

LDP2

Delivery

Agreement

Planning for the Brecon
Beacons post COVID-19
recovery



Brecon Beacons
NATIONAL PARK

Contents

Forward to the second edition of the Delivery Agreement.....	3
1.0 Introduction.....	4
2. The need for review	4
3.0 The Delivery Agreement.....	5
4.0 Review of Other Plans, Programmes and Policies	5
5.0 Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) of Local Development Plans (LDPs).....	9
6.0 Principles of Project Management Timetabling.....	10
7.0 Principles of Community Involvement for the Local Development Plan.....	10
8.0 Test of Soundness	10
9.0 Local Development Plan Supplementary Planning Guidance.....	11
10 Project Management Timetable	12
11 Staff Resources.....	15
12 Role of NPA Members & the Delegated Powers of Strategy and Policy Officers.....	16
13.0 Financial Resources.....	16
14 Local Development Plan and SA/SEA Integrated Project Management Timetable.....	17
15.0 LDP Risk Management & Mitigation.....	19
16 Community Involvement Scheme (CIS)	20
17 Monitoring and Review.....	33
Glossary of Terms and Abbreviations.....	34
Appendix 1 LDP Risk Management & Mitigation.....	38
Appendix 2: What is Expected of the Consultation Bodies?	40
Appendix 3: Consultation Techniques	42
Appendix 4: Project Management Timetable.....	45

Forward to the second edition of the Delivery Agreement

Review June 2020 – Responding to the Coronavirus Pandemic.

The Delivery Agreement (DA) between the Brecon Beacons National Park (BBNPA) and the Welsh Government was first prepared in June 2018. The timetable was agreed with Welsh Government in September 2018. Since that time work has progressed on the development of the replacement Local Development Plan for the Brecon Beacons National Park area as per our published timetable (henceforth LDP2)

The restrictions in movement brought about by COVID-19 pandemic have had a significant global impact, and unfortunately, the timetable of LDP2 has not been immune to such challenges. As this is written we find ourselves in unprecedented times, where the ability to meet the requirements of our Community Involvement Strategy (CIS) have been prevented by social distancing conventions. It is therefore with regret that we were unable to publish the Deposit LDP in July of this year as set out in our agreed DA. As per the requirements of the Planning and Compulsory Purchase Act (2004) the Authority is seeking to agree an amended Delivery Agreement with the Welsh Government.

Of course, the coronavirus has not just impacted the timeline of LDP2 production. The virus has in many ways transformed the socio-economic conditions into which future policy will play out. It would be remiss of the Authority to roll forward a pre-covid strategy without critically examining its fitness to guide the National Park through a post-covid world. Accordingly, this revised DA includes an additional stage of stakeholder engagement to enable the Authority to collaboratively reassess and rework our Preferred Strategy in light of shifting policy foci. In reviewing our strategy we assert the unique position the National Park occupies in providing a resource for the benefit of the health and well-being of the nation.

1.0 Introduction

Purposes of the National Park

- 1.1 National Parks are internationally recognized protected areas which contain some of our most beautiful spectacular and dramatic areas of countryside. They are landscapes of national and international importance and their designation gives them the highest status for the conservation of landscape and scenic beauty. They contain fantastic opportunities for recreation and millions of visitors across the World who enjoy them every year.
- 1.2 National Parks were designated under the 1949 National Parks and Access to the Countryside Act, but their current framework is the Environment Act 1995. Section 61 of this act sets out the purposes of the National Park as:-
- 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”.
- 1.3 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:
- Take forward the National Park purposes [to] seek to foster the social and economic well-being its local communities within the National Park¹.

2. The need for review

- 2.1 The Authority has a statutory duty to ensure our key strategic policy documents are kept under regular review.
- 2.2 The BBNPA approved Management Plan (2015-2020) is currently being reviewed and a consultation/engagement process is being undertaken in 2020.
- 2.3 BBNPA 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.
- 2.4 In accordance with Local Development Plan regulation 41 a review of the Brecon Beacons National Park first and current Local Development Plan was commenced December 2017. As part of this review process the Authority produced and published

¹ Appendix 3 summarises the Demographics of the National Park area

'The Review Report'². This statutory document provided an overview of the key issues arising from the monitoring of the LDP and supporting evidence to identify the scope of necessary changes to the Local Development Plan. The Review Report concluded that the LDP should be reviewed in full. Preparation of a replacement LDP for the BBNPA area commenced in September 2018.

- 2.5 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 or the adoption of the LDP2 whichever arises sooner.

3.0 The Delivery Agreement

- 3.1 This Delivery Agreement (DA) is a public document of the BBNPA, incorporating its project plan and policy for involving the community in revision of the Local Development Plan and Management Plan.
- 3.2 The DA is an agreement between the Brecon Beacons National Park Authority (BBNPA) and the Welsh Government (WG) and relates specifically to the Local Development Plan. This second iteration of the DA provides detail in relation to the connection between the development of LDP2 and the NPMP review. The agreement between the BBNPA and Welsh Government relates specifically to the development of LDP2, although the significance of the NPMP is acknowledged by the Welsh Government.
- 3.3 The content of this Delivery Agreement specifically addresses the preparation processes of the Brecon Beacons National Park Authority Management Plan (NPMP) and the Local Development Plan (LDP) and the associated Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) and Habitats Regulations Assessment (HRA). This Delivery Agreement commits BBNPA to revise the LDP according to the stated timescales and consultation processes.

4.0 Review of Other Plans, Programmes and Policies

- 4.1 The Park is recognised by the International Union for the Conservation of Nature (IUCN) as a Category V [5] protected landscape which means that it is:

“A protected area where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values.” www.iucn.org

² Endorsed by NPA 20th April 2018 <https://governance.beacons-npa.gov.uk/documents/s28711/Enclosure%20%20-%20Draft%20Review%20Report.pdf>

- 4.2 This definition acknowledges that the National Park landscape is one that is dynamic, shaped by human activity and natural processes over millennia³. Such an understanding of the human influence of landscape is one that seems most pertinent at the time of strategic policy development - at a time when we are facing the twin challenges of biodiversity⁴ and climate crisis⁵. We acknowledge that our landscapes continue to change in response to societal choices related to land use and land management. The Environment Act (1995) places a duty on the National Park Authority to manage these processes of change through the development of the National Park Management Plan. It is the duty of the NPMP to define a twenty year vision for the future of the National Park and to work with partners to implement and monitor delivery of this vision.
- 4.3 This document is the single most important document for the National Park, it is the framework through which our statutory purposes and duty are implemented. The LDP is the land use planning expression of the NPMP.
- 4.4 Development of the NPMP is directed by guidance produced in 2007 by CCW which, despite its age, remains relevant and is clear in the interconnectedness of the NPMP and LDP.
- 4.5 The LDP is the mechanism by which the land use elements of the NPMP vision are implemented and monitored. However in defining our LDP the Authority is required by the Planning and Compulsory Purchase Act (2004) to have regard to current national planning policy and guidance in the development of the LDP. A definitive list of relevant policies plans and programmes has been produced as part of the Scoping Report of the joint SA/SEA for the NPMP and LDP. However, the principal documents are as follows:
- Planning Policy Wales PPW (10th Ed)(December 2018);
 - Technical Advice Notes (Wales) (TANs);
 - Local Development Plan Manual (3rd Ed) (2019).
 - National Park Management Plans Guidance (Natural Resources Wales 2007).
 - Ecosystem Approach for Protected Landscapes Management Plan Reviews (Natural Resources Wales 2014).
- 4.6 In addition to these planning policy and guidance documents, the NPA must also have regard to:
- The Environment Act (1995)

³ BBNPA (2012) *Landscape Character Assessment* Prepared By Fiona Fyfe Associates With Countryside, Alison Farmer Associates and Julie Martin Associates

⁴ IPBES (2019): *Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services*. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany

⁵ IPCC, (2018): Summary for Policymakers. In: *Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [Masson-Delmotte, V., P. Zhai, H.-O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J.B.R. Matthews, Y. Chen, X. Zhou, M.I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, and T. Waterfield (eds.)].

- 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)
 - The Environment Act (Wales)(2016)
 - The Historic Environment (Wales) Bill 2016
- 4.7 The position the Authority occupies as custodians of a National resource places a substantial obligation on future policy making to ensure the qualities for which we are designated are conserved and enhanced. As such there is significant opportunity for policy making within the National Park to be unique, bold and above all relevant to our particular character and circumstances.
- 4.8 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, and in accordance with S62(2) of the 1995 Environment Act, it remains imperative that our constituent Unitary Authorities have regard to National Park purposes and duty and NPMP in the drafting in their strategic plans and policies:-
- Public Service Board Well-being Plans
 - 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
- 4.9 The following BBNPA strategies will also provide an important influence on the production of the LDP (this list is not exhaustive):
- Landscape Character Assessment
 - BBNPA Corporate Plan;
 - Rights of Way Improvement Plan
 - Historic Environment Action Plan
 - Local Biodiversity Action Plan;
 - Nature Recovery Action Plan;
 - Sustainable Tourism Strategy;
 - Sustainable Development Strategy,
 - Visitor Management Plan
 - Area based visitor management strategies
 - Interpretation Strategy
 - NPA Position Statements
 - River Wye Nutrient Management Plan
 - Social Inclusion Strategy; and,
 - BBNPA State of the Park Report (SoPR) 2014 and 2020.

Well-Being of Future Generations Act 2015

- 4.10 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 areas 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

BBNPA Well-being objective

The National Park, a resource for the People of Wales and beyond, is recognised as an important place in the fight for the recovery of nature and the enhanced wellbeing of people. To that end:

- People will benefit from the Park's resilient landscape, full of flourishing wildlife and valued heritage.
- People will be able to access, understand what makes the Park special
- People living and working in the Park will benefit from strong communities, sustainable livelihoods, healthy lifestyles and widespread decarbonization.

- 4.11 The Act also defines five ways of working which are:- long term; integration; involvement; collaboration and prevention.
- 4.12 The NPMP and 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 two plans.

Evidence Base Assessments

- 4.13 The 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

- 4.14 With regard to the Management Plan, the health of the Park is affected by many factors that fall outside the scope of the Management Plan, but the State of the Park Report will be used to measure the health of the Park and will be developed over time to ensure it continues to be an invaluable monitoring resource to be the primary evidence base for the NPMP review.

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

- 5.1 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.
- 5.2 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.
- 5.3 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.

6.0 Principles of Project Management Timetabling

- 6.1 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.

7.0 Principles of Community Involvement for the Local Development Plan

- 7.1 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.
- 7.2 The key principles that underpin community engagement in the LDP process⁶ 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.

8.0 Test of Soundness⁷

- 8.1 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.

⁶ These principles were included in the Statement on Planning Delivering for Wales by the Minister for Environment, Planning and the Countryside in November 2004

⁷ PINS (2006) Guide to the Examination of LDPs

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.

8.2 The Inspector's findings will be binding on the Authority

8.3 Failure to produce a sound plan may result in the Authority having to repeat stages of the LDP preparation process.

8.4 The NPMP does not undergo any independent examination and the tests of soundness are not applied in its assessment.

9.0 Local Development Plan Supplementary Planning Guidance⁸

9.1 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 for defining how certain policies may be developed and implemented.

9.2 Since adoption of the LDP in 2013 the NPA has endorsed a range of Supplementary Planning Guidance (SPG) as follows:-

- Allotments
- Affordable Housing Strategy (September 2019)
- Householder Design Guide
- Biodiversity and Development (September 2016)
- Planning Obligation Strategy (July 2014)
- Affordable Housing (September 2019)
- 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) (Revised June 2019)
- 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)

⁸ For BBNPA consultation processes on Supplementary Planning Guidance refer to page 27/ 28

- Cwrt y Gollen Development Brief (July 2014)
- Former Mid Wales Hospital, Talgarth Development Brief (April 2019)

9.3 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 and updated evidence base.

Post-Covid Revisions

9.4 The Ministerial letter to all Chief Planning Officers of the 7th July 2020 stated

Local planning authorities must reflect on the impact of the pandemic on their areas and consider the consequences for LDPs under review or being implemented...LDPs are evidence-based documents. As a result of the pandemic and resulting downturn in the economy much of the evidence on which LDPs are based is likely to be out of date...LDPs currently undergoing review, which have not yet been submitted to the Planning Inspectorate for examination, should undertake an assessment of the evidence base, strategy and policies in terms of sensitivity to the consequences of the Pandemic. Robust conclusions should be reached on the need for new evidence and any consequential changes to strategy and policy before progressing plan preparation. The assessment should be submitted to the Welsh Government with requests to extend Delivery Agreements (DA)⁹

9.5 The Authority has duly undertaken this assessment (see summary at Appendix 5) and determined that there has been sufficient contextual changes to facilitate revision of our Preferred Strategy and Scoping Report/Methodology for the Integrated Sustainability Appraisal.

9.6 This Delivery Agreement therefore sets out a revised timetable accommodating an additional consultation phase on a revised Preferred Strategy.

10 Project Management Timetable

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

10.1 Balancing speed and efficiency, the timetable for the production of the NPMP and LDP is summarised at table I below.

10.2 The timetable has been developed to align with the LDP Regulations under Part 6 of the Planning and Compulsory Purchase Act 2004. The timetable consists of two broad stages as follows:-

- **Definitive Stages** including all stages up to and including the statutory deposit period, and;

⁹ Ministerial letter MA-KK-2099-20 https://gov.wales/sites/default/files/publications/2020-07/planning-and-the-post-covid-19-recovery-letter-to-local-authorities_0.pdf

- **Indicative Stages** all work carried out after the Deposit period up to the adoption date.

10.3 The definitive stages of the project management timetable provide detailed, transparent and realistic timetabling that will be monitored in the assessment of the plan’s soundness. As per regulation, significant deviations will need to be approved by WG and accounted for by the NPA. Indicative stages of plan preparation are flexible and dependent on unforeseen factors. It is the intention that the dates of the indicative stages will be defined within 3 months of the close of the formal 8-week deposit period.¹⁰

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 Management Plan – Commence review of State of the Park Report (SoPR); Data Gathering for SA/SEA Scoping Report	
Pre-Deposit Participation	October 2018	June 2019
	NPA resolution to consult on Preferred Strategy May 2019 Management Plan – Review evidence base and develop State of the Park Report	
Preferred Strategy (Pre-Deposit Consultation)	June 2019	August 2019
	8 Week consultation Report to NPA consultation responses and resulting actions Management Plan – develop State of the Park Report	

¹⁰ WAG, 2005, Local Development Plans Wales 2005

Revised Delivery Agreement in response to Covid-19	September 2020	
Pre-Deposit review	August 2019	December 2020
	NPA resolution to consult on Revised Preferred Strategy LDP 30 th October 2020 Management Plan: Consultation on Draft Management Plan	
Preferred Strategy (Pre-Deposit Consultation) Draft NPMP	January 2021	February 2021
	8 Week Consultation	
Deposit Preparation	January 2021	June 2021
	8 Week Consultation LDP: Report to NPA Focused Changes and resolution to submit plan February 2021	
Deposit Consultation	July 2021	August 2021
	8 Week Consultation	
Post Deposit	August 2021	October 2021
	Review consultation responses Prepare where necessary Focused Changes	

Indicative	
Submission of LDP to Welsh Government	November 2022
Hearing Sessions Examination	January/February 2022
Inspectors Report	November 2022
Adoption	December 2022

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

SA/SEA and HRA tasks

- 10.4 SA/SEA and HRA will be undertaken as iterative processes throughout plan preparation as indicated in table 7

I Staff Resources

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

Officer Job Title	Number of posts	Proportion of time spent on MPNP production	Proportion of time spent on LDP Production
Planning and Heritage Manager	1	5%	30%
Principal Planning Policy Officer	1	35%	40%
Evidence and Performance Officer	1	45%	35%
Sustainable Development Officer	1	30%	5%
Senior Planning Policy Officer	1	45%	45%
Planning Policy Officer	1	45%	45%

Planning Technician	I	30%
---------------------	---	-----

11.2 The figures above are indicative only due to the cross departmental 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 interdepartmental working relationships. This partnership is referred to as the Policy Officers Group (POG) and are responsible for the production of a joint evidence base and ISA.

11.3 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;

12 Role of NPA Members & the Delegated Powers of Strategy and Policy Officers¹¹

12.1 The 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, w Officers will not make decisions on behalf of the NPA unless specifically given delegated powers to do so. The NPA Members as elected councilors and Welsh Government Appointees are responsible for making the final decisions at key stages throughout the process.

12.2 Throughout the whole NPMP and LDP process ongoing public consultation will be integral to the Plan’s effective development. In order to accommodate the volume of work involved, a Policy Working Group (via the Policy Forum) has been established. Selective NPA members will be invited to sit on the working group.. Recommendations from the working group will be considered by all members of NPA at Policy Forum and National Park Authority Meetings.

13.0 Financial Resources

Financial Resources: Funding Plan Preparation¹²

Stage in Plan Preparation	Budget
---------------------------	--------

¹¹ Appendix 1 highlights the dates for the SA/SEA Steering Groups and National Park Authority Committees

¹² Please note these only include partial staff costs where these have been recruited for the express purpose of LDP2 development

Delivery Agreement	£10k
Pre Deposit Participation	£100k
Pre Deposit Public Consultation	
Revised Deposit Plan	£200k
Advertisement of Focused Changes	£100k
Submission of LDP to WAG	£250k
Independent Examination	
Inspector's Report	
Adoption	£40k
Annual monitoring Reports	

14 Local Development Plan and SA/SEA Integrated Project Management Timetable

Stage	Date	Local Development Plan	NPMP & LDP S.A./S.E.A.	NPMP & LDP HRA
5	June-December 2020	<ul style="list-style-type: none"> ▪ Review of evidence base post covid ▪ Review and redraft of Strategy ▪ Revise DA 	<ul style="list-style-type: none"> ▪ SA/ Env'tal Report Preparation (including new options, alternatives & Representations) 	<ul style="list-style-type: none"> ▪ Significance test-policies/options/ Alternatives/ etc ▪ HRA Report Preparation (inc new options & Representations)
6	January - February 2021	LDP Statutory Preferred Strategy Consultation (8 weeks) (Including Initial Consultation Report)	Consult on SA/ Environmental Report (6 weeks in conjunction with LDP)	Consultation on HRA Report contained in SA Report
7	March – May 2021	Review of Consultation Comments Review of policies and sites for Deposit LDP2		

Stage	Date	Local Development Plan	NPMP & LDP S.A./S.E.A.	NPMP & LDP HRA
		Seek NPA approval to consult on Deposit LDP2		
8	July-August 2021	LDP Statutory Deposit Period (8 weeks) (Including Initial Consultation Report)	Consult on SA/ Environmental Report (6 weeks in conjunction with LDP)	Consultation on HRA Report contained in SA Report
9	August – October 2021	Consider Deposit Representations (Use of Dev. Plan working Group) <ul style="list-style-type: none"> ▪ Develop focused changes in consultation with Dev. Plan Working Group ▪ Seek NPA approval to submit 	Consider Representations to SA/ Env Report <ul style="list-style-type: none"> ▪ Assessment of the significant changes made following consultation ▪ Decision on Requirement for Changes to Plan 	Consider Representations to HRA Report <ul style="list-style-type: none"> ▪ Significance test of changes ▪ Assessment of the significant changes made as a result of consultation ▪ Decision on Requirement for Changes to Plan

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

Stage	Date	Local Development Plan (LDP)	NPMP & LDP S.A./S.E.A. and A.A.	NPMP & LDP HRA
10	November 2022	Submission of LDP to WG: (inc SA/SEA Report, HRA Report, evidence base, CIS if amended, consultation report, Focused changes) <ul style="list-style-type: none"> ▪ Pre-Examination meeting with Inspectorate 6 		-

		<p>weeks from submission</p> <ul style="list-style-type: none"> ▪ Consultation on Focused Changes 		
11	<i>January 2022</i>	<p>Independent Examination in Public:</p> <ul style="list-style-type: none"> ▪ 12 weeks maximum for Examination & 22 weeks until Inspector's Report 	-	-
12	<i>November 2022</i>	<p>Inspector's Report: 'Binding' (12 months from submission)</p>	<ul style="list-style-type: none"> ▪ Amend Report following Inspector's Binding Report ▪ Statement of how SA/ SEA influenced the LDP (on Adoption) 	<ul style="list-style-type: none"> ▪ Amend HRA Report following Inspector's Report ▪ Statement of how HRA influenced LDP
13	<i>November 2022</i>	<p>Publication of the Planning Inspector's Recommendations</p>		
13	<i>December 2022</i>	<p>Adoption of the Plan</p>		

15.0 LDP Risk Management & Mitigation

- 15.1 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.
- 15.2 The principle risks that the NPA still need to consider in risk management are as follows:
- The publication of revised legislation/ guidance;
 - The ability of consultees to engage/ Inspectorate to respond within a set timetable given resource constraints;
 - Legal challenge;
 - Political Change/ elections;
 - Presence of a Habitats Directive Site affecting the 'Preferred Strategy'.
 - Re-entering 'Lock-down'
- 15.3 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.

- 15.4 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.

16 Community Involvement Scheme (CIS)

Introduction to the Community Involvement Scheme

- 16.1 A key objective of the National Park Management Plan and Local Development Plan system is to build greater consensus and strengthen community involvement in plan's 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 NPMP and LDP 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.
- 16.2 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.
- 16.3 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.
- 16.4 The Authority recognises the significant impact that COVID-19 has had on public life, and the ability for people to access information from public offices. Our own Offices have been shut since March 2020 and are only opening in a limited capacity at present. As such we aim to increase flexibility as much as is possible in relation to enabling our communities

and stakeholders to access information. The following section has been revised to accommodate consultation even in circumstances of 'lockdown'.

Purposes and Benefits of Community Involvement

- 16.4 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.
- 16.5 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.
- 16.6 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.
- 16.7 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?

- 16.8 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.
- 16.9 The following are the key groups to be involved (these are also referred to as 'consultees'):
- 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.

16.10 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 National Park Management Plan and 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.

16.11 The National Park Authority have a Policy Consultation Database which holds the mailing/email lists for all consultation processes throughout the NPMP and LDP 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 strategy@beacons-npa.gov.uk.

16.12 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

16.13 Officers within the Authority are required to:

- Ensure the National Park Management Plan and Local Development Plan revision processes are 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.

16.14 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.

16.15 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.

16.16 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 Plans by the appointed Planning Inspector, who will examine the soundness of the Replacement Plans.

Equality

16.17 Underpinning the Authority's ideas on community involvement is the issue of equality. Brecon Beacons National Park Authority will comply with the Equality Act 2010 (Wales) - Public Sector Equality Duty (PSED). The duty covers age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. In summary, those subject to the general equality duty must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

16.18 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.

16.19 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/USB Memory sticks and hard copies will be available at request to any consultee that request. The Authority will not be undertaking any face to face consultation events. We will be offering 'virtual' meetings for those that are able to access such technology, and telephone consultations can be booked with Officers for question and answer sessions.

Community Involvement Methodology

16.20 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 I below). For example the various groups listed below will be used by the National Park Authority at different stages of plan preparation. The aspiration is for such meetings to be face to face, however, where circumstances prevent such action we will utilise virtual means to facilitate such meetings:

- Steering Groups;
- Working Groups;
- Member's Workshops;
- Stakeholder Group Meetings;
- Key Stakeholder Working Groups; and
- Community Training events and workshops
- Citizen Assemblies

16.21 The function and reasons for the use of these groups is explained at Appendix 3, Consultation Techniques. The community involvement techniques above were open to feedback¹³ 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.

16.22 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.

16.23 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.

¹³ In accordance with the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

- 16.24 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

- 16.26 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.
- 16.27 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 their place plan preparation stages, undertaking local resident's surveys to gather the opinions of those living and working within their communities and draft plans out for public consultation.
- 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.

Figure I: Critical Stages in Community Involvement

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

Community Involvement Stage	Date/ Approx. Time Period
Actions below undertaken at Definitive Stage of Timetable	
<p>NPMP Key Issue and Revised Strategy targeted consultation</p> <p><i>Utilising key stakeholder analysis use targeted engagement to collaborate on key issues identified through NPMP Delphi process and subsequent revisions to LDP Preferred Strategy.</i></p> <p><i>Due to restrictions in movement all communication will be undertaken utilising virtual means.</i></p>	June- December 2020
<p>Consultation on Draft Management Plan & Preferred Strategy LDP (8 Weeks)</p> <p><i>(Including Easy-read Preferred Strategy Change document NPMP, SA/ SEA Report & Initial Consultation Report)</i></p>	January – February 2021
<p>Consultation on Deposit LDP (8 weeks)</p> <p><i>(Including Easy-read Deposit, SA/ SEA Report & Consultation Report)</i></p>	July- August 2021
Actions below undertaken at Indicative Stage of Timetable	
Advertisement of Focused Changes (8 Weeks)	November-December 2021
<p>Submission of the LDP to WG & Independent Examination</p> <p><i>(Including SA/ SEA Report)</i></p>	Commencement of Independent examination November 2021
Publication of Inspector’s Recommendations	November 2022
Monitoring, review and related Supplementary Planning Guidance	<i>(on going)</i>

The most readily available feedback mechanism will be via the BBNPA website (www.beacons-mpa.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

Delivery Agreement [Regulation 9]	
Why	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.
When	June – September 2018
Who	<ul style="list-style-type: none"> ▪ Authority members; steering group members, Welsh Government and key stakeholders; ▪ All other consultee groups; ▪ The planning inspectorate; and ▪ The general public.
How	<ul style="list-style-type: none"> ▪ General Consultation Bodies and Town and Community Councils will be specifically engaged regarding community involvement. This will be undertaken via questionnaires, and consultations. ▪ Draft Delivery Agreement will be sent to statutory consultees and stakeholders for comments. A feedback form will be attached. ▪ 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. ▪ The general public will be advised of this by press notices and advertising

Pre-Deposit Stakeholder Participation [Regulation 14]	
Why	<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>
When	January 2019

Who	<ul style="list-style-type: none"> ▪ NPA Members; ▪ Key Stakeholders, Partners and Interest Groups;
How	<ul style="list-style-type: none"> ▪ Member’s Workshop: Structured workshop with Committee Members to discuss BBNPA ‘Issues Papers’ and strategic options. ▪ Stakeholder Meetings: Structured meetings with internal and external stakeholders, (possibly led by an external facilitator) - again discussing strategic options identified in BBNPA ‘Issues Papers’. ▪ NPMP/LDP Steering Group: To discuss scope of the SA/SEA and HRA (includes environmental consultation bodies)

Consultation on Draft SA/SEA and HRA Scoping Report	
Why	To ensure that the scope and methodology of the SA/SEA and HRA of the Plan is appropriate.
When	Between November – December 2019 [for a statutory 5 Weeks]
Who	<ul style="list-style-type: none"> ▪ Authority Members; Steering Group members, and Key Stakeholders; ▪ All other consultee groups (inc environmental consultation bodies); ▪ The general public.
How	<ul style="list-style-type: none"> ▪ Scope will be decided using NPMP/ LDP Steering Group at Pre-Deposit Stakeholder Participation Stage ▪ Draft Scoping Report will be sent to statutory consultees and stakeholders for comments. A feedback form will be attached. ▪ 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. ▪ The general public will be advised of this by press notices and advertising

Pre-Deposit Public Engagement [Regulation 15 & 16]	
Why	<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> <p>Also to consult on Initial SA/SEA Report following the development and refining of alternatives.</p>
When	July – August 2019 (Including Statutory 6 weeks consultation on Preferred Strategy)
Who	<ul style="list-style-type: none"> ▪ Local Communities;

	<ul style="list-style-type: none"> ▪ Key Stakeholders, Local Resident Groups, Localised Interest Groups and other relevant local consultee organisations; ▪ Environmental Consultation Bodies and; ▪ Community Councils and the General Public.
How	<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"> ▪ Engagement of community councils / wider communities ▪ BBNPA HQ Exhibition ▪ Various Presentations as and when required ▪ Key Stakeholders- working groups ▪ NPMP/ LDP Steering Groups ▪ Also use of: Website; appointments; comments sheets; reception exhibition; advertise (newspapers, news, radio, poster, newsletter, community magazines); LDP Surgery; questionnaires. <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"> ▪ Sent to stakeholders for comments. A feedback form will be attached; ▪ Also publicly available at National Park Authority headquarters; Public Libraries, Tourist Information Centres and website

NPMP Issues Key Stakeholder Engagement [Regulation 9]

Why	The NPA staff will also be asked to identify the key issues facing the National Park which will be used to inform and prepare an NPMP Issues Report.
When	June- December 2020
Who	<ul style="list-style-type: none"> ▪ Focussed Consultation with identified Key Stakeholders utilising virtual communication methods ▪ NPA Members and Staff
How	NPA and Statement on BBNPA's website

LDP Preferred Strategy Revision in light of Covid-19 Pre-Deposit Public Engagement [Regulation 15 & 16]

Why	<p>To gather evidence and provide a revised strategy that takes account of Covid-19 related impacts</p> <p>Opportunity for local communities to provide an input into the Plan. This process will contribute to a public understanding of the reviewed options that have emerged from the reassessment of the COVID . 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> <p>Also to consult on Initial SA/SEA Report following the development and refining of alternatives</p>
When	January – February 2021 (8 weeks)
Who	All stakeholders
How	<ul style="list-style-type: none"> • NPA Member Policy Working Group • NPA Member Policy Forum meeting • Electronic dissemination of evidence papers and proposed changes • Virtual meetings with key stakeholders to discuss evidence and revisions • Bookable Q&A telephone interviews • Hard copy mailouts on request • Virtual consultation events. • Citizen Assemblies on key topics (climate change – sustainable rural economies – town centres – farm diversification – levels of growth)

Local Development Plan [Regulation 17], SA Report/ SEA Environmental Report, & Initial Consultation Report	
Why	<p>To provide the opportunity to support or voice concerns over:</p> <ul style="list-style-type: none"> ▪ The Deposit Local Development Plan; ▪ The SA Report/ SEA Environmental Report and Appropriate Assessment; and ▪ The Initial Consultation Report.
When	July - August 2021 (8 weeks)
Who	All consultees and general public (including environmental consultees)
How	<ul style="list-style-type: none"> • NPA Member Policy Working Group • NPA Member Policy Forum meeting • Electronic dissemination of evidence papers and proposed changes • Virtual meetings with key stakeholders to discuss evidence and revisions • Bookable Q&A telephone interviews

	<ul style="list-style-type: none"> • Hard copy mailouts on request • Virtual consultation events.
--	---

Stages Below are at indicative stages of Project Management Timetable

Focused Changes Consultation [Regulation 20 and 21]	
Why	To advertise proposed changes arising from Deposit consultation
When	November - December 2021
Who	<ul style="list-style-type: none"> ▪ Authority Members; Steering Group members, and Key Stakeholders; ▪ All other consultee groups; ▪ The general public.
How	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.

Submission of the LDP and Independent Examination [Regulation 22 and 23]	
Why	To determine whether any improvements can be made to the Plan's policies and proposals. To provide an impartial examination of the LDP.
When	November 2021
Who	<ul style="list-style-type: none"> ▪ Authority Members; Steering Group members, and Key Stakeholders; ▪ All other consultee groups including environmental bodies; ▪ The general public.
How	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 on request. Formal notification will also be provided by letter to those who made (and not withdrawn) a representation.

Publication of Inspector's Recommendations and Adoption	
Why	To make the Planning Inspector's recommendations (and reasons) generally available for inspection and to inform of adoption.

When	
Who	<ul style="list-style-type: none"> ▪ Authority Members; Steering Group members, and Key Stakeholders; ▪ All other consultee groups; ▪ The general public.
How	<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>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 on request. Formal notification will also be provided by letter to those who made (and not withdrawn) a representation</p>

CIS Stage 9: Monitoring Review and Related SPG [Regulation 37]	
Why	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.
When	<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>
Who	<ul style="list-style-type: none"> ▪ Authority Members; Steering Group members, and Key Stakeholders; ▪ All other consultee groups; ▪ The general public.
How	<p>An Annual Monitoring Report will be made publicly available on the National Park Authority's website. Hard copies will be made available on request. 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>

17 Monitoring and Review

Delivery Agreement

- 17.1 BBNPA will monitor and review the effectiveness of the approved Delivery Agreement at each stage of the Plan's 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
- 17.2 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
- 17.3 Further consultation will be undertaken during the monitoring and review of the DA before Authority and WG agreement.
- 17.4 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

- 17.5 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.
- 17.6 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.

- 17.7 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.
- 17.8 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

- **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 Assembly:** A dialogue method whereby a randomly selected, representational number of residents agree hear evidence from experts on particular topics and vote on recommendations for policy development.
- **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. The Authority extends all consultation periods to 8 weeks.

- **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 5: Review of LDP2 evidence base against impacts of COVID 19

Appendix I LDP Risk Management & Mitigation

Risk	Potential Impact	Mitigation
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

Risk	Potential Impact	Mitigation
		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
Global Pandemic causing restrictions to public spaces which will impact the CIS and evidential soundness of LDP	Additional work/time required. Timetable slippage.	Revising Delivery Agreement
Digital systems failure causing restriction to public access of digital systems	Loss of work as a result of corrupted servers Impact on digital communication channels	Cloud based storage for all critical documents Separate webhosting platform as backup should

Risk	Potential Impact	Mitigation
	Additional work/time required. Timetable slippage	
Ecological status of river bodies within the National Park falls below acceptable level.	Risk of moratorium on new development as per Hereford experience. Significant costs associated with remediation works to address improvements in ecological status and enable new development.	Close working with all statutory bodies to ensure clear monitoring of all impacts onto rivers systems. HRA of all policy with a likely effect on water quality of river system. Include the potential for future risks as a guiding principle in the allocation of future development sites.

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

Consultation Technique	Explanation
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. Ie NRW, Cadw, Unitary Authorities, Community Councils. However further relevant bodies may be invited when and where appropriate.
Telephone Q&A	Bookable appointments where members of the public or stakeholders have the opportunity to ask questions of officers of the Authority.
Citizen Assembly	Invitations will be sent to representative sample of community members to attend a meeting where experts provide evidence on a topic. Recommendations are then formed and provided by the group
Virtual meeting	Meeting using a computer with access to the internet to undertake 'video conferencing'. The Authority uses a range of systems,

	including public I, Microsoft Teams and Lifesize
--	--

Appendix 4: Project Management Timetable

BBNPA Action	2020												2021												2022												2023											
	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
LDP																																																
Delivery Agreement Revision																																																
Delivery Agreement Confirmation WG																																																
REVISED PREFERRED STRATEGY																																																
Ongoing baseline evidence gathering																																																
Publication of Revised topic papers																																																
Draft written report of Preferred Strategy																																																
Candidate Site Assessment																																																
Consultation on Preferred Strategy																																																
DEPOSIT																																																
Virtual Citizen Assemblies																																																
Consider Reps Preferred Strategy																																																
Settlement Assessment																																																
Finalize Topic Papers																																																
Draft Deposit Plan																																																
Consultation Deposit Plan																																																
SUBMISSION																																																
Drafting Focused Changes																																																
Update all Submission documents																																																
Submission																																																
Consultation on Focused Changes																																																
EXAMINATION																																																
Pre-Hearing Meeting																																																
Hearing Sessions																																																
MAC Consultations																																																
Reporting																																																
Inspectors Report																																																
Adoption Report																																																
ADOPTION																																																
Monitoring																																																

Appendix 5: Review of LDP2 evidence base against impacts of COVID 19

In March of this year Officers began to gather emerging evidence, analysis and theory in relation to the potential impacts of coronavirus on future Policy Making. This work culminated in the presentation of a series of reports to Members Policy Forum with recommendations in relation to post-covid policy development. Crucially this review work highlighted the significance of the National Park as a National resource for health and well-being and the future implications on housing and employment policy. The papers are available to read in full here:

[Research paper No1 – COVID 19 and Economic Impacts](#)

[Research paper No2 – COVID 19 and Environmental Impacts](#)

[Research paper No1 – COVID 19 and Social Impacts](#)

The following tables provides a summary of the findings of these paper by policy sector where such sectors are considered to be impacted by COVID-19. It also includes any other contextual changes which have shifted the policy frame since the publication of Preferred Strategy 2019 (PS19).

Policy topic area	Scale and Location of Growth
Contextual changes since PS19	The supply of Brownfield land to service the strategy has reduced significantly with the reassessment of Powys CC future direction programme. 2018 population figures showing less decline from Powys area of the Park
COVID-19 Impacts	.PS19 had aimed to increase housing provision above demographic need in order to attract working age population to support jobs numbers within the National Park. Changes in working practice brought about by lockdown have 'untethered' houses from jobs for those in higher paid jobs - with many of the salariat able to access their work from their homes. The shifting pattern of working appears to be a trend that analysts are predicting will endure ¹⁴ . Coupled with emerging data from 2018 population projections, the area is not predicted to experience such significant depopulation from principle centres of occupation. The policy led strategy to increase in-migration to support jobs is challenged by the emerging trends to the extent to which further review is necessary
Significance	PS19 concentrated new growth within principle settlements. This is considered to still be appropriate for a post-covid recovery. These settlements have the best connection to digital infrastructure and services within walking distance and are still considered sound locations for future growth. The scale of future growth will need to be fully reassessed and reconsulted upon in order to ensure LDP2 is based on the most up-to-date information to form sound policy.

Policy topic area	Housing
Contextual changes since PS19	2018 population figures published for unitary authorities (publication date TBC for National Park areas) Emerging figures for LHMA/RHMA

¹⁴ ONS Data suggests that 36% of workforce are working remotely as of September 10th 2020

<https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/bulletins/coronavirusandtheeconomicimpactsontheuk/10september2020>

COVID-19 Impacts	<p>Traditionally the housing market in the National Park is heavily influenced by the in-migration of retirees who, from work place attachments, are willing and able to pay a premium to move to a high quality environment such as the National Park. This freedom from work place affiliations (as set out above) now applies to a much greater proportion of general working age population. Questions arise around the extent to which the shifting working practice will then facilitate their entrance into the housing market of the National Park. The trauma of lockdown has generated an increased appreciation for the benefits of the natural environment. Access to the open countryside for recreational activity is seen by individuals as a benefit to health and wellbeing. If this interest is sustained and if it is coupled with an ability to undertake the majority of work from home the National Park may experience.</p> <p>At the same time emerging data within the LHMA is highlighting the significant need for smaller adapted properties to meet the needs of our aging demographic. Should LDP2 enable development restricted to meeting these needs this could trigger a subsequent release of larger properties onto the housing market. This in turn could to meet the market need for in-migration of working age cohorts who are able to undertake the majority of their work from home. The numbers associated with this level of in-migration requires further analysis.</p>
Significance	<p>Emerging evidence would suggest that there is limited need for new market housing within the National Park, whereas there is significant need for smaller housing built to lifetime homes standards. Changes in working behaviour engendered during lockdown, have the potential to increase market demand in more rural locations. These issues were not addressed in PS19, and they are significant for future housing supply in a post-covid world. Housing need will need to be fully reassessed and reconsulted upon in order to ensure LDP2 is based on the most up-to-date information to form sound policy.</p>

Policy topic area	Employment
Contextual changes since PS19	Growing Mid Wales Employment Sites and Premises Study findings in relation to potential need for additional employment land in Brecon.
COVID-19 Impacts	<p>Long-run predictions for the UK economy predict a contraction of up to 1.5%. The effects of lockdown resulted in short-run contraction of UK GDP by as much as 20%. At time of writing some recovery is seen however economic outputs are predicted to be depressed for the beginning of the LDP2 period. Latest statistical release (September 2020) from the ONS demonstrates the difficulties businesses in Wales with around 50% reporting a decrease in turnover since this time last year. This is likely to be exacerbated in the National Park due to the make up of our economy, which is dominated by retail, tourism and the public sector. In relation to our traditional B class economy, this was already static if not declining prior to COVID-19 however not to a degree that land release was considered necessary. The restrictions imposed by lockdown have had significant impact. With the manufacturing sector demonstrating around a 50% decrease in turn over year on year.¹⁵ Although it is considered too early to fully determine the impacts of COVID on B class employment land, there are two lines of thought which LDP2 should address – enabling development for B class land aimed at a ‘green’ recovery which is seen as transitioning those who have lost their jobs in traditional industry (see</p>

	Economic Impacts research report for more info and the analysis of Hepburn et al (2020) and having more flexible policies around the development of employment generating development within B class employment sites where there is no demand for traditional B class development.
Significance	No significant shift in policy development, refocus to employment strategy and additional exception policy to be developed.

Policy topic area	Retail
Contextual changes since PS19	Failure to establish Business Improvement District within Brecon
COVID-19 Impacts	Lockdown has had one of the biggest impacts on bricks and mortar retail, overnight preventing businesses from trading as per standard practice. ONS release for September identifies that of the retail businesses surveyed 5.7% stated that they would be stopping trading within the next three months. This is the highest percentage of asserted closure against the major sectors of the economy. This may be linked to the continued reluctance of consumers to go back to the Highstreet. The same release highlights that footfall on British Highstreets was operating at 75% of levels seen during the same period in 2019 ¹⁶ . Analysis of the data shows this as a 'flattening off' of the steady growth in numbers that had been seen since shops were allowed to re-open. All our town centres were operating at a rate of vacancy above target thresholds. We had witnessed a steady growth in vacancy rates since the adoption of the LDP in 2012. Current need to reassess the impact of coronavirus on our retail centres and address policy for regeneration. Retail need evidence emerging suggests that there is little or no need for new retail space, again this will have to be revisited as part of developing the LDP further.
Significance	Potential for shift in policy development, refocus retail strategy to ensure our town centres remain vibrant locations serving the needs of our communities and our visitors.

Policy topic area	Tourism
Contextual changes since PS19	-
COVID-19 Impacts	The significance of the tourism economy to the National Park cannot be overemphasised. Again, the latest ONS stats give some indication of the impact of lockdown on this sector - the accommodation and food service activities industry reported the highest percentage of businesses reporting their risk of insolvency was severe to moderate, at 23%, compared with 11% across all industries. Although the lifting of lockdown restrictions brought a flood of tourists back into the National Park, it is clear that the impacts of the virus and lockdown has had a significant impact. The fourth wave Wales Tourism Barometer reported that 40% of businesses surveyed were reporting income reduction year on year with 2019. The researchers posit that this may be due to limited capacity to operate at full capacity and not a true reflection on actual demand for some attractions/accommodation. The National Park has a significant self-catering offer, across wales Self catering is one of the tourism sectors most able to reopen following lockdown, with 80% reporting that they were operating at 100% of pre-covid capacity. International tourism has fallen significantly

	This could create circumstances where we see a small rise in applications to remove holiday let ties from permitted schemes. Further analysis will be needed in relation to the appropriateness of a permissive policy for such applications.
Significance	Potential for shift in policy development requiring further research.

Policy topic area	Agriculture and Farm Diversification
Contextual changes since PSI9	Conclusion of Sustainable Farming Consultation Growing likelihood of no-deal Brexit.
COVID-19 Impacts	The president of the NFU gave evidence to the Environment Food and Rural Affairs Committee on the 5 th May 2020 highlighting the significant impact coronavirus had had on agriculture. No sector was unaffected but highlighted the significant impacts to dairy, ornamentals, beef, potatoes, malt and barley above others, of these beef and dairy are the most relevant. Market predictions show a potential 4% fall in UK beef and veal production, due to a drop in demand from the hospitality sector, ¹⁷ The dairy sector was also severely impacted by a lack of demand from hospitality. Research undertaken by the Agriculture and Horticulture Development Board (AHDB) suggest that during lockdown almost a quarter of GB dairy producers were faced with reducing their milk output and although analysts are confident of future 1% growth in the global market, they do highlight the impact Brexit could have. In addition to these hardest hit agricultural sectors, lamb farming makes up the majority of agricultural practice in the National Park which is predicted to see a 7% decline in production in the coming year. Messages coming from farming unions centres around the need to support diversification to ensure the long term future of farming. In addition to the shocks to agriculture brought about in shifting demand within lockdown, there is also the growing call for post-covid recovery to be centred on green growth. Farmers have a significant role to play in this and this should form part of any future more permissive farm diversification policy.
Significance	Review rural enterprise policy, and farm diversification policy. Devise supportive enabling policy in consultation with farming community and NRW.

Policy topic area	Environmental Policy
Contextual changes since PSI9	Publication of <i>Global Biodiversity Outlook 10</i> Publication of RSPB's <i>A lost Decade for Nature</i>
COVID-19 Impacts	The direct environmental benefits of COVID-19 formed through the unintentional outcomes of lockdown. The reduction of car journeys and manufacturing outputs led to a sharp fall in air pollutants. Although such decreases in air pollution associated with war, or recession always almost rebound to pre 'crisis' levels the 'quiet' of lockdown did engender an unprecedented interest in the healing power of nature and a significant interest in accessing areas of countryside for recreational purposes. This level of interest saw unprecedented levels of visitors both on the weekend prior to lockdown and when lockdown restrictions eased. The significance of the National Park to individuals strikes a chord with our original purposes for

¹⁷ <https://ahdb.org.uk/beef-market-outlook>

	<p>designation, that being healing a nation after the trauma of the second world war.</p> <p>Moreover the covid crisis highlighted the significance of habitat degradation to human health. A growing body of evidence (including that emerging from the UN¹⁸) highlight the increased risk of zoonotic disease such as coronavirus as a result of human exploitation of natural environments, such as) increasing human demand for animal protein; 2) unsustainable agricultural intensification; 3) increased use and exploitation of wildlife; 4) unsustainable utilization of natural resources accelerated by urbanization, land use change and extractive industries; 5) increased travel and transportation; 6) changes in food supply; and 7) climate change¹⁹.</p> <p>The RSPB in their report <i>A lost decade for nature</i> highlights the role that protected landscapes are supposed to play in supporting nature recovery²⁰ (and all that is embedded within the concept) yet have been prevented from so doing due to <i>reductions in resources</i> which have left bodies such as the National Park <i>either unwilling or unable to use their extensive powers to tackle these drivers of decline</i>.</p>
<p>Significance</p>	<p>The need for LDP2 to create and protect connected diverse habitat systems for human wellbeing and nature recovery is even more of an imperative than outlined in PSI9. The need for a strategy which centralises these issues for the benefit of all is a renewed priority for the Authority. This is seen as the critical part the NPA can play in ‘building back better’ and facilitating national healing from the coronacrisis.</p>

¹⁸ <https://www.unenvironment.org/resources/report/preventing-future-zoonotic-disease-outbreaks-protecting-environment-animals-and>

¹⁹ <https://wedocs.unep.org/bitstream/handle/20.500.11822/32860/ZPKMEN.pdf?sequence=1&isAllowed=y>

²⁰ In accordance with the Aichi Biodiversity Targets agreed under the Convention on Biological Diversity