cwrt y Gollen Development Brief (July 2014)
- I.33 It is anticipated that the SPG topics above will continue to be necessary to the implementation of the revised Local Development Plan, and so will be carried forward with any necessary amendments to reflect the LDP review and updated evidence base.

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<sup>6</sup> For BBNPA consultation processes on Supplementary Planning Guidance refer to page 27/ 28

## 2.0 Project Management Timetable

### Timetabling the LDP, SA/SEA and HRA Processes

2.1 The NPA is committed to the timely and efficient revision to the Local Development Plan. To this end a timetable has been developed which aims to balance the need for prompt delivery with capacity for quality plan making. This timetable is summarised at table 1 below.

These identified stages of the timetable are in accordance with the LDP Regulations under Part 6 of the Planning and Compulsory Purchase Act 2004 and consist of two broad stages. These are as follows:

- The **Definitive Stages** that include all stages up to and including the statutory deposit period, and;
- The **Indicative Stages** that include all work carried out after the Deposit period up to the adoption date.

2.2 The definitive stages of the project management timetable require detailed, transparent and realistic timetabling that can be monitored in the assessment of the plan's soundness. During these stages any significant deviations will need to be approved by WG and accounted for by the NPA. Meanwhile the indicative stages of plan preparation are flexible and dependent on unforeseen factors. The dates of the indicative stages will be defined within 3 months of the close of the formal 8-week deposit period.<sup>7</sup>

Key Stage	Timescale	
Definitive	From	To
Delivery Agreement	June 2018	September 2018
	Consultation commences June 2018 NPA endorsement September 2018 WG response within 4 weeks	
Pre-Deposit Participation	October 2018	June 2019
	NPA resolution to consult on Preferred Strategy April 2019	
Preferred Strategy (Pre-Deposit)	May 2019	June 2019

<sup>7</sup> WAG, 2005, Local Development Plans Wales 2005

<b>Consultation)</b>	8 Week consultation Report to NPA consultation responses and resulting actions	
<b>Deposit Preparation</b>	July 2019	August 2020
	NPA resolution to consult on Deposit LDP June 2020	
<b>Statutory Deposit Plan Consultation</b>	July 2020	August 2020
	8 Week Consultation Report to NPA Focused Changes and resolution to submit plan September 2020	
<b>Indicative</b>		
<b>Submission of LDP to Welsh Government</b>	May 2021	
<b>Independent Examination</b>	July 2021	
<b>Inspectors Report</b>	March 2022	
<b>Adoption</b>	May 2022	

A more detailed project timetable can be found at Section 7 below.

### 3.0 SA/SEA and HRA tasks

3.1 In addition to the above, a SA/SEA and HRA will be undertaken as iterative processes throughout plan preparation. The following are the key stages of SA/SEA that are to be undertaken in conjunction with the stages identified above:

- Establish policy context, identify and document evidence base, identify sustainability issues and develop SA/SEA objectives and indicators;
- Consult Specific consultees on Scoping Report during the Pre Deposit Stakeholder Participation;
- Publish Initial 'SA Report' / 'SEA Environmental Report' in conjunction with 'Preferred Strategy' (during Pre-Deposit Public Consultation);
- Deposit SA Report (including Environmental Report) with the Deposit Plan;
- Publish the final 'SA Report' (inc statement of how SA/ SEA influenced the Plan) following the Inspectors Report and adoption;
- Monitoring and implementation of the SA.

3.2 However, it is worth noting at this stage that the sequential LDP and SA/SEA preparation processes illustrated above have been exaggerated for presentation purposes. In reality the processes are iterative, on-going and cyclic with feedback taking place throughout the process, not just as a result of annual monitoring and review.

#### 4.0 Staff Resources

4.1 In review of the LDP, including undertaking community involvement, the Authority will devote the necessary resources, primary officer/ member time and revenue funding.

4.2 The staffing resources for the LDP will be provided by the Strategy and Policy Team. However it is necessary to note that this structure will not be rigid and there will be considerable joint-working throughout the processes of producing the Plan. For example the Strategy and Policy Officers will have considerable input into the National Park Management Plan production, including consultation. In addition to this, a collective approach has been adopted with respect to the resources applied to the process of SA/SEA and HRA. Establishing an appropriate SA/SEA and HRA will consequently be the shared responsibility of all Strategy and Policy staff and will largely involve utilising the necessary skills from the relevant officers as and when required, including specialist staff.

Officer Job Title	Number of posts	Proportion of time spent on LDP production
Director of Planning	1	10%
Planning and Heritage Manager	1	30%
Principal Planning Policy Officer	1	75%
Senior Planning Policy Officer	2	75%
Planning Technician	1	30%

4.3 The figures above are indicative only due to the cross boundary working undertaken by the Strategy and Policy Team. These flexible working practices involve utilising the necessary staffing resources as and when required. In recognition of this the LDP and NPMP Project Management Timetables have been established in conjunction with one another to enable sound cross boundary working relationships.

4.4 In addition to this internal specialist support and assistance will also be provided by the following NPA staff:

- BBNPA Management Team;
- BBNPA Ecology Team
- BBNPA Sustainable Tourism Team
- BBNPA Community Development Officer;
- BBNPA Education Team;
- BBNPA Development Management Team;
- BBNPA ICT Support;

4.5 This illustrates that BBNPA is committed to undertaking as much of the work as possible internally.

## 5.0 Role of NPA Members & the Delegated Powers of Strategy and Policy Officers<sup>8</sup>

- 5.1 Strategy and Policy staff will be responsible for drafting policies and proposals on behalf of the NPA and will provide professional advice on key areas of policy. Officers will not make decisions on behalf of the NPA unless specifically given delegated powers to do so, although they will put forward recommendations to Authority members with regard to what course of action should be undertaken. The NPA Members are directly accountable to the electorate and will therefore be responsible for making the final decisions at key stages throughout the process.
- 5.2 Throughout the whole Local Development Plan process ongoing public consultation will be integral to the Plan's effective development. In order to accommodate the volume of work involved, a Development Plan Working Group has been established. All NPA members will be invited to sit on the working group. It will be structured to encourage open debate and consensus building between officers and members. Recommendations from the working group will be considered by members of the NPA.
- 5.3 Meanwhile, the work undertaken by Strategy and Policy officers will also be under the guidance of a NPMP/ LDP Steering Group. This group was established early on in the LDP process to oversee the processes involved in producing the Plans with a fully integrated SA/SEA. This steering group, although primarily for the NPMP/ LDP process, is also of benefit to the SA/SEA and HRA due to the integrated nature of these processes.

## 6.0 Financial Resources

### Financial Resources: Funding Plan Preparation

Stage in Plan Preparation	Budget
Delivery Agreement	£10k
Pre Deposit Participation	£100k
Pre Deposit Public Consultation	
Deposit Plan	£100k
Advertisement of Focused Changes	£10k
Submission of LDP to WAG	£150k
Independent Examination	
Inspector's Report	
Adoption	£40k
Annual monitoring Reports	

## 7.0 Local Development Plan and SA/SEA Integrated Project Management Timetable

<sup>8</sup> Appendix 1 highlights the dates for the SA/SEA Steering Groups and National Park Authority Committees

Stage	Date	Local Development Plan	LDP S.A./S.E.A.	LDP HRA
1	December 2017- June 2018	<ul style="list-style-type: none"> <li>Review &amp; Development of <b>Evidence Base</b></li> <li>Set up Development Plan Working Group</li> </ul>	<ul style="list-style-type: none"> <li>Set up SA/SEA Steering Group</li> </ul>	<ul style="list-style-type: none"> <li>Set up Steering Group</li> </ul>
Commencement of work on LDP Review				
2	June – September 2018	<p><b>Delivery Agreement:</b></p> <ul style="list-style-type: none"> <li>Project Management Timetable</li> <li>Community Involvement Scheme</li> </ul> <p>Draft DA Consultation: 28<sup>th</sup> June 2018 – 23<sup>rd</sup> August</p> <p>Resolution to adopt DA by NPA 21<sup>st</sup> September Agreement with WG: 19.10.18 (in principle)</p>	<ul style="list-style-type: none"> <li>Review of Plans, Policies and Programmes;</li> <li>Baseline Data Collection</li> </ul>	<ul style="list-style-type: none"> <li>Review of PPPs</li> <li>Baseline (of European Designated Sites).</li> <li>Agree HRA methodology</li> </ul>
3	October-December 2018	<ul style="list-style-type: none"> <li>Ongoing collection/ analysis of baseline</li> <li>Ongoing assistance in NPMP preparation</li> <li>Newsletter &amp; LDP invitations to consultees</li> <li>Ongoing preparation for Pre-Deposit Stages, including:</li> <li>Call for Candidate Sites (12 weeks)</li> </ul> <p><b>Review Issues Papers</b> (outlining Policy Context, baseline data and broad options for LDP Topics)</p>	<ul style="list-style-type: none"> <li>Screening Process</li> <li>Draft Objectives;</li> <li>Indicators;</li> <li>Identify Sustainability/ Environmental problems/ issues and;</li> <li>Preparation of <b>Scoping Report</b>-framework</li> </ul>	<ul style="list-style-type: none"> <li>Screening Process</li> <li>Draft Objective(s) for European Sites.</li> <li>Framework for Scoping Report (incorporating Scope of HRA)</li> </ul>
4	January – June 2019	<p><b>Pre-Deposit Public Engagement</b></p> <ul style="list-style-type: none"> <li>Preparation for Public Engagement and Preferred Strategy</li> </ul>	<p><b>Consultation on SA/ SEA Scoping Report</b></p>	<p><b>Consultation on Scoping Report</b></p> <p>(incorporating Scope of HRA)</p>
		<ul style="list-style-type: none"> <li>Pre-deposit <b>Public Engagement</b> on strategic issues, alternatives and options</li> <li>Production of '<b>Preferred Strategy Report</b>' for public consultation</li> </ul>	<ul style="list-style-type: none"> <li><b>Production of Initial SA/ Environ. Report</b></li> <li>Compatibility Testing- Development and Refining Alternatives</li> </ul>	<ul style="list-style-type: none"> <li>Test significance of 'Preferred Strategy' &amp; developing/ refining objectives</li> <li><b>Produce Initial HRA Appraisal</b>-contained in SA Report</li> </ul>

Stage	Date	Local Development Plan	LDP S.A./S.E.A.	LDP HRA
		<ul style="list-style-type: none"> <li>▪ <b>Consultation on 'Preferred Strategy'</b> (8 Week consultation to cover 6 week statutory period) May-June 2019</li> </ul>	<p><b>Consult on Initial SA/Env'tal Report</b> (with Preferred Strategy)</p>	<p><b>Consultation on the Initial HRA</b> contained in the SA Report (with Preferred Strategy)</p>
5	July 2019- June 2020	<p><b>LDP Preparation</b></p> <ul style="list-style-type: none"> <li>▪ Preparation of Draft Policies including clear targets and indicators</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>SA/ Env'tal Report Preparation</b> (including new options, alternatives &amp; Representations)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Significance test-policies/options/ Alternatives/ etc</li> <li>▪ <b>HRA Report Preparation</b> (inc new options &amp; Representations)</li> </ul>
6	July- August 2020	<p><b>LDP Statutory Deposit Period</b> (8 weeks) (Including Initial Consultation Report)</p>	<p><b>Consult on SA/ Environmental Report</b> (6 weeks in conjunction with LDP)</p>	<p><b>Consultation on HRA Report</b> contained in SA Report</p>
7	September 2020 – March 2021	<p><b>Consider Deposit Representations</b> (Use of Dev. Plan working Group)</p> <ul style="list-style-type: none"> <li>- Develop focused changes in consultation with Dev. Plan Working Group</li> <li>- Seek NPA approval to submit</li> </ul>	<p><b>Consider Representations to SA/ Env Report</b></p> <ul style="list-style-type: none"> <li>▪ <b>Assessment</b> of the significant changes made following consultation</li> <li>▪ <b>Decision on Requirement for Changes to Plan</b></li> </ul>	<p><b>Consider Representations to HRA Report</b></p> <ul style="list-style-type: none"> <li>▪ Significance test of changes</li> <li>▪ <b>Assessment</b> of the significant changes made as a result of consultation</li> <li>▪ <b>Decision on Requirement for Changes to Plan</b></li> </ul>

*Actions above run are definitive stages - Actions below have indicative stages*

Stage	Date	Local Development Plan (LDP)	LDP S.A./S.E.A. and A.A.	LDP HRA
8	April 2021	<p><b>Submission of LDP to WG:</b> (inc SA/SEA Report, HRA Report, evidence base, CIS if amended, consultation report, Focused changes)</p> <ul style="list-style-type: none"> <li>▪ Pre-Examination meeting with Inspectorate 6 weeks from submission</li> <li>▪ Consultation on Focused Changes</li> </ul>		-

9	<i>June – July 2021</i>	<b>Independent Examination in Public:</b> <ul style="list-style-type: none"> <li>▪ 12 weeks maximum for Examination &amp; 22 weeks until Inspector’s Report</li> </ul>	-	-
10	<i>March 2022</i>	<b>Inspector’s Report: ‘Binding’</b> (12 months from submission)	<ul style="list-style-type: none"> <li>▪ <b>Amend Report following Inspector’s Binding Report</b></li> <li>▪ <b>Statement of how SA/ SEA influenced the LDP</b> (on Adoption)</li> </ul>	<ul style="list-style-type: none"> <li>▪ <b>Amend HRA Report following Inspector’s Report</b></li> <li>▪ <b>Statement of how HRA influenced LDP</b></li> </ul>
11	<i>April 2022</i>	<b>Publication of the Planning Inspector’s Recommendations</b>		
12	<i>May 2022</i>	<b>Adoption of the Plan</b>		

## 8.0 LDP Risk Management & Mitigation

8.1 In accordance with WG guidance, BBNPA envisage that the LDP revision will span over an approximate 4 year period. However the authority recognises that there are a number of factors that could result in the plan preparation period not proceeding in accordance with the proposed timetable, despite every effort being made to avoid a deviation from the Delivery Agreement. The principle risks that the NPA need to consider in risk management are as follows:

- The publication of revised planning legislation/ guidance;
- A reduction in staff resources and budget available for the project;
- An over ambitious timetable due to greater than anticipated workload (SA/SEA/ HRA requirements);
- Unavailability of meetings and/ or agenda time of authority Member’s meetings to consider and approve necessary documents;
- Inability of printers/ translators to deliver documents in accordance with any approved timetable;
- A large volume or significance of responses to consultations;
- The ability of statutory consultees/ Inspectorate to respond within a set timetable given resource constraints;
- Failure of test of soundness;
- Legal challenge;
- Political Change/ elections;
- A lack of or failed engagement; or the
- Presence of a Habitats Directive Site affecting the ‘Preferred Strategy’.

8.2 Mitigation of any risk involved in adhering to the proposed timetable will be undertaken by the authority wherever possible (see Appendix 2). A detailed Project Management Timetable will contribute to a reduction in any risk level and, in conjunction with further mitigation measures, it is thought that the risk can be minimised. For example it is imperative that the authority monitor revisions to legislation/ guidance, ensure that consultation bodies and other external contributors are contacted in advance and work in close partnership with the WG and the Planning Inspectorate to ensure early warning of any problems.

8.3 However despite the mitigation measures to be adopted by the NPA, a threat remains due to the considerable number of factors listed above. In recognition of these factors it is considered

appropriate that BBNPA allow a 3 month tolerance level in the following timetable for slippage without any formal amendment to the Delivery Agreement. In addition to this it is worth noting that any slippage beyond the 3 month tolerance level without Welsh Government agreement could potentially be examined by the Inspector as a significant deviation from the Project Management Timetable.

## **9.0 Community Involvement Scheme (CIS)**

### **Introduction to the Community Involvement Process**

- 9.1 A key objective of the Local Development Plan system is to build greater consensus and strengthen community involvement in plan preparation. Its preparation offers the opportunity to rethink ways of engaging a full spectrum of the community, both within and beyond the National Park Boundary, in strategic issues and to seek involvement in the Local Development Plan Review preparation process from the outset. Undertaking a thorough Community Involvement Scheme also ensures that the Authority is in compliance with the Well-being of Future Generations (Wales) Act 2015. This Act puts a duty on the Authority to improve the sustainability and well-being of the areas and communities within its boundaries.
- 9.2 The National Park Authority welcomes these working practices and seeks to advertise planning as accessible for everyone, including those hard-to-reach groups within communities. Innovative ways of involving organisations, partners, stakeholders, communities and individuals are sought for the benefit of the wider communities of the National Park and beyond.
- 9.3 Opportunities for input will be provided on all key issues covering a wide range of interests. This process of involvement will commence at an early stage of the plan preparation process and will be continually refreshed by re-involvement. In addition to this, community involvement regarding the National Park Management Plan will be carried forward to the Local Development Plan Review process wherever appropriate. This will complement the fact that the Local Development Plan is underpinned by the National Park Management Plan. Furthermore, the State of the Park report will be incorporated into thematic 'Issues Papers' for the Local Development Plan Review that will play an important role in the development of strategic options during the pre-deposit stages.

### **Purposes and Benefits of Community Involvement**

- 9.4 If undertaken successfully, this community involvement will not only be a benefit to the Authority, but will also help to build as great a general consensus as possible amongst the Park's stakeholders, communities and individuals, therefore contributing to the overarching aim of a more sustainable future for the Brecon Beacons National Park.
- 9.5 In anticipation of achieving a greater consensus, this section of the Delivery Agreement discusses the proposed process of community involvement to be undertaken by the National Park Authority. Larger stakeholder and partner organisations are included in this involvement, as well as local community groups, interest groups, user groups and individuals. It sets out a methodology of how each group or individual can get involved and how a consensus will be sought.
- 9.6 A successful Community Involvement Scheme will contribute to:
- Benefits to the wider Community;
  - Benefits to the individuals or organisations involved in the consultation; and
  - Benefits to the Authority.
- 9.7 The process of the Community Involvement Scheme should create a collective sense of ownership in the future of the Brecon Beacons National Park by increasing the transparency of the processes of plan preparation, by contributing to an improved sense of community through an increased consensus and by balancing the responsibilities of the national asset with the needs of the locality. In summary, an effective Community Involvement Scheme will help to reduce conflict that has been traditionally associated with the development planning process.

### **Who should be Involved and what is expected from the Consultation Bodies?**

- 9.8 The Local Development Plan impacts on everyone who lives, works and visits the National Park and it is for this reason that it is vital that community involvement is a success right from the outset of the plan making process. It is recognised by Brecon Beacons National Park Authority that community participation and consultation practices need to be realistic in their aims. It is not feasible or necessary to involve everyone at every stage and it is therefore the preferred approach of the Authority to involve major stakeholders and partner organisations during the early strategic stages of the plan-making process. This participation will largely concentrate on high-level strategic issues and then, as the process develops, will become a consultation exercise involving smaller more representative groups discussing options for more localised issues.
- 9.9 The following are the key groups to be involved:
- BBNPA Corporate and Service Management Teams;
  - BBNPA Members;
  - Developers;
  - Farmers Unions;
  - General Public;
  - Gypsies and Travellers;
  - Local Businesses;
  - Local Community Groups;
  - Neighbouring Unitary Authorities;
  - Public and private organisations involved with conservation, using and enjoying the Park and land management;
  - Statutory Consultees;
  - Tourism Organisations;
  - Town and Community Councils;
  - Visitors and;
  - Youth.
- 9.10 Brecon Beacons National Park Authority intends to extend its work with its existing partners and develop new partnerships where appropriate. For example the National Park Authority will endeavour to involve all organisations formed during the preparation of the Local Development Plan. Engagement of new groups will be sought as early as possible in the process in an attempt to assist the Authority's search for wider community involvement.
- 9.11 The National Park Authority have a Local Development Plan Consultation Database which holds the mailing/email lists for all consultation processes throughout the Local Development Plan Review. Any individual, organisation, or group can be added to the Consultation Database so that they can be automatically kept informed at all subsequent stages of the process. To be added to this database and be kept informed of progress and opportunities to comment please email the appropriate contact information to [ldp@beacons-npa.gov.uk](mailto:ldp@beacons-npa.gov.uk).
- 9.12 Furthermore, Brecon Beacons National Park Authority consider it to be very important that all consultation bodies take into account the agreed Project Management Timetable when considering a consultation document. The consultation period will be clearly stated at the specific consultation stage and BBNPA requires this period to be strictly adhered to in order to prevent any unnecessary delays that could cause a divergence from the approved timetable. Any representations that are not made during the specified consultation periods may not be formally considered by the National Park Authority (Appendix 4 illustrates what is expected of the consultation bodies).

### **What you should expect from the National Park Authority**

- 9.13 Officers within the Authority are required to:
- Ensure the Local Development Plan revision process is carried out in accordance with the relevant legislation and best practice.
  - Make the best use of available resources.
  - Prepare and maintain an up to date evidence base for the revision process and identify key contextual changes that have occurred since the adoption of the first Local Development Plan in 2013.
  - Actively engage with various individuals, groups and bodies as discussed below.
  - Consolidate outcomes from this engagement, together with the evidence base and make policy recommendations for the Replacement Plan throughout the Review process to accord with the Planning Inspectorate Tests of Soundness.
  - Report findings and recommendations to members of the National Park Authority for approval at each key stage and carry out actions as instructed.
  - Conduct workshops to brief members and consultees of key stages, discuss findings and policy recommendations.
- 9.14 The Members of the National Park Authority are required to:
- Act in the best interests of the National Park as a whole.
  - Provide advice/recommendations for Officers during the preparation of key revision documents and policy options.
  - Consider the recommendations of Officers at key stages of the revision process and make decisions on behalf of the Authority.
- 9.15 Formal approval by the National Park Authority will be required at key revision stages including the Review Report, Delivery Agreement, the Preferred Strategy, Deposit proposals and final adoption.
- 9.16 Any proposed change in policy will be subject to public consultation in compliance with national policy, guidance and regulation. Policies can be ultimately added, amended or deleted from the Plan by the appointed Planning Inspector, who will examine the soundness of the Replacement Plan.

## **Equality**

- 9.17 Underpinning the Authority's ideas on community involvement is the issue of equality. Brecon Beacons National Park Authority will comply with the general duty in the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995 and is committed to ensure that hard to reach groups are incorporated into the process. For example the Authority will not discriminate against anyone on the basis of colour, ethnicity, sex, age, marital status, sexual orientation, disability, religion, language or nationality.
- 9.18 The National Park Authority is committed to ensuring that the process is accessible to everyone and is structured in a way that is easy to understand. As part of this, language will be kept simple, the issues will be easy to understand and debate, all information will be readily available to the general public through various methods and technologies, and any decisions that will be made by the Authority will be advertised in a transparent manner. Finally, consultees will have the opportunity to make their contributions in either Welsh or English, and formal consultation documents will be produced bilingually.
- 9.19 Throughout the plan preparation process and its respective consultation stages, the website will play an important interactive and informative role. It will be updated regularly and will provide an easy to use and informative resource allowing stakeholders and the general public to see how each stage has been produced and who has been involved. All documents and maps will be made

available on the website, although a variety of formats will be offered including CDs and hard copies that will be available at public libraries, the National Park offices and at Tourist Information Centres. All statutory consultees will also be provided with reference copy documents for their consideration.

### **Community Involvement Methodology**

9.20 The types of consultation techniques adopted during the plan preparation process will vary according to the respective stage of community involvement. Specific consultation methods will be tailored to suit the requirements of the differing needs of the relevant consultation bodies (see Figure 9 below). For example the various groups listed below will be used by the National Park Authority at different stages of plan preparation:

- Steering Groups;
- Working Groups;
- Member's Workshops;
- Stakeholder Group Meetings;
- Key Stakeholder Working Groups; and
- Community Panel Meetings

9.21 The function and reasons for the use of these groups is explained at Appendix 5, Consultation Techniques. The community involvement techniques above were open to feedback<sup>9</sup> at the Draft Delivery Agreement stage. This feedback included preferred methods of consultation and the aspects of the Plans each consultation body wished to be consulted on.

9.22 In addition to the above, Brecon Beacons National Park Authority also intend on working closely with town/ community councils in order to provide each council with the opportunity to be responsible for organising the consultation for their own wider community. In doing so there will be flexibility in the engagement approach they choose. This process will be carried to strict, previously approved guidelines, with an agreed consultation protocol and the requirement that each community council will produce a statement of consultation at the end of the process.

9.23 Meanwhile, a site register will be established. This register will list the candidate sites put forward to the Authority and will include the identification of those sites that accord with the Brecon Beacons National Park Authority strategy and those that do not. It is envisaged that this process will contribute to an increased transparency of plan preparation and will also lead to the allocation of the most suitable sites within the Park.

9.24 Adding to the transparency of the plan is the CAPS Uniform database that is currently in use by the National Park Authority. This facility enables the Authority to store information, including consultation outputs, in an integrated system so that any inputs to the plan can be recorded and tracked accurately. This computer system allows for public comment via a 'Public Access' module that will be posted on the National Park Authority website.

9.25 It is worth noting at this stage of the process that if, for whatever reason, a petition is collated, the Brecon Beacons National Park Authority will expect a lead name to be put forward. The National Park Authority will then respond to this lead name and not to all those registered in support of the petition.

### **Place Plans and Community Action Points**

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<sup>9</sup> In accordance with the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

- 9.26 A Place Plan is the opportunity for a community to come together and talk about what needs to happen to make a place the best it can possibly be. The purpose of a place plan is to:
- Gather evidence about an area to understand what issues the community is facing and what opportunities exist.
  - Talk to the wider community and stakeholder about how an area will develop, and what needs to be done for the future well-being of the community.
  - Agree how the community wants the different aspects of their place to be in the future.
  - Agree a plan to work towards this future, including, where relevant, policies for making decisions about planning and an action plan to set out how identified issues are going to be tackled.
  - Have the plan agreed by the community, key stakeholders and adopted by the National Park Authority, for use as Supplementary Planning Guidance.
- 9.27 The completed action points within the place plans created by communities within the Brecon Beacons National Park Authority are evidence produced by the communities themselves and can offer great benefit to the vision for a particular settlement in the National Park. The requirement to undertake a place plan is not compulsory however Hay-on-Wye and Crickhowell have completed their town plans which have been adopted as Supplementary Planning Guidance in support of the Local Development Plan. Brecon and Talgarth are currently within the early stages of their place plan preparation, undertaking local resident's surveys to gather the opinions of those living and working within their communities.
- 9.28 Through this community involvement scheme the use of place plans can offer the opportunity to ensure that the review of the Local Development Plan takes into account the vision of the Place Plans within the National Park.

### Critical Stages in Community Involvement

The stages illustrated below show the different stages at which community involvement will be necessary:

<b>Community Involvement Stage</b>	<b>Date/ Approx. Time Period</b>
Actions below undertaken at Definitive Stage of Timetable	
<b>Consultation on Draft Delivery Agreement</b>	June – August 2018
<b>Pre-Deposit Stakeholder Participation</b> <i>(On LDP &amp; SA/SEA issues inc site allocation suggestions- Involving NPA Members, Internal Stakeholders and External Stakeholders)</i>	January 2019
<b>SA/SEA/AA Scoping Report (5 Weeks)</b>	November – December 2018
<b>Pre-deposit Public Engagement</b> <i>(including community meetings and Statutory 6 week consultation on Preferred Strategy and Initial SA Report (incorporating Environmental Report &amp; initial HRA)</i>	May – June 2019

<b>Consultation on Deposit LDP (6 Weeks)</b> <i>(Including SA/ SEA Report &amp; Initial Consultation Report)</i>	July – August 2020
Actions below undertaken at Indicative Stage of Timetable	
<b>Advertisement of Focused Changes (6 Weeks)</b>	April – May 2021
<b>Submission of the LDP to WG &amp; Independent Examination</b> <i>(Including SA/ SEA Report)</i>	-April 2021 Commencement of Independent examination
<b>Publication of Inspector’s Recommendations</b>	March 2022
<b>Monitoring, review and related Supplementary Planning Guidance</b>	<i>(on going)</i>

The most readily available feedback mechanism will be via the BBNPA website ([www.beacons-npa.gov.uk](http://www.beacons-npa.gov.uk)).

### **Community Involvement at Each Stage: Why, When, Who and How?**

The following tables summarise the Community Involvement Scheme to be adopted by the BBNPA.

#### **Community Involvement Stages**

<b>Delivery Agreement [Regulation 9]</b>	
<b>Why</b>	To ensure that the Plan preparation process, including the Project Management Timetable and Community Involvement processes are realistic and appropriate. Consultation will help improvements be made to the Delivery Agreement and contribute towards an agreement with Welsh Government.
<b>When</b>	June – August 2018
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Authority members; steering group members, Welsh Government and key stakeholders;</li> <li>▪ All other consultee groups;</li> <li>▪ The planning inspectorate; and</li> <li>▪ The general public.</li> </ul>
<b>How</b>	<ul style="list-style-type: none"> <li>▪ General Consultation Bodies and Town and Community Councils will be specifically engaged regarding community involvement. This will be undertaken via questionnaires, and consultations.</li> <li>▪ Draft Delivery Agreement will be sent to statutory consultees and stakeholders for comments. A feedback form will be attached.</li> <li>▪ Other consultee groups will be notified of the draft Delivery Agreement and how to view and comment on it at libraries National Park offices and on the website.</li> <li>▪ The general public will be advised of this by press notices and advertising</li> </ul>

<b>Pre-Deposit Stakeholder Participation [Regulation 14]</b>	
<b>Why</b>	<p>Pro-active engagement to help build consensus amongst stakeholder and partner organisations on broad ranging strategic issues. This will help the Authority establish a collective vision for the Plan and eliminate unacceptable Strategic Options. Also during this time, the NPMP/LDP Steering Group will provide support in relation to the scope of the SA/SEA and HRA.</p> <p>Simultaneous to the above, BBNPA will invite suggestions on site allocations. All suggestions will be added to a Site Register.</p>
<b>When</b>	January 2019
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ NPA Members;</li> <li>▪ Key Stakeholders, Partners and Interest Groups;</li> </ul>
<b>How</b>	<ul style="list-style-type: none"> <li>▪ Member’s Workshop: Structured workshop with Committee Members to discuss BBNPA ‘Issues Papers’ and strategic options.</li> <li>▪ Stakeholder Meetings: Structured meetings with internal and external stakeholders, (possibly led by an external facilitator) - again discussing strategic options identified in BBNPA ‘Issues Papers’.</li> <li>▪ NPMP/LDP Steering Group: To discuss scope of the SA/SEA and HRA (includes environmental consultation bodies)</li> </ul>
<b>Consultation on Draft SA/SEA and HRA Scoping Report</b>	
<b>Why</b>	To ensure that the scope and methodology of the SA/SEA and HRA of the Plan is appropriate.
<b>When</b>	Between December 2018- January 2019 [for a statutory 5 Weeks]
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Authority Members; Steering Group members, and Key Stakeholders;</li> <li>▪ All other consultee groups (inc environmental consultation bodies);</li> <li>▪ The general public.</li> </ul>
<b>How</b>	<ul style="list-style-type: none"> <li>▪ Scope will be decided using NPMP/ LDP Steering Group at Pre-Deposit Stakeholder Participation Stage</li> <li>▪ Draft Scoping Report will be sent to statutory consultees and stakeholders for comments. A feedback form will be attached.</li> <li>▪ Other consultee groups will be notified of the draft DA and how to view and comment on it at libraries National Park offices and on the website.</li> <li>▪ The general public will be advised of this by press notices and advertising</li> </ul>

<b>Pre-Deposit Public Engagement [Regulation 15 &amp; 16]</b>	
<b>Why</b>	<p>Opportunity for local communities to provide an input into the Plan. This process will contribute to a public understanding of the preferred options that have emerged from the Stakeholder stages. This process also allows for suggestions of alternative options. A general consensus about preferred options is anticipated although a balance of conflicting demands may be necessary. At this stage the site register will feature as a background document.</p>

	Also to consult on Initial SA/SEA Report following the development and refining of alternatives.
<b>When</b>	May – June 2019 (Including Statutory 6 weeks consultation on Preferred Strategy)
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Local Communities;</li> <li>▪ Key Stakeholders, Local Resident Groups, Localised Interest Groups and other relevant local consultee organisations;</li> <li>▪ Environmental Consultation Bodies and;</li> <li>▪ Community Councils and the General Public.</li> </ul>
<b>How</b>	<p>Public engagement will be in a simple and inclusive manner with the Site Register featuring as a background document. Community Councils to be given opportunity to take responsibility for organising the LDP consultation for the wider community. This will allow for flexibility in the engagement approach. However the chosen process will be carried to strict, previously approved guidelines, with an agreed protocol.</p> <ul style="list-style-type: none"> <li>▪ Engagement of community councils / wider communities</li> <li>▪ BBNPA HQ Exhibition</li> <li>▪ Various Presentations as and when required</li> <li>▪ Key Stakeholders- working groups</li> <li>▪ NPMP/ LDP Steering Groups</li> <li>▪ Also use of: Website; appointments; comments sheets; reception exhibition; advertise (newspapers, news, radio, poster, newsletter, community magazines); LDP Surgery; questionnaires.</li> </ul> <p>There will also be a statutory 6 week consultation on the 'Preferred Strategy Report' (inc Site Register) and Initial SA/ Environmental Report. This will follow the above listed public engagement and will be run as follows:</p> <ul style="list-style-type: none"> <li>▪ Sent to stakeholders for comments. A feedback form will be attached;</li> <li>▪ Also publicly available at National Park Authority headquarters; Public Libraries, Tourist Information Centres and website</li> </ul>

<b>LDP Preparation</b>	
<b>Why</b>	To ensure effective consultation on development limits and potential allocations
<b>When</b>	November 2019
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Town/ Community Councils</li> <li>▪ Local Communities</li> <li>▪ Key Stakeholders</li> </ul>
<b>How</b>	NPA and Community Councils to distribute proposed settlement limits and site allocations to communities and key stakeholders for comments.

<b>Deposit Local Development Plan [Regulation 17], SA Report/ SEA Environmental Report, &amp; Initial Consultation Report</b>
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<b>Why</b>	To provide the opportunity to support or voice concerns over: <ul style="list-style-type: none"> <li>▪ The Deposit Local Development Plan;</li> <li>▪ The SA Report/ SEA Environmental Report and Appropriate Assessment; and</li> <li>▪ The Initial Consultation Report.</li> </ul>
<b>When</b>	July August 2020 [Statutory 6 Weeks, extended to 8 weeks to account for summer period]
<b>Who</b>	All consultees and general public (including environmental consultees)
<b>How</b>	Sent to statutory consultees. Press releases and adverts will highlight the opportunities to consult. Letters will be sent to stakeholders and consultee organisations. The relevant documents will be made available at Brecon Beacons National Park Authority Offices, Information Centres, and public libraries. The most readily available opportunity will be via the Brecon Beacons National Park Authority website.

**Stages Below are at indicative stages of Project Management Timetable**

<b>Focussed Changes Consultation [Regulation 20 and 21]</b>	
<b>Why</b>	To advertise proposed changes arising from Deposit consultation
<b>When</b>	April – May 2021 [Statutory 6 Weeks]
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Authority Members; Steering Group members, and Key Stakeholders;</li> <li>▪ All other consultee groups;</li> <li>▪ The general public.</li> </ul>
<b>How</b>	Sent to statutory consultees. Press releases and adverts will highlight the opportunities to consult. Letters will be sent to stakeholders and consultee organisations. The relevant documents will be made available at Brecon Beacons National Park Authority Offices, Information Centres, and public libraries. The most readily available opportunity will be via the Brecon Beacons National Park Authority website.

<b>Submission of the LDP and Independent Examination [Regulation 22 and 23]</b>	
<b>Why</b>	To determine whether any improvements can be made to the Plan's policies and proposals. To provide an impartial examination of the LDP.
<b>When</b>	May 2021- April 2022 - end of Independent Examination (dependent on details at Examination)
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Authority Members; Steering Group members, and Key Stakeholders;</li> <li>▪ All other consultee groups including environmental bodies;</li> <li>▪ The general public.</li> </ul>
<b>How</b>	Notice to be sent to all interested stakeholders of the submission of the Local

	Development Plan and associated documents to Welsh Government. Sent to statutory consultation bodies, key stakeholders and National Park Authority members. Public press notices will be utilised and copies will be made available at National Park Authority offices, public libraries, tourist information centres and on the internet. Formal notification will also be provided by letter to those who made (and not withdrawn) a representation.
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<b>Publication of Inspector's Recommendations and Adoption</b>	
<b>Why</b>	To make the Planning Inspector's recommendations (and reasons) generally available for inspection and to inform of adoption.
<b>When</b>	within 8 weeks of receipt of the Inspector's recommendations AND before the day of adoption
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Authority Members; Steering Group members, and Key Stakeholders;</li> <li>▪ All other consultee groups;</li> <li>▪ The general public.</li> </ul>
<b>How</b>	<p>Copies of the document will be made available at NPA offices, tourist information centres and at public libraries. Local press and internet facilities will be used and notice will be provided to those on request.</p> <p>Formal notification of adoption (within 8 weeks of receipt of Inspector's Report) will be provided by formal letter to Welsh Government, specific consultation bodies, general consultees, the stakeholder panel and National Park Authority members. Again copies of all relevant documents will be made available in the National Park Authority offices tourist information centres and public libraries. Notices will be placed in the local press and on the website.</p>

<b>CIS Stage 9: Monitoring Review and Related SPG [Regulation 37]</b>	
<b>Why</b>	Monitoring and review of the Local Development Plan provides the opportunity to update the Plan as appropriate. Incorporated into this monitoring is the review of Supplementary Planning Guidance notes.
<b>When</b>	<p>(Ongoing)</p> <p>Supplementary Planning Guidance produced in parallel with any Local Development Plan (or review) will be consulted on at the same time, but where Supplementary Planning Guidance is produced at a later stage, a separate and statutory 6 week consultation process will take place.</p>
<b>Who</b>	<ul style="list-style-type: none"> <li>▪ Authority Members; Steering Group members, and Key Stakeholders;</li> <li>▪ All other consultee groups;</li> <li>▪ The general public.</li> </ul>
<b>How</b>	<p>An Annual Monitoring Report will be made publicly available on the National Park Authority's website. Hard copies will also be made available at Head Quarters. Libraries and Information Centres will hold all document on disc.</p> <p>Following this annual monitoring it is envisaged that the Plan will be reviewed in its entirety every 4 years.</p>

	<p>As part of the Supplementary Planning Guidance consultation process, each piece of Supplementary Planning Guidance will be made publicly available. Once this formal consultation is complete the authority will move to amend the document and adopt the Local Development Plan.</p>
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## 10.0 Monitoring and Review

### Delivery Agreement

- 10.1 BBNPA will monitor and review the effectiveness of the approved Delivery Agreement at each stage of the Plan preparation process. This will establish whether the authority is complying with the agreements made with respect to the proposed Project Management Timetable and the Community Involvement Scheme. This process of reviewing the DA will also provide the opportunity to define the dates of the indicative stages of the Plan preparation process. This will be within 3 months of the formal 6 week deposit period and, in accordance with the current Project Management Timetable, the indicative dates of the plan preparation process will therefore be defined by April 2020
- 10.2 The DA will also be reviewed at the following stages of plan preparation:
- If the authority fails to meet timescales indicated on Project Management Timetable
  - If changes are required to the Community Involvement Scheme
  - If there are significant changes in the resources available to undertake the plan preparation
  - Following the publication of any new regulations/ guidance
  - If there are any major changes of circumstances that materially affect the assumptions, evidence, policies or proposals contained in the plan
- 10.3 Further consultation will be undertaken during the monitoring and review of the DA before Authority and WG agreement.
- 10.4 Finally, for future reference, a review of the BBNPA community involvement methodology will be undertaken to examine the successfulness of the adopted approach to consultation.

### Local Development Plan

- 10.5 Monitoring of the LDP is considered a continuous process that represents a crucial feedback loop within the cyclical process of LDP policy making. It is for this reason that, although not a new requirement, it is becoming an increasingly important aspect of policy making. In addition to this, a test of soundness against which the Inspector will assess the LDP will determine whether there are clear mechanisms for implementation and monitoring.
- 10.6 Because of the importance of the monitoring of LDPs, BBNPA will produce an Annual Monitoring Report for each plan each year following the date of its adoption. The purpose of this report will be to assess the performance of the policies and proposals of the adopted plan and to identify any requirements for review, therefore feeding into the review of the DA. This Annual Monitoring Report will be used to update reference to any relevant planning guidance and also to highlight any other important information.
- 10.7 Finally, as with previous authority publications the Annual Monitoring Report will be made publicly available both at the NPA headquarters and on the authority's website. Key issues that arise out of this will be the subject of public consultation.

- 108 Following the adoption of the LDP, BBNPA will review the Plan in its entirety on a 4 year cycle. This revision will incorporate a review of the SA/SEA baseline information and trends. In addition to this a new SA/SEA and AA will be produced for any new Plan.

## Glossary of Terms and Abbreviations

- **Alternative Site:** Representations to the Deposit LDP which suggest alternative or new site allocations which are advertised by the Council prior to the submission of the Deposit LDP to the Inspector
- **Annual Monitoring Report (AMR):** This will assess the extent to which policies in the LDP are being successfully implemented
- **Appropriate Assessment (AA):** Assessment of any land use Plan's impact on the conservation objectives of a European Site as required by the Habitats Directive 92/43/EEC
- **Baseline:** A description of the present state of an area
- **Candidate Site:** Site put forward to the Authority for inclusion in the LDP.
- **Citizens Panel:** A dialogue method whereby a randomly selected, representational number of residents agree to be consulted on a regular basis on a range of local issues and services
- **Community Involvement [Scheme] (CIS):** Sets out the project plan and policies of the LPA, for involving communities and other stakeholders in the preparation of the LDP
- **Consensus Building:** A process of early dialogue with targeted interest groups to understand relevant viewpoints.
- **Consultation Statement:** A BBNPA document that identifies everybody who has been consulted through plan preparation and the methodology adopted. This includes justifications of any deviations from the CIS. Published at the same time as the Deposit LDP
- **Definitive Stages:** The stages in plan preparation up to and including the Statutory Deposit
- **Delivery Agreement (DA):** This document comprising the LPA's timetable and community involvement scheme (CIS) for the preparation of the LDP. Approved by WG.
- **Deposit LDP:** Formal 6 week period in which individuals and organizations can make representations on the LDP.
- **Environmental Consultation Bodies:** Bodies with environmental responsibilities concerned by the effects of implementing plans and programmes and which must be consulted under the SEA Regulations; ie Countryside Council for Wales, Environment Agency and CADW.
- **Environmental Report:** A document required by the SEA Directive, which identifies, describes and appraises the likely significant effects on the environment of implementing a plan

- **Habitats Regulations Assessment (HRA)** Process of screening, scoping and appropriate assessment of any land use Plan's impact on the conservation objectives of a European Site as required by the Habitats Directive 92/43/EEC
- **Independent Examination:** Independent inquiry to provide an impartial examination of the LDP
- **Indicative Stages:** The stages beyond the Statutory Deposit Period
- **Key Stakeholder Group:** To act as a sounding board throughout the preparation process. This group will consist of the key stakeholders involved at the pre-deposit participation stage. Ie EAW, CCW, CADW, Unitary Authorities, Community Councils. However further relevant bodies may be invited when and where appropriate.
- **Local Development Plan (LDP):** Land use plan which will form the statutory development plan for a local authority area for the purposes of the Act. Subject to independent examination.
- **Local Development Plans Wales (LDPW):** WG Planning Policy Guidance document
- **Local Development Plan Manual:** WG Planning Policy Guidance document
- **National Park Management Plan (NPMP):** The single most important policy document for the National Park. It is a plan for the geographic area of the Park and not for any one authority and, as a strategic over-arching document, it co-ordinates and integrates other plans, strategies and actions in the National Park, including the Local Development Plan.
- **Pre-Deposit Consultation:** Informal process in which comments are invited on a particular topic or draft document
- **Pre-Deposit Participation:** A process, whereby stakeholders and the community can interface with plan makers
- **Preferred Strategy:** BBNPA report outlining the preferred strategy of the NPA following Pre-Deposit participation
- **Project Management Timetable:** A realistic timetable detailing the various stages of the preparation and delivery of the Local Development Plan (LDP) and how the process of the Plan preparation will be project managed. This timetable should also state the resources that will be required at each stage.
- **Scoping:** The process of deciding the scope and level of detail of an SA, including the sustainability effects and options which need to be considered, the assessment methods to be used, and the structure and contents of the SA Report
- **Site Register:** A register of candidate sites put forward to the Authority including identification of those that accord with the BBNPA strategy and those that do not.
- **Site Specific Allocations:** Allocations of sites for specific or mixed uses or development contained in a local development plan. Policies will identify any specific requirements for individual proposals
- **Soundness:** Concept against which a LDP is examined under section 64(5)(b) of the 2004 Act

- **Stakeholder Group:** Meeting made up of those with an interest directly affected by the LDP
- **Steering Group:** Meeting attended by senior NPA members of staff, selected NPA Members and guests from agencies such as CCW and EAW. Acts as guidance for the Strategy and Policy team.
- **Strategic Environmental Assessment (SEA):** Generic term used to describe environmental assessment applied to policies, plans and programmes as required by SEA Directive 2001/42/EC
- **Supplementary Planning Guidance (SPG):** Provides supplementary information in respect of the policies in a local development plan. They must be consistent with LDP policies and national planning policy
- **Sustainability Appraisal (SA):** Tool for appraising policies to ensure they reflect sustainable development objectives
- **Sustainability Appraisal Report (SA Report):** Describes and appraises the likely effects on sustainability of implementing the Plan. S 62 (6) of the Act states that a LPA must prepare a report of the findings of the SA of the LDP.

## **Appendices**

**Appendix 1:** Risk Management: Risks; Potential Impact and; Mitigation

**Appendix 2:** What is Expected of the Consultation Bodies?

**Appendix 3:** Consultation Techniques

**Appendix 4:** Project Management Timetable.

**Appendix I LDP Risk Management & Mitigation**

<b>Risk</b>	<b>Potential Impact</b>	<b>Mitigation</b>
The publication of revised planning legislation/ guidance	Additional work / time required. Timetable slippage.	Constant monitoring of legislation/ guidance in attempt at early response.
A reduction in staff resources and budget available for the project	Timetable slippage	Flexibility built into LDP resources.
An over ambitious timetable due to greater than anticipated workload (UDP adoption/ SA/SEA requirements)	Timetable slippage	Flexibility built into Project Management Timetable
Unavailability of meetings and/ or agenda time of authority Member's meetings to consider and approve necessary documents	Timetable slippage and lack of ownership of Plan	Consideration of committee cycles in the production of the Project Management Timetable. Timetable flexibility.
Inability of printers/ translators to deliver documents in accordance with any approved timetable	Timetable slippage	Build flexibility into Timetable. Consider additional resources
A large volume or significance of responses to consultations	Timetable slippage	Encourage/ consider consultation responses as early as possible in the process
The ability of statutory consultees/ inspectorate to respond within a set timetable given resource constraints	Timetable slippage	Close liaison, including Service Level Agreement, with inspectorate to ensure early warning of potential problems. Early contact with statutory consultees to explain what is expected of them.
Failure of test of soundness	Additional work / time required. Timetable slippage.	On-going liaison with WG and environmental consultation bodies. Ensure the LDP has a robust evidence base with

		SA/SEA and its preparation is based on sound and well audited community involvement
Legal challenge	Additional work / time required. Timetable slippage. Problems with adoption of LDP	Good understanding of the requirements of legislation/ guidance.
Political Change/ elections	Timetable slippage	Flexibility built into Project Management Timetable
Lack of Engagement or limited success of engagement	Timetable slippage and a lack of ownership of the Plan	Ensure appropriate CIS is drawn up at DA stage.
Presence of an Habitats Directive site affecting the 'preferred strategy'	Additional work / time required. Timetable slippage.	No suitable mitigation

## Appendix 2: What is Expected of the Consultation Bodies?

In order for BBNPA to produce the LDP in accordance with the approved Project Management Timetable the NPA has the following expectations of its consultation bodies and stakeholders:

- **Adhering to deadlines:** BBNPA will expect responses to the consultation documents within the statutory 8 week consultation periods.
- **Commitment:** All parties should be committed to the process by attending, contributing and generally assisting in the search for consensus
- **Meeting Cycles:** Wherever possible, the cycles of meetings should be varied to enable reasonable response times
- **Pragmatism** – All parties should understand and remain pragmatic about what can be achieved within the context of relevant legislation and Assembly guidance.
- **Relevance** - Only legitimate spatial issues should be raised and valid / relevant comments made.
- **Highlight:** Highlight any data gaps in the NPA's information
- **Early Identification:** Early identification of sites to be considered for possible development including allocations within the Plan
- **Transparency:** To include all relevant information to be considered by the Inspector in a form that is accessible to all in order to increase the transparency of the process
- **Binding:** To understand that the Inspector's report is binding on the Authority and that there is no recourse for appeal in respect of the recommendations of the Inspector

**Appendix 3: Consultation Techniques**

<b>Consultation Technique</b>	<b>Explanation</b>
Feedback Forms	Pre-prepared form to be attached to consultation documents. Designed as a questionnaire to supplement the consultation documents, the feedback forms will ensure structured consultation comments to minimise inappropriate comments.
Local Media/ Press	Statutory requirement for advertising certain stages of the LDP consultation.
Newsletters	Existing newsletters will be utilised to advertise the status of the LDP and its consultation documents.
Website	Most readily available resource for consultation purposes. All documents produced at the critical stages of the process will be made available via this medium. It is also envisaged that comments may be deposited in the future
Public Availability of Documents	Statutory consultation. All documents will be made available at the NPA office, libraries and tourist information centres.
Steering Group	Meeting attended by senior NPA members of staff, selected NPA Members and guests from agencies such as NRW and Cadw Acts as guidance for the Strategy and Policy team.
BBNPA Committee	BBNPA's committee structure will be fully utilised for consideration of documents. These meetings are open to the general public
Members Workshop	Means of engaging NPA members. Focussed discussions led by a facilitator.
Stakeholder Group Meeting	Meeting made up of those with an interest directly affected by the LDP. Structured and maybe led by an external facilitator.
Public Meetings	Utilised to present information and allow discussion on issues at various stages. Provides the opportunity for people to comment on issues affecting them. Good publicity required and also

	needs to be carefully chaired.
Open-Days/ Exhibition	Used to present information and proposals. Held in accessible locations and times to allow for full opportunities for all sections of communities. Use of comment sheet boxes.
Key Stakeholder Working Groups	Selected key stakeholders to form a working group to advise on issues. Experts in different fields working together to produce a transparent Plan based on community involvement. I.e NRW, Cadw, Unitary Authorities, Community Councils. However further relevant bodies may be invited when and where appropriate.

