

Brecon Beacons National Park Authority

Brecon Beacons National Park  
Local Development Plan

Review Report

April 2018

## **1.0 The Review Process**

- 1.1 A full review of the Brecon Beacons National Park Local Development Plan (LDP) is required every four years. Given that the LDP was adopted by Members of the National Park Authority on 17<sup>th</sup> December 2013, it is now timely that the Authority commences the Review process. The purpose of the Review is to identify whether the LDP remains up to date and, if not, what revisions are required and why in order to take account of changing national and local circumstances. Part of the process also assesses how well the LDP has performed against the target indicators set out in the original monitoring framework. .
- 1.2 This Review Report is the beginning of the review process and seeks to outline the following:
- The issues that have been considered as part of the review
  - The revisions required and why, based on the evidence examined
  - The implications, if any, of the anticipated revisions on parts of the plan not changing?
  - The form of revision required – either to follow a full or short form revision procedure based on the changes that are required. A short form revision will involve a “light touch” revision where not many changes are required because the Plan remains sound for future use. A full revision involves wholesale changes to the Plan required because significant issues needing change have been highlighted – such changes will lead to a replacement plan.

## **2.0 Stakeholder Involvement**

- 2.1 The Authority has invited stakeholders to make representations on the way forward before the statutory process begins. The Authority’s Strategy and Policy Team requested early representations to be made by no later than Friday 9<sup>th</sup> February 2018 to enable consideration as part of the Review Report process and to assist in the formulation of its conclusions and recommendations. Stakeholder views were requested on what should be considered by the Authority in the Review, what kind of revisions should then be made and whether the full or short form procedure should be followed.
- 2.2 The issues raised by the various stakeholders are summarised as follows:
- Numerous proposals for housing allocations
  - Proposal to extend area of one allocation
  - Concerns relating to appropriateness of some existing housing and mixed use allocations
  - Vacant units in Retail Centres
  - Concern with effectiveness of tourism policies
  - Concern that the current Plan does not provide sufficient control over development (particularly intensive poultry and tourism development) in the open countryside
  - Boundaries of settlements should be reconsidered
  - Highway issues in Brecon
  - Possible brown-field sites could come forward in Brecon
  - Possible alternative use for existing mixed use allocation
  - The viability of policy level affordable housing contributions
  - Reinforce Statutory Purposes

- 30 dwellings per hectare policy not being met
- 4.8 year land supply suggests housing is not being delivered
- Community-led housing should be promoted
- Change of strategy required to promote economic development in Crickhowell
- Evidence base requires updating
- Full Review required
- Short-form Review appropriate
- Small scale rural housing development vital to communities
- Undeveloped allocations should be de-allocated
- Consideration of Growth Deal for Mid Wales and the Growing Mid Wales Partnership required
- Consider requirements of Powys LDP
- Consider implications of new legislation
- LDP could be more supportive of many forms of small renewable energy projects
- Housing needs of ageing population
- Policy to retain affordable housing commuted sums should be revisited
- Impact of Brexit should be considered
- Some large allocated housing sites have not been delivered
- Address empty housing stock
- Worthwhile factoring in an extension to the Plan period given that there are only 4 years remaining on the current Plan)
- The Vision of the LDP remains highly relevant and balances the many roles of the Authority.
- The Brecon Beacons National Park will continue to be a living working landscape with many uses, where development will be sustainable and compatible with the statutory National Park purposes
- The following elements of the vision remain pertinent, we would expect these as a minimum:
  - Continues to be recognised internationally for its value as a protected area, whose character continues to be shaped by the long-standing interactions between people and the processes of nature
  - Continues to be widely acclaimed for its natural beauty, geodiversity, biodiversity, and cultural heritage which are being conserved and enhanced by its stakeholders through traditional and innovative means
  - Continues to be a sought-after destination providing an outstanding variety of sustainable opportunities for all to understand and enjoy its tranquillity, rural character, Welsh way of life, sense of remoteness, and other special qualities
  - Promotes an approach to development which ensure that the National Park of the future is able to be resilient, open and responsive to change – particularly climate change – and can be proactive in mitigating and adapting to the effects of undesirable change.
  - Promotes an approach to development which enables our communities to be less dependent upon external supply chains leading to increased food and energy security locally, improved quality of life, community cohesion and conservation of natural capital
  - Continues to be a living landscape where innovative approaches to sustainable development and renewable energy are encouraged and tested for the benefit of the environment, the economy and local communities

- Managed sustainably through active partnerships among the Park's stakeholders so that it continues to be a source of inspiration and enjoyment for future generations.
- In order to implement the Spatial Strategy we support the "Hub and Cluster" approach which is predicated on a small number of larger settlements forming service hubs for their wider catchment with large brownfield sites siting alongside where appropriate. We consider that it remains an appropriate basis for the LDP moving forward but are of the view that allocations should be reviewed both in terms of progress being made and the contribution that they can make.
- Advice issued by the Welsh Government to Local Authorities concerning use of its household projections has cautioned against reliance solely upon short term projections. Therefore in any future review a range of scenarios must be assessed along with the implications that they would have.
- It may be necessary to consider B use allocations for other employment generating land uses for instance leisure, healthcare, C2 accommodation etc subject to identified needs.
- There should not be a reduction in the housing requirement figure and a greater emphasis should be placed on the contribution Level 2 Settlements could make to the overall housing provision – directing growth to areas where there are existing employment opportunities, a high level of services and facilities and excellent school provision.
- Govilon is an important strategic settlement and is capable of accommodating future development needs

### **3.0 Background Papers**

- 3.1 The Authority has updated some of the original Background Papers that were prepared as part of the evidence base for the 2007-2022 LDP. A list of Background Papers prepared by the Authority as evidence to support the statements in this report together with other evidence documents is included in Appendix 1. These are available to view on the Authority's web site. Other Background Papers prepared for the 2007-2022 LDP remain relevant but are not critical for this Review Report. In due course, as the revision process proceeds, they will be updated and amended as required.
- 3.2 This report also highlights the need to obtain further information which will be gathered as the revision process progresses. Additional evidence will be gathered, if deemed necessary, to justify the changes proposed.
- 3.3 This Review Report will form part of the background evidence when the LDP, as revised, is submitted for Public Examination in due course.

### **4.0 What has been considered?**

- 4.1 It is reasonable and logical to start a Review by investigating the performance of the LDP against the published Annual Monitoring Reports (AMRs). Since the adoption of the LDP in December 2013, the Authority has submitted 3no. AMRs to the Welsh Government – the first of which provided additional monitoring of the 'partial year' period between 17<sup>th</sup> December 2013 and 31<sup>st</sup> March 2014 as well as the full year between 1<sup>st</sup> April 2014 and 31<sup>st</sup> March 2015.

- 4.2 The AMRs are fundamental in assessing the progress of the LDP in implementing the policies contained within the plan and will allow the Authority the opportunity to assess the Policies against the most up-to-date information available and to identify potential areas of change during the 4 year reviews.
- 4.3 The monitoring exercise can assist the National Park to:
- Identify where certain policies are not being successful in delivering their intended objective;
  - Identify gaps in the evidence base, perhaps through a change in the economy, which need to be addressed and reflected in the LDP;
  - Identify areas of success which could be used as an example for change throughout the LDP;
  - State the intended actions that the National Park will take in rectifying any issues to ensure the successful implementation of the policy or any revision that needs to take place.
- 4.4 The National Park has constructed a set of targets and indicators which act as a benchmark against which performance can be measured. Targets may relate to the achievement of certain levels of development and may be set annually or at an interim point within the plan period. The target for the whole of the plan is to achieve the implementation of the LDP Strategy.
- 4.5 It is considered that the monitoring undertaken to date is beginning to show a trend and the following general conclusions can now be drawn:
- Whilst the Authority considers that the existing strategy is the correct approach and could be rolled forward for an extended time period, it would be prudent to undertake a Preferred Strategy exercise in order to consider alternatives. The failure of the Authority to maintain a 5 year housing land supply (by just 0.2 years) has cast some doubt over the existing strategy. However, it is reasonable to suggest that the water infrastructure constraints in the Primary Key Settlement of Brecon has clearly been the most significant factor rather than the existing strategy.
  - Rolling forward the time period of the Plan to 2032 will necessitate the identification of additional allocations in line with the identified Preferred Strategy.
  - The number of units of affordable housing in terms of both consents and completions meets the targets set out in the monitoring framework.
  - Some consideration has to be given to the Dwelling Density policy. Whilst a target of 30 dwellings per hectare is achievable in some cases, it may be prudent for the Authority to consider bespoke deliverable numbers for each allocation at the candidate site stage. This will be dependent on the specific constraints of each site and its surroundings and will likely result in allocations of varying densities.
  - Employment completions within allocated sites has met the target set out in the monitoring framework. Furthermore, there has been zero loss of existing employment land as a result of the protection afforded to these sites by the policies of the Plan.

- There have been 36 permissions for renewable energy schemes since the adoption of the Plan, the majority of which have been for small hydro schemes.
- There has been a small number of departures from the Plan since its adoption in December 2013. However, it was determined on each occasion that the material considerations outweighed the policy presumption against the particular developments. Furthermore, there have been no significant developments permitted which serve to undermine the statutory purposes of the National Park or the strategic policies of the Plan.
- It is considered that the LDP policies have been effective in determining planning applications, enforcement cases and in defending appeals.
- Most of the policies in the plan have been used and there is not considered to be a policy vacuum.

4.6 In order to obtain a more detailed understanding of possible changes required, each chapter of the LDP is now considered below, set out in turn, to indicate in more detail what has been considered and what possible revisions may be required. In addition to the evidence provided by the AMRs, the following sections have also been supported by information arising from a series of Officer Workshops (including DM, Strategy and Policy and Enforcement Officers as well as Ecology and Heritage Specialists) and engagement with the Authority's Local Development Plan Member Working Group. The worksheets arising from this process are provided at Appendix 2.

4.7 The key for the AMR tables set out in the following chapters is as follows:

|                                  |  |
|----------------------------------|--|
| <b>On target/complete</b>        |  |
| <b>Further research required</b> |  |
| <b>LDP/Policy Review</b>         |  |
| <b>Ceased monitoring</b>         |  |

## 5.0 The Issues

5.1 The LDP aims to be strategic in nature and locally distinctive, centring around a cohesive Spatial Strategy which aims to address issues associated with land use planning within the National Park Context. These issues are summarised as follows

**Table 1**

| <b>Summary of Key Issues facing the Brecon Beacons National Park<br/>Local Development Plan</b> |   |
|---|---|
| <b>a. National Park Purposes and Special Qualities</b>  | The effect of development on NP and its special qualities, particularly the <b>landscape, geodiversity, biodiversity and cultural heritage.</b> |

|   |  |
|---|--|
| <p><b>b. Sustainability and Climate Change</b></p>                        | <p>The requirement to adapt and mitigate against the effects of <b>climate change</b> and peak oil through <b>sustainable development</b> and <b>renewable energy production</b>.</p> <p>Sustainability to underpin the BBNPA LDP.</p> |
| <p><b>c. Potential/ Capacity for growth</b></p>                           | <p>The capacity for growth in terms of the following:</p> <ul style="list-style-type: none"> <li>• Environmental Constraints</li> <li>• Infrastructure</li> <li>• Utilities</li> </ul>   |
| <p><b>d. Housing, including Affordable Housing</b></p>                    | <p>The need to provide a <b>mix of dwelling types</b> to meet the housing needs of the Park and in particular the need to meet <b>affordable housing</b> needs.</p>  |
| <p><b>e. Economic Development, including Employment opportunities</b></p> | <p>Need for local <b>employment opportunities</b> and <b>links with housing</b> provision.</p>   |
| <p><b>f. Thriving Communities</b></p>                                     | <p>Need for natural growth of rural villages to allow for increased community vitality and <b>quality of life</b>.</p>   |

(Source: Table 1.1 BBNP LDP (page 2))

5.2 The Key Issues have been responded to in the context of the National Park purposes of designation as defined by section 61 of the Environment Act 1995 and underpinned by the Sandford Principle.

- **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.’

5.3 Section 62 of the Environment Act also places a duty on the Authority to “foster the economic and social well-being of local communities, within the National Park” and this duty should be fulfilled in the pursuit of the National Park purposes.

5.4 The purposes of the National Park have remained the same although at the time of writing the report on National Landscapes: Realising their Potential has recommended to the Welsh Government amending the purposes and adding a third to support sustainable economic development. It is not considered that the changes proposed would fundamentally change the LDP but would further support the existing vision and objectives. In any event, it is not

possible, in advance, to second guess when or if the new Purposes will be statutorily adopted before the LDP Review process is complete.

5.5 To this end, the issues set out above remain relevant and can be carried forward unchanged.

## 6.0 The Vision and Objectives for the Brecon Beacons National Park

6.1 The existing vision for the National Park as set out at paragraph 2.1.3 (The National Park Management Plan (NPMP) Vision) of the LDP is projected to 2030. Whilst it doesn't extend to the proposed end of the revised plan period (2032), it remains relevant and strikes the right balance between protecting the environment, engaging communities and fostering economic prosperity.

6.2 The National Park Management Plan is the overarching vision for the National Park as a whole. Because the NPMP coordinates and integrates other plans, strategies and actions in the National Park it is able to provide a framework for the LDP and many of its aims and objectives are similar to those in the LDP. The LDP Vision therefore seeks to translate the NPMP Vision into a vision which addresses those areas which the Authority is able to address through the LDP process (set out at paragraph 2.2.1 of the LDP).

6.3 A "summary vision" is set out at paragraph 2.2.2 of the LDP and worded as follows:

***"The LDP will seek to ensure that...The Brecon Beacons will be a place where the wildlife, natural beauty, cultural heritage and special qualities of the National Park are protected and enhanced for future generations. Everyone who lives, works or visits the Park will experience a prosperous and vibrant area, while the impact on the local and global environment is minimised to acceptable levels."***

6.4 Given the overarching nature of the NPMP, it is suggested that its vision and, accordingly, the existing vision of the LDP remain relevant and will therefore be retained in their present form.

6.5 In order to achieve the Vision for the Brecon Beacons National Park, 25no. Strategic Objectives were developed. These objectives form the core of the LDP from which all Strategy and Policy positions have been devised. The Authority has aimed to ensure that the LDP objectives translate the statutory purpose and duty of designation in their aim and focus. These objectives, as set out at paragraph 2.3.2, all remain relevant and are proposed to be retained.

## 7.0 Overarching Policies

7.1 These are policies which set out the strategic themes of the Preferred Strategy. These policies seek to:-

- put the National Park purposes at the heart of everything the LDP is seeking to achieve
- promote addressing and limiting the effects of climate change as a key theme

7.2 The following strategic policies are relevant in this regard:

- SP1 – National Park Policy
- SP2 – Major Development in the National Park
- SP3 – Environmental Protection



- SP4 – Climate Change
- SP11 – Sustainable Design
- SP9 – Renewable Energy

7.3 Annual monitoring of the LDP has yielded positive results in terms of indicators relating to the above strategic policies and the relevant associated detailed policies. Figures 19 to 32 in the Authority's 3no. LDP Annual Monitoring Reports demonstrates positive performance in this regard and can be summarised as follows:

| Figure | Title of Indicator   | Performance (Dec 2013 – April 2017)  |
|--------|--|--|
| 19     | Land in the Countryside lost to development by way of departure from CYD LP1   | 2 temporary consents   |
| 20     | Development with an adverse impact on historic landscape designations  | None   |
| 21     | Development with an adverse impact on designated sites for nature conservation   | None   |
| 22     | Development with an adverse impact on:<br>- Listed Building<br>- Conservation Area<br>- Area of Archaeological Significance<br>- Historic Landscape, Park and Garden | 2 permissions granted that were considered to have a very minor impact upon a conservation area.   |
| 23     | Number of Conservation Areas with up to date Appraisals  | 3 Conservation Areas (Brecon, Hay-On-Wye and Talgarth) have up to date appraisals. Work is due to commence on the Crickhowell and Llangattock Conservation Area Appraisal in 2018. |
| 24     | Production of Supplementary Planning Guidance in relation to:<br>- Obtrusive Lighting<br>- Biodiversity Audit  | Completed  |
| 25     | Development in C1 and C2 flood areas not meeting TAN 15 tests  | None   |
| 26     | Planning consents granted contrary to advice of NRW and DCWW regarding water quality/quantity  | None   |
| 27     | Number of applications which consider climate change adaptation techniques within Design and Access Statements   | All major applications requiring DAS consider this issue.  |
| 28     | Number of applications for larger developments that fail to provide 20% of their energy from low or zero carbon resources.   | Ceased monitoring due to indicator appearing in monitoring framework in error  |
| 29     | Development of renewable energy schemes  | 26 permissions granted   |
| 30     | Permitted and installed capacity (MW) of renewable electricity and heat projects   | Permissions amount to a total of 0.73MW from renewable energy schemes  |

|    |  |                  |
|----|--|------------------|
| 31 | Ecological footprint of listed settlements   | Data unavailable |
| 32 | Production of Supplementary Planning Guidance in relation to:<br>- Sustainable Development in the National Parks of Wales<br>- Small Scale Renewable Energy Developments | Completed        |

7.4 It can be concluded from the Authority's annual reporting that the LDP has been successful in putting the Park Purposes at the heart of everything we do and that we have attempted to address climate change as a key theme.

7.5 To supplement the annual monitoring evidence gathered since the adoption of the LDP in 2013, a series of Officer Workshops were held in order to consider any issues experienced in implementing current LDP policy. Relevant to the 'Overarching Policies' chapter of the LDP were the workshops held in relation to the following:

- Ecology and Biodiversity
- Heritage

7.6 The workshops resulted in the following issues being identified in terms of the implementation of existing policies:

**Ecology:**

- Issues with Implementing:
- Policy 3 – uncertainty over implications of Brexit
- Policies 3 and 4 are covered by national policy and legislation - not now necessary
- Policy 6 – protection, enhancement and management of existing habitats (insufficient reference in terms of resilience).

**Heritage:**

- Policy 18 Protection of Buildings of Local Importance - No specific issues identified; however so far the buildings identified are mostly in conservation areas while other buildings of interest but not listed in settlements without a conservation area or in the open countryside are not covered by the policy. Policy 1 has been useful to refer to in cases where a non-designated heritage asset is being developed.
- Policy 26 Demolition and Replacement of Dwellings - The policy has relevance to non-designated historic assets and potential loss if replacement dwelling sought. The policy currently allows for replacement if the existing dwelling is of 'no particular architectural and /or historic and/or visual merit, for which it should be conserved'. The use of 'particular' could be open to challenge especially with a vernacular building. Possibly re-word so that the building's contribution to cultural heritage is part of the assessment of interest.

7.7 Set out at Appendix 2 are the recommendations of the workshops to address the issues set out above as well as changes to national policy arising since the adoption of the current Plan in December 2013. It should be noted that proposed changes are relatively minor, which

reflects the relative good performance of the policies of this part of the Plan as set out in the 3no. Annual Monitoring Reports published since its adoption.

- 7.8 It should be noted that the Authority is in the process of commissioning consultants to gather evidence setting out the Renewable Energy Development responsibilities for the Park Area up to 2032. Clearly, the Authority may seek to amend existing policy and, possibly, add additional policy in light of this evidence.

## 8.0 Spatial Strategy

- 8.1 The Spatial Strategy is the spatial expression of the Environmental Capacity Approach to development that underpins this LDP (as set out in Chapter 2). The Environmental Capacity Approach seeks to ensure that future development enabled through the LDP complies with the National Park Statutory Purposes and Duty. As such 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, taking into consideration the need to mitigate for the future likely and predicted effects of climate change. The Spatial Strategy has been developed through application of the Environmental Capacity Approach to the consideration of the scale and distribution of future development.

- 8.2 In setting out the Spatial Strategy the National Park has taken direction from the Vision for Central Wales as set out by the Wales Spatial Plan. This vision promotes dynamic models of rural sustainable development, resilient to the challenges and open to the opportunities of climate change whilst recognising the importance of maintaining and enhancing local distinctiveness.

- 8.3 In achieving this vision the Wales Spatial Plan sets out a Hub and Cluster approach to spatial development, identifying Key Settlements which act as service centres to the region. The Hub and Cluster approach is supported in its purpose to encourage collaborative working amongst communities to support their own need and those of their dependent Settlements.

- 8.4 The Hub and Cluster area which relates to the National Park is the “Brecon Beacons Cluster” and this comprises the following National Park settlements:

|         |   |                          |
|---------|---|--------------------------|
| Hub     | - | Brecon                   |
| Cluster | - | Talgarth                 |
|         | - | Hay-On-Wye               |
|         | - | Crickhowell              |
|         | - | Sennybridge and Defynnog |

- 8.5 In determining the spatial distribution of growth, the LDP sets out a hierarchy of Settlement types. The first two levels of the settlement hierarchy comprise of:

- Settlements acting as strategic centres within the Brecon Beacons Cluster as set out by the Wales Spatial Plan
- Settlements identified by the NPA as performing a strategic function within the region

- 8.6 Outside of the Key Settlements there are a number of smaller settlements and hamlets which, taken in combination, house approximately half our resident population. Although these

settlements are not named within the Wales Spatial Plan, locally they have an important role to play in the continued vitality of the National Park. The National Park Authority considers that the development of these communities has a significant role in ensuring the future sustainability and climate change resilience of our communities. The National Park Authority has worked closely with communities to identify local issues for the LDP to address. This work has given communities the opportunity to define for themselves the role and function of the settlement they live in, and also, help identify appropriate levels of growth to address their issues in keeping with National Park purposes and the Environmental Capacity Approach. In order to ensure that our communities outside of Key Settlements develop in accordance with their own objectives a further three layers of the hierarchy have been developed:

- Level 3 Settlements
- Level 4 Limited Growth Settlements
- Level 5 Countryside

8.7 The following strategic policy is relevant in this regard:

- SP10 – Sustainable Distribution of Development

8.8 Annual monitoring of the LDP has yielded positive results in terms of indicators relating to the above strategic policy and the relevant associated detailed policies. Figures 3, 16, 17 and 18 in the Authority’s 3no. LDP Annual Monitoring Reports demonstrates positive performance in this regard and can be summarised as follows:

| Figure | Title of Indicator  | Performance (Dec 2013 – April 2017)   |
|--------|---|---|
| 3      | Number of housing units granted planning permission in each settlement tier             | <p>A total of 499 dwellings have been granted planning permission. 209 of which have been located in the Primary Key and Key Settlements, which equates to 42% (8% below target).</p> <p>The main constraint in this regard has been the lack of water infrastructure capacity in the Primary Key Settlement of Brecon, which is due to be addressed by March 2018.</p> <p>In terms of completions, a total of 23 were completed in the Primary Key and Key Settlements with a further 99 in Level 3 Settlements.</p> |
| 16     | Employment development in Sennybridge and Defynnog                                      | None.   |
| 17     | Employment development in Hay-On-Wye  | 1 permission for employment generating development  |
| 18     | Production of Supplementary Planning Guidance in relation to:<br>- Farm Diversification | Completed   |

- 8.9 Whilst the distribution of growth has not wholly reflected the aspirations of the LDP, it is reasonable to suggest that the water infrastructure issue is the main factor in the % of growth in Primary Key and Key Settlements falling 8% below the target of 50%. Of course, this is a matter beyond the control of the Authority.
- 8.10 Additional evidence has been gathered in relation to updating the ‘Sustainability Indexing’ of all settlements within the Park Area. It is reasonable to suggest that the sustainability of the Park’s settlements has not changed dramatically. This is, however, with the exception of Trecastle (Level 4 Limited Growth Settlement), which returned a lower score due to the reduction of the bus service.
- 8.11 The National Development Framework (NDF) which will be the national land use development plan that sets out the Welsh Government’s social, economic and environmental spatial planning objectives for the next 20 years is yet to be prepared. The Wales Spatial Plan, which has informed the spatial strategy of the plan, will remain applicable until the NDF is adopted.
- 8.12 To this end, it is suggested at this stage that the Settlement Hierarchy set out in the LDP is unlikely to change significantly for the following reasons:
- Reflects current national policy
  - Due to water infrastructure constraints, sufficient opportunity has not been provided for Brecon to fulfil its role as the Primary Key Settlement
- 8.13 Notwithstanding this, the Authority will give due consideration to alternatives as part of a comprehensive Preferred Strategy exercise.

## 9.0 Housing

- 9.1 The identified housing requirement for the Brecon Beacons National Park is set out in ‘Policy 24’ (1990 dwellings), whilst Policy SP5 sets out the level of housing to be delivered during the plan period (2045 dwellings between 2007 and 2022).
- 9.2 Annual monitoring of the LDP has yielded relatively positive results in terms of indicators relating to the above strategic policy. However, the main areas for concern are the relatively low level of completions in comparison to consents and the land supply falling below the 5 year threshold. Figures 1 to 13 in the Authority’s 3no. LDP Annual Monitoring Reports demonstrates positive performance in this regard and can be summarised as follows:

| Figure | Title of Indicator   | Performance (Dec 2013 – April 2017)  |
|--------|--|--|
| 1      | Maintain a 5 year housing land supply  | The Authority’s 2017 JHLAS study confirmed a 4.8 year supply               |
| 2      | The number of dwellings granted and completed annually                                     | Total of 499 granted planning permission<br>Total of 219 completed         |
| 4      | Number of dwellings granted consent on mixed-use sites                                     | 68 dwellings granted consent   |
| 5      | All applications granted planning consent to achieve a density of 30 dwellings per hectare | 13 from 70 planning permissions granted planning permission at 30+dph      |
| 6      | Affordable Housing percentage target   | Land Registry house price index for Merthyr Tydfil suggests that there has |

|    |   |  |
|----|---|--|
|    |   | been a +1.4% change in house prices for the period of this AMR.  |
| 7  | Number of affordable dwellings granted planning consent   | 132 affordable dwellings granted planning consent<br><br>It should also be noted that commuted sums 'committed to' from planning permissions since the adoption of the LDP exceeds £1m |
| 8  | Number of affordable dwellings completed  | 71 affordable dwellings completed  |
| 10 | Number of affordable windfall dwellings   | Total of 46 windfall dwellings granted consent   |
| 11 | Number of affordable dwellings on exception sites   | None   |
| 12 | Occupation of Allocated Gypsy and Traveller site  | Completed  |
| 13 | Production of Supplementary Planning Guidance in relation to:<br>- Affordable Housing<br>- Planning Obligations Strategy<br>- CYD LP1: Appropriate Development in the Countryside | Completed  |

- 9.3 Lichfields and Andrew Golland Associates have been commissioned by the Authority to update our housing need and viability evidence (respectively).
- 9.4 Whilst this work has not been completed to date, it is reasonable to suggest that, based on the most recent household projections, the housing requirement will remain in the region of 2000 dwellings for the 15 year plan period. There are, however, likely to be some changes to the sub-market areas and, accordingly, the levels of affordable housing contributions required.
- 9.5 This evidence is due to be completed by summer 2018 in readiness for our scheduled call for candidate sites.
- 9.6 In terms of known proposed policy changes, it is reasonable to expect a change to Policy 61 which requires housing development to achieve 30 dwellings per hectare (where appropriate). It is suggested that the wording of this policy will have to be responsive to the results of the candidate site process which will have a far heavier focus on the deliverability of housing sites. To this end, it is likely that the indicative number for each allocation is likely to be more bespoke (based on deliverability) rather than a broad 30 dph approach, negating the need for Policy 61 to refer to allocations. It may be appropriate that the policy, or at least the approach, is retained for the consideration of windfall development however.

## 10.0 Economic Wellbeing

- 10.1 The strategy for employment generation is to enhance the socio-economic well-being of the Park's communities which is set out through Strategic Policy 12 Economic Wellbeing. The strategy recognises that the types of economies that contribute to the economic well-being

of the National Park do not necessarily involve a large land take for general employment uses (business B1, industrial B2, and Warehousing and Distribution, B8). Working from home and live-work facilities account for an important component of B class workers, whilst non-B class activities (farming, tourism, retail etc) play a crucial role in the local economy, both in terms of direct employment and in respect of their contribution to local income and expenditure.

10.2 It is unlikely that large scale proposals would be compatible with the National Park designation. In addition, the location of the Park in relation to the South Wales Valleys and the urban areas of South East Wales mean that there is sufficient provision for such uses beyond the boundaries of the National Park.

10.3 As identified by Policy 32, the requirement for employment land within the Brecon Beacons National Park over the LDP period is 1.5ha. This requirement is to be met through the development of employment and mixed use allocations for B Class purposes.

10.4 Policy 42 seeks to implement the retail strategy set out in Strategic Policy SP13 by

- Preventing changes of use which would result in the loss of existing retail uses. Changes of use will only be permitted where the applicant is able to demonstrate either that the proposed change of use does not impact on the Retail Centre, or that there is no longer a need for a retail use.
- Encouraging a diversity of uses within town centres by ensuring that all new developments within the Retail Centre are for the following uses
  - A1: Shops
  - A2: Financial & Professional Services
  - A3: Restaurants & Cafés
  - B1: Business
  - C1: Hotels
  - D1: Non-Residential Institutions
  - D2: Assembly & Leisure

10.5 The strategy for implementing sustainable tourism development as set out above is implemented through SP 14 Sustainable Tourism.

10.6 Annual monitoring of the LDP has yielded excellent results in terms of indicators relating to the above strategic policy. Figures 14, 15, 33 and 34 in the Authority's 3no. LDP Annual Monitoring Reports demonstrates positive performance in this regard and can be summarised as follows

| Figure | Title of Indicator                                       | Performance (Dec 2013 – April 2017)  |
|--------|--|--|
| 14     | Development of employment land (0.5ha developed by 2017) | Completed  |
| 15     | Loss of employment land                                  | No permissions for non-employment uses on allocated or identified employment land. |
| 33     | Vacancy rates in the town centres                        | Brecon - 7%<br>Crickhowell – 3%<br>Hay-On-Wye – 3%<br>Talgarth – 9%                |
| 34     | Number of new or improved tourism facilities             | 21 consents granted  |

- 10.7 The Authority has commissioned Lichfields to update our Employment Land Review. Whilst this work has not been completed to date, it is reasonable to expect that approximately 2 hectares of employment land will be required to be allocated up to 2032. Again, this work is expected to be completed in readiness for the call for candidate sites scheduled for summer 2018.
- 10.8 Employment was one of the policy areas considered as part of the officer workshops exercise. The following issues were identified in terms of the implementation of LDP Policy in this regard:
- Policy 35, 36 and 37**
- Restrictions to any employment generating use class which is not B1, B2, B8 in countryside locations.
- 10.9 Set out at Appendix 2 are the results of the workshop sessions. Once again, it should be noted that proposed changes are very minor in that they only seek to broaden the definition of 'employment' to consider non-B Class uses. It is reasonable to suggest that this reflects and is a proportionate response to the effective performance of the policies of this part of the Plan as set out in the Annual Monitoring Reports.
- 10.10 The Authority has prepared an updated issues paper relating to Retail in the town centres. It concludes that growth in internet shopping and banking is likely to continue as superfast broadband becomes more widespread in more rural areas, this could impact further on comparison shops within the National Park.
- 10.11 The issues paper continues to identify Brecon as the main retail centre within the Brecon Beacons National Park, followed closely by Hay on Wye, then Crickhowell and Talgarth respectively. The paper also identifies that there is a continuing need to maintain and enhance their vitality and attractiveness not only for visitors but also the resident population.
- 10.12 In line with Planning Policy Wales Chapter 10, consideration should be given to retaining the policy which requires applicants to apply for planning permission to convert shops to non-retail uses, e.g. residential use, to demonstrate that it is not possible to maintain its use as a shop or that it has been advertised for sale as a shop for a specified period and that no serious offers have been forthcoming.
- 10.13 SP13 is the Retail Strategy for the current Local Development Plan (Adopted December 2013). The retail strategy of the LDP is to maintain and enhance the vitality and viability of the identified retail centres and to support proposals which contribute to the regeneration of the Town Centres by;
- a) Safeguarding existing retail uses in the Retail Centres;
  - b) Maintaining and enhancing the diversity of uses in the identified Retail Centres.
- 10.14 Policy 42 (Development in Retail Centres) details appropriate development within Retail Centres in the National Park. This policy aims to prevent changes of use which would result in the loss of existing retail uses. Such applications would only be permitted where the applicant is able to demonstrate either that the proposed change of use does not impact on the Retail Centre, or that there is no longer a need for a retail use. The policy also encourages a diversity



of uses within town centres by ensuring that all new developments within the Retail Centre are for the following uses:

- A1: Shops
- A2: Financial and Professional Services
- A3: Restaurants and Cafes
- B1: Business
- C1: Hotels
- D1: Non-Residential Institutions
- D2: Assembly and Leisure

10.15 Policy 42 also ensures that all changes of use that occur within the retail centre are for use classes A1, A2, A3, B1, C1, D1 or D2.

10.16 When considering the evidence presented in the background paper, along with the findings from recent Retail Centre Surveys, a list of aims has been produced in relation to retail and the retail need within the Brecon Beacons National Park:

- To maintain and encourage the vitality and viability of the town centres within the Brecon Beacons National Park.
- Encourage development which contributes to the creation of sustainable places.
- To be responsive to current issues and pro-active to any trends that seem to be appearing.
- Be responsive to the vacancy rates within the retail centres.
- Promote established town centres as the most appropriate locations for retailing, thus trying to combat growing dependency on the private car.
- Be clear about the future roles of the existing centres, especially Hay-on-Wye given its specialist function as a book town.
- Ensure that the change of use of A1 units to A3 units are robustly justified with the appropriate level of information.
- Manage the number streets made up of predominantly C3 dwellings situated within the retail centre, particularly Bell Street in Talgarth and Tower Street in Crickhowell.
- Protect the change of use of retail units into C3 Residential Dwellings.
- Ensure the shops situated in level 3 and 4 settlements, along with countryside locations are protected by policy 43 to maintain the sustainability of the rural locations.
- Extend Brecon Retail Centre to include and protect the retail function of Rich Way, The Watton.

10.17 Moreover, Retail was also one of the topics of the recent officer workshop sessions. To supplement the conclusions of the background paper, the issues identified with the implementation of Policy 42 since the adoption of the Plan were as follows:

- Dealing with applications for the change of use of A1 units to other use classes appropriate to retail centres and the length of time the property should be marketed.
- Confusion in relation to the mixed use of A1 and other uses but predominantly A3 in the retail centre.

- 10.18 Set out at Appendix 2 are the recommendations of the workshops to address the issues set out above as well as changes to national policy arising since the adoption of the current Plan in December 2013. It should be noted again that proposed changes are relatively minor in that they seek to deal with issues relating to duration of marketing, consideration of duration of vacancy and the consideration of the introduction of primary and secondary retail frontages.
- 10.19 Turning to Tourism, it should be noted that the Authority adopted a new Tourism Strategy (2017-2022) last year which is available to view via the following link: <http://www.beacons-mpa.gov.uk/communities/tourism/sustainable-tourism-strategy/>. The 2017 Visitor Survey can also be viewed via the following link: <http://www.beacons-mpa.gov.uk/wp-content/uploads/Brecon-Beacons-Visitor-Survey-Final-report-May-2017-English-.pdf>
- 10.20 Again, this formed the subject of one of the officer workshop sessions and the main issue identified was that the policy approach is overly restrictive. In response, changes were suggested to Policies 45, 46 and 47 to enable extension to existing tourism businesses and new development in the countryside; enable new buildings to help facilitate low-impact tourism development where there are no landscape or biodiversity issues; and, enable in some instances year-round low impact tourism development where they can be successfully integrated into the 'winter landscape'. These recommendations are set out in full at Appendix 2.

## 11.0 Provision of Services and Facilities

- 11.1 The Annual Monitoring Reports have yielded positive results in relation to this chapter of the Plan (as set out below). In line with the requirements of Strategic Policy 15, the Authority will continue to ensure that all new development continues to support community sustainability.

| Figure | Title of Indicator  | Performance (Dec 2013 – April 2017)                           |
|--------|---|---|
| 35     | Number of applications approved resulting in the loss of community facilities | None  |
| 36     | Amount of new development providing SUDS                                      | All relevant applications considered the requirement for SUDS |

- 11.2 At this stage, there are no significant policy changes proposed other than in relation to Policy 61 Dwelling Density, which is addressed in the 'Housing' section of this Review Report. To this end, the Authority will update its evidence in relation to the following and will consider suitable policy responses as is appropriate:

- The Welsh Language
- Planning Obligations Strategy

## 12.0 Waste

- 12.1 The Authority is not the responsible waste authority as this lies with the constituent unitary authorities and Natural Resources Wales as the regulator. The Authority is, however, required to:

- Accommodate local community waste facilities serving the National Park area only
- To liaise with adjoining waste planning authorities to accommodate facilities which cover both the National Park area and the Unitary Authority area to be sited outside the National Park.

12.2 The relevant Annual Monitoring Report indicators and the relevant performance is set out below:

| Figure | Title of Indicator  | Performance (Dec 2013 – April 2017)                            |
|--------|---|--|
| 37     | Amount of vacant units within the identified B Class sites suitable to accommodate a local waste facility | Total of 4 suitable vacant units totalling 675.7m <sup>2</sup> |
| 38     | Number of new licensed waste management facilities permitted  | None.  |

12.3 It is noted that no new facilities have been proposed within the National Park and that space exists within existing employment sites to accommodate waste management development proposals. To this end, it is considered that this section of the Plan has provided a suitable basis for planning for waste and no significant changes are envisaged at this stage.

### 13.0 Sustainable Use of Mineral Resources

13.1 The relevant Annual Monitoring Report indicators and the relevant performance is set out below:

| Figure | Title of Indicator  | Performance (Dec 2013 – April 2017) |
|--------|---|-------------------------------------|
| 39     | Number of consents for permanent, sterilising development within a minerals safeguarding area | None.                               |

13.2 Again it is envisaged that there would be no significant changes to this part of the Plan as it has been successful in ensuring no permanent, sterilising development within a minerals safeguarding area.

### 14.0 Consideration of Joint Plans

14.1 At the time of writing this report, the status of Local Development Plans prepared by constituent and nearby Local Planning Authorities, as well as the other Welsh National Park Authorities is as follows:

- Powys County Council – At Examination (Inspector’s Report published)
- Monmouthshire – Adopted Plan under Review
- Carmarthenshire – Adopted Plan under Review
- Blaenau Gwent – Adopted Plan under Review
- Torfaen – Adopted Plan under Review
- Caerphilly – Replacement LDP Withdrawn
- Merthyr Tydfil – Adopted Plan under Review

- Rhondda Cynon Taf – Adopted Plan under Review
- Neath Port Talbot – Adopted (Jan 2016)
- Ceredigion – Adopted Plan under Review
- Cardiff – Adopted (Jan 2016)
- Swansea – At Examination
- Pembrokeshire – Adopted Plan under Review
- Pembrokeshire Coast National Park – Adopted Plan under Review
- Snowdonia National Park – Adopted Plan under Review

14.2 The Authority has considered the opportunity of working with adjoining authorities to prepare a joint revised or replacement LDP. However, given that the National Park is comprised of 7no. constituent unitary authorities, each with differing character and timescales for delivery, it is considered that preparing a joint plan would not be beneficial in terms of efficient timing or relevant to the purposes of the National Park.

14.3 Notwithstanding this, this would not preclude the Authority from working jointly, where opportunities arise, on gathering evidence and assessing existing, revised and potentially new policies (particularly in terms of affordable housing data, highway safety and land drainage).

## **15.0 Changes Required in a Revised Plan**

15.1 Further to the issues discussed above, it is considered that the following revisions are required to the LDP:

- To roll forward the end date of the LDP to December 2032 with a start date of December 2017.
- Consider a change of strategy (further to a ‘Preferred Strategy’ exercise)
- Finally decide upon a new Housing requirement and how this can be met through the allocation of new sites, amendments to settlement boundaries/settlement extents and the contribution from windfall sites. It is reasonable to suggest that this will have an impact upon the distribution of housing development and consequential changes to the status of some settlements within the settlement hierarchy.
- Amend Housing policies as required as well as associated text.
- Amend proposals maps as appropriate.
- Amend problematic policies arising from workshop recommendations
- Other minor update changes or minor consequential changes to policies and supporting text.

## **16.0 Reconsideration of the Sustainability Appraisal (incorporating Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA))**

16.1 Section 39 of the 2004 Act requires authorities to prepare a Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA) as part of LDP preparation. This process of assessment seeks to ensure that plans are formulated within an overarching framework of sustainable development whilst ensuring that all strategy and policy minimises

effects on the natural environment. In the formulation of the BBNPA LDP the SA/SEA process provided a safety check helping develop an area appropriate approach to sustainable development.

- 16.2 Review of the SA indicators and objectives is a key part of the Annual Monitoring Report. This process enables the Authority to determine how the LDP is performing in relation to Sustainability, it also allows review of the effectiveness of the indicators both in terms of available evidence and the information they produce.
- 16.3 The monitoring process has determined that sufficient changes have occurred since the development of the initial SA in 2008 that it will be necessary to revisit the LDP framework. This includes review of the environmental baseline and plans programmes and policies.
- 16.4 In addition to the SA/SEA the LDP was also subject to Habitats Regulations Assessment which addressed the impact of the plan against the conservation objectives of European Sites for Nature Conservation. It will be necessary to review this process of assessment as part of the LDP review.
- 16.5 To be fully effective the BBNPA will ensure that the SA/SEA and HRA are fully integrated into the LDP review and will provide input at each stage of decision making.

## **17.0 Implication of the Revision on the Rest of the LDP**

- 17.1 The majority of the changes envisaged relate to specific new policies or refining existing policies and preambles to those policies. Furthermore, any new housing sites will be required to meet the additional years of the extended Plan period. As a result, the Authority is of the view that there will be limited consequential impacts on other parts of the Plan which are not considered to be significant. It is reasonable to suggest, however, that as the review progresses some additional evidence may be required to support the process.
- 17.2 The Authority will also continue to develop Place Plans with its communities. Indeed, Officers have recently commenced work on the 5<sup>th</sup> plan within the National Park.

## **18.0 Conclusion and Revision Procedure**

- 18.1 Whilst the Authority is of the view that the existing strategy remains relevant for the reasons set out above, it is considered that the 'Full Review' procedure would, on balance, be the most appropriate method of moving forward.
- 18.2 The Authority is of the view that failure to maintain a 5 year land supply is largely due to the significant water infrastructure constraints in the Primary Key Settlement of Brecon – stifling the development of circa 96 allocated dwellings plus windfall since the adoption of the Plan.
- 18.3 The Plan has delivered against its other strategic and policy indicators as set out above. Nevertheless, the following matters have led the Authority to propose a reconsideration of the Strategy which it plans to progress throughout the latter part of 2018 and early 2019:
  - Failure to maintain a 5 year housing land supply

- The potential for consequential changes to other parts of the Plan to be cumulatively significant
- The concerns raised by contributors through the recent non-statutory consultation

## Appendices:

### Appendix 1 – List of Background Papers to be Published on Authority Website

- Draft Review Report
- Annual Monitoring Report 2016/17 (includes AMR performance from 2013/15 and 2015/16)
- Housing Need
- Employment Land Review
- Viability
- Retail
- Well-Being

### Appendix 2 – Officer Workshop Worksheets

Policy area: **Countryside** (CYD LP1) Criterion 1 a) – 30%  
MS, MG, KP, KE, RG

#### Issues with Implementing:

Regularly departing from Policy.

Does the 30% need to be in the wording of the policy? It is an arbitrary figure that lacks evidential support

Policy 27 regarding house extensions – why does this just relate to ‘privacy’? Also there is no reference to development being within curtilage

Lack of reference to ‘Residential amenity’

CYD LP1 – Criterion 1 c) is misleading in the use of the words ‘replacement of buildings’.

Consider re-wording Policy 39 – we need to know why it’s necessary – see wording in Policy 41.

#### Changes to National Policy since adoption:

PD rights changed 2013.

Although not related to a change in National Policy, BBNPA recently adopted the Householder Design Guide SPG – April 2017.

#### Suggested Changes/Comments:

Regarding the 30% in the wording of the policy – put this in SPG as guidance. Consider referencing DQR Guidance as a better way to evidence an extension. Consider rewording – possibly ‘Sensitive extension to dwellings...’. Consider adding ‘where necessary and essential small extensions to residential curtilage and extensions to car parks’, or similar.

Regarding CYD LP1 – Criterion 1 c) being misleading in the use of the words ‘replacement of buildings’ – change to ‘replacement of dwellings’.

Regarding Policy 27 – add reference to ‘amenity’ (criterion d) and include ‘within curtilage’ regarding the countryside.

Policy area: **Retail and Employment** (SP12 and SP13)

**Issues with Implementing:**

**Policy 42**

- Dealing with applications for the change of use of A1 units to other use classes appropriate to retail centres and the length of time the property should be marketed.
- Confusion in relation to the mixed use of A1 and other uses but predominantly A3 in the retail centre.

**Policy 35, 36 and 37**

- Restrictions to any employment generating use class which is not B1, B2, B8 in countryside locations.

**Changes to National Policy since adoption:**

Technical advice note 4: Retail and Commercial Development (2016) states the following:

- 'Retail and commercial primary and secondary areas and reference to poor performing retail centres due to local or national economic conditions, and frontages become characterised by persistently high vacancy rates, local planning authorities should consider applying a more flexible strategy. LPAs should decide if restricting change of use from A1 to non A1 uses in primary areas is the most effective strategy. In these circumstances over emphasis on A1 uses alone in primary areas may serve to weaken the centre's prospects of being vibrant and viable; making it more vulnerable to decline'.
- 'Changes of use can create new concentrations of single uses, such as take away food outlets, where the cumulative effects can cause local problems. Such proposals should be assessed against the development plan policies, on their contribution to diversification of the retail and commercial centre and on the cumulative effects on matters such as parking and local residential amenity.

**Suggested Changes/Comments:**

**Policy 42**

- Include the timescale of marketing required for the change of use from A1 in the policy or supporting information. The problem with this policy is that due to other vacant retail units within town centres, it is likely that the applicant will be able to market the property as a retail unit and receive little interest. Therefore the town centres are likely to become oversubscribed with A3 units.
- Do we add in a number of years that an A1 unit has been vacant and whether marketing is required?
- Primary/secondary frontages in Brecon and Hay. Extensions to retail centre in particularly Brecon.

**Policy 35, 36 and 37**

- Policies discuss general employment uses being restricted to B1, B2, B8. However this can be restrictive to other use classes which can provide employment to the local areas. This was seen through an application for a day nursery (17/14672/FUL).

Policy area: **Sustainable Tourism** (SP 14)

**Issues with Implementing:**

Too restrictive. Glan Usk needed a building for a washroom and it had to be advertised as a departure. Also, Old Rectory, Llangattock-proposal at existing established business but does not comply with policy as it is not inside the Settlement Boundary.

**Changes to National Policy since adoption:**

- TAN 23: Economic Development 2014. Account for the needs of established businesses-the LDP doesn't seem to do that.
- Well-Being and Future Generations Act 2015
- BBNPA Sustainable Tourism Strategy July 2017 - it's going to want more enabling policies.
- Also refer to the National Park Management Plan 2015 and National Park Visitor Management Plan 2015
- TAN 20: Planning and Welsh Language 2017 Policy-Is there anything there that needs incorporating into Policy 52? Would have to show a big tourist dev. didn't have a detrimental impact on the social, linguistic or cultural characteristics of the local community.

**Suggested Changes/Comments:**

**Policy 45** is currently very restrictive and could be made more flexible to allow for new or extended holiday accommodation adjacent to existing settlements or established businesses and for new development at existing countryside sites. (Ties in with TAN 23). This should follow through to Policy 46 and 47. (So if available use existing buildings, but if not subject to suitable scale, design and setting, allow for new buildings).

**Both 46 (to lesser extent) and 47** say no new buildings-all facilities should be accommodated through conversion of existing buildings. This could be too restrictive and not needed where there are no landscape or biodiversity issues. See above

**Policy 46**

Part a) should say that the proposed development (including any means of access and parking) should be fully integrated....

Should Policy 46 be 'Low Impact Sustainable Holiday Accommodation' (take out the non-permanent bit). Although shall only be allowed to stay year round if it is successfully integrated into the winter landscape.

Policy Area: **Heritage** (Policy 1 and SP3)

**Issues with Implementing:**

**Policy 18 Protection of Buildings of Local Importance**

**Issues with implementing**

No specific issues identified; however so far the buildings identified are mostly in conservation areas while other buildings of interest but not listed in settlements without a conservation area or in the open countryside are not covered by the policy. Policy 1 has been useful to refer to in cases where a non-designated heritage asset is being developed.



### **Policy 26 Demolition and Replacement of Dwellings**

The policy has relevance to non-designated historic assets and potential loss if replacement dwelling sought. The policy currently allows for replacement if the existing dwelling is of 'no particular architectural and /or historic and/or visual merit, for which it should be conserved'. The use of 'particular' could be open to challenge especially with a vernacular building. Possibly re-word so that the building's contribution to cultural heritage is part of the assessment of interest.

### **Changes to National Policy since adoption:**

#### **Policy 15 (Losted Buildings):**

- Supporting text should be amended to refer to Historic Environment (Wales) Act 2016 and the supporting guidance.
- The policy currently refers to Circular 61/96. This has now been replaced with TAN 24 and a suite of supporting guidance. 'Managing Change to Listed Buildings in Wales' is the key guidance document relevant to this policy.

#### **Policy 16 (Demolition of Listed Buildings):**

- Circular 1/98 has been replaced by Technical Advice Note 24.

#### **Policy 17 (The Setting of Listed Buildings):**

- The supporting text should draw attention to the guidance supporting TAN 24 'Setting of Historic Assets in Wales'.

#### **Policy 18 (Protection of Buildings of Local Importance):**

- 'Managing List of Historic Assets of Special Local Interest in Wales'

#### **Policy 19 (Development Affecting Conservation Areas):**

- The circular has been replaced by TAN 24 and supporting guidance 'Managing Conservation Areas in Wales'.

#### **Policy 20 (Historic Parks and Gardens):**

- The register is to become statutory.
- Cadw guidance published to supplement TAN 24 – 'Managing Change to Registered Historic Parks and Gardens in Wales'.

### **Suggested Changes/Comments:**

#### **Chapter 3 Overarching policies**

##### **Policy 1 Appropriate Development in the National Park**

We find this to be a useful policy when assessing development proposals affecting undesignated historic assets. Please retain policy or something like it.

##### **Policy SP3 Environmental Protection – Strategic Policy**

This is also a useful policy for the historic environment. Policy often quoted for comments on proposals affecting archaeology. Keen for policy to be repeated in new plan.

Should the historic environment chapter have a clearer link back to these overarching policies?

##### **Policy 15:**

- Paragraph 3.15.1.2 – this paragraph relates to archaeological heritage of the Park. The 3<sup>rd</sup> sentence refers to local and national importance. It is suggested that it should read '....local,

*national and international importance*'. N.B. the same paragraph number has been used in the next section on listed buildings.

- Paragraph 3.15.1.2 – figure for number of listed buildings needs to be checked. We think that it is higher – probably just under 2000
- The policy regurgitates the Act which local development plan policies are not supposed to do. Possibly need more local emphasis linking back to Policy 1 in the overarching policies.
- The wording of the policy should reflect the Act and accompanying guidance. For example 'significance' is used as the overarching term for the combined special qualities of a listed building.
- 1 (b) – suggestion of possible amendment to replace 'compatible' with 'sympathetic' to ensure that contemporary design of additions is not ruled out.
- JP comment: this needs careful thought as this point is presumably covering aesthetic issues, and also ensuring that newly introduced materials do not harm the fabric of the building. Therefore is 'sympathetic' rather than 'compatible' the right word to cover the second issue?
- 1 (d) is this required as setting is dealt with by Policy 17 and Policy 19?
- The text following the list of criteria needs revising. The sentence on structural surveys does not make sense (possibly the 'or' should be omitted)

**Policy 16:**

- The wording repeats the Act. Question if a policy is needed. There would still need to be some explanatory text to make sure that people are aware that demolition requires LBC.

**Policy 17:**

- The supporting text to should refer to significance rather than character.
- Any revision of the policy or supporting text should not attempt to define the extent of a LB's setting since it can vary so much from case to case.
- Paragraph 3.15.3.1 should be expanded to encourage applicants to undertake their own assessment of setting where relevant. There will be some development projects where applicants will be required to carry out such an assessment. Refer to Cadw's guidance on setting and that applicants use the advice as a basis of their assessment.

**Policy 18:**

- There needs to be consistency – the heading of the section is 'Locally Important Heritage Assets of Local Importance' while the policy is titled 'Protection of Buildings of Local Importance'. Cadw guidance refers to 'historic assets'.
- Clarify whether policy is just intending to cover buildings or wider to cover heritage assets which could also include structures.
- Pembrokeshire Coast NPA have a useful policy (see below)
- There could be policies by type for non-designated assets. Applications for the conversion of barns and chapels frequently arise in the National Park. The policy should link back to Policy SP1 National Park Policy and Policy 1 as provides the more detailed requirements.
- Pembrokeshire Coast NP – locally important buildings policy

N.B they don't seem to have a list of buildings but presumably assess a building if a planning application is submitted and decide if it meets the criteria for this policy to be applied.

**Policy 14      Protection of Buildings of Local Importance**

Development affecting buildings which make an important contribution to the character and interest of the local area will be permitted where the distinctive appearance, architectural integrity or their settings would not be significantly adversely affected.

4.71      The National Park is rich in buildings that are not listed but because of their vernacular architecture and construction are fundamental to the character and interest of the settlement or are important elements in the landscape.

4.72      The following criteria will be used for selection:

- degree to which the building remains in its original condition;
- quality of the individual building's architecture;
- position and influence on the townscape or landscape;
- association with an important local figure or event.

4.73      When considering development proposals, the Authority will give due regard to the difference in status between buildings of local importance and those that are statutorily listed and, hence, the level of protection which they respectively attract.

Although not specifically heritage related, Alice has noted that Pembrokeshire have got a specific landscape policy and asks if the BBNPA benefit from something similar?

*Landscape*

*Policy 15 Conservation of the Pembrokeshire Coast National Park Development will not be permitted where this would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by: a) causing significant visual intrusion; and/or, b) being insensitively and unsympathetically sited within the landscape; and/or c) introducing or intensifying a use which is incompatible with its location; and/or d) failing to harmonise with, or enhance the landform and landscape character of the National Park; and/or e) losing or failing to incorporate important traditional features.*  
<http://www.pembrokeshirecoast.wales/Files/Files/Dev%20Plans/LDPTTextEng/LDP4A.pdf#Hist>

**Policy 19:**

- The existing policy repeats national policies and does not have a local emphasis. Chapter 7 in 'Managing Conservation Areas in Wales' states that policies should be local and area specific. It would therefore be useful to draw out the key issues identified in the Conservation Area Appraisals.
- If there are issues that are very specific to a particular conservation area, a possible solution may be to supplement with a policy for that conservation area (based on the issues identified in the appraisal and the management proposals).
- Make sure wording allows for contemporary design to be introduced providing it is done so in a sympathetic manner.

**Policy 20:**

- Make reference to guidance – N.B. guidance is targeted at owners of parks and gardens rather than as a tool for the planning process.

- Explain in supporting text that Register will become statutory (check when this will be) and that Cadw and the Welsh Gardens Trust are statutory consultees

**Policy 21 (Historic Landscapes):**

- Footnote 20 and 21 should need updating and revising.
- 3.15.7.3 – the paragraph needs review – clarify if the archaeological trusts are doing this work
- 3.15.8 Scheduled Ancient Monuments and Archaeological remains
- Explain that Cadw deal with applications
- Need separate policy for setting SAMs and separate policy for remains
- Paragraph 3.15.8.4 is redundant
- Section needs rephrasing

**Policy 26 (Demolition and Replacement of Dwellings):**

- The policy has relevance to non-designated historic assets and potential loss if replacement dwelling sought. The policy currently allows for replacement if the existing dwelling is of ‘no particular architectural and /or historic and/or visual merit, for which it should be conserved’. The use of ‘particular’ could be open to challenge especially with a vernacular building. Possibly re-word so that the building’s contribution to cultural heritage is part of the assessment of interest.

Policy area: **Ecology** (Policies 3, 4, 5, 6 and 7)

Issues with Implementing:

**Policy 3** – uncertainty over implications of Brexit

**Policies 3 and 4** are covered by national policy and legislation - ? not now necessary (check Swansea and Powys recently adopted LDPs)

**Policy 6** – protection, enhancement and management of existing habitats

**Changes to National Policy since adoption:**

Environment (Wales) Act 2016

Conservation of Habitats and Species Regulations 2017

Well-being of Future Generations Act 2015

PPW – Chapter 5 not changed?

Suggested Changes/Comments:

Add / strengthen policy on biodiversity enhancement

**SP3** – change policy references in b)

**Policy 1** –

iv) The proposed development, where relevant, includes opportunities for the conservation and enhancement of bio/geodiversity through appropriate design and landscaping

**Policies 3 and 4** - see above

**Policy 5** - retain

**Policy 6** – Biodiversity and Ecological Resilience

Section 7 Env't Act and Well-being (Chapter 4 PPW)

Reword this policy to catch retention and management of existing features.

Re-word pre-amble to promote ecological resilience and ref to EWA

**Policy 7** – retain because of local context, low risk bat cases and Section 7 list

Change reference to LBAP

**Policy 8** – retain

**Policy 9** - retain

Definition of a veteran tree

Likely mitigation or compensation requirements

**Policy 10** –

Refer to Mega-catchment / drinking water catchments in the pre-amble

Two “where”s

Cumulative impacts to be addressed in the monitoring report

Pick up on DCWW water quality monitoring and what we need to monitor for impacts of development

**Policy 12 – Artificial Light**

Retain – see SPG

**Policy 13**

Refer to best practice or superseded by – check Snowdonia

Add reference to INNS

Green Infrastructure

**Policy 58**

Add reference to contribution to green infrastructure

