

Submission of Evidence Form – National Development Framework

Name

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**on behalf of the 3 National Park Authorities (Brecon Beacons National Park Authority,
Pembrokeshire National Park Authority, Snowdonia National Park Authority)**

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Date

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Title of evidence

NDF - Call for Evidence – Response from the 3 Welsh National Parks

Summary of Evidence:

1. Landscape Protection at National Level

Strategic Areas for landscape protection should be included in the NDF – therefore the NDF should have regard to National Park (and AONBs) policy and purposes. The impacts of any proposals on the setting of these designations should also be respected.

Developers need certainty on strategic decision making for large development proposals (quarries, generating stations, National Grid infrastructure, motor racing circuits) – and recognising the unique and Special Qualities of National Parks / AONBs at an early stage is a necessary part of the strategic decision making and should be included in the NDF. Any ambiguity in such strategic factors in decision making can stifle projects – as has been seen through many large wind farms, National Grid infrastructure etc. Clearly identifying the role of designated landscapes and their setting will lead to less ambiguity and help front load decision making on commercial investments. This will contribute to the Well Being goals of a More Prosperous Wales, as well as contributing to the Well Being Goals of being a More Resilient Wales through effectively protecting our statutory landscape designations.

2. Recognition at National Level of Value of National Parks in Land Use Planning

Associated with the above point, the direct and indirect value of National Parks to the nation as a whole should be recognised – this includes their social, economic and environmental value. For example, there have been discussions about linking North Wales with England's 'Northern Powerhouse'. Whilst the importance of factors such as transportation links and local labour force to achieve this are frequently referenced e.g. A55 Corridor and the North Wales Coast Railway Line, it is often overlooked that there are 5 designated landscapes within 45-90 minutes of cities such as Liverpool and Manchester. A recognition of the role of these designated areas to the success of aligning North Wales to the Northern Powerhouse can only be achieved if there is a strategic recognition of the

value of National Parks. Therefore, the NDF should recognise the strategic value of these designated landscapes. They provide important 'breathing areas' for our communities, a place for the nation as a whole to connect with nature, and to keep healthy. They are also important economic drivers – with growth sectors such as adventure tourism (e.g. Zip World, Surf Snowdonia to name but two). They also provide high quality leisure opportunities to nearby conurbations and employers. Furthermore, NPAs are in a strong position to trial sustainable development projects – making them excellent test beds for many aspects of the Well Being of Future Generations Act.

3. National Contribution of Dark Sky Reserves to the Nation

Linked to the above is the Dark Sky Reserve status within 2 of our 3 National Parks. Not only do these Dark Sky Reserves provide areas of tranquillity and important biodiversity benefits, but they also provide significant economic benefits – allowing Wales to be branded or marketed at national level as a 'dark sky' friendly nation. This could be attractive to investors and it also had a direct tourism benefit. It also encourages tourist activities out of the traditional Summer season. Recognition of this would again help guide the strategic decision making of commercial investors, and would also potentially lead to better quality design in larger developments. Again this would help contribute to several Well Being Goals – including a more prosperous, resilient and globally responsible Wales.

4. Developments of National Significance

It is supported that policies and proposals for Development of National Significance should be included in the NDF.

5. National Grid Projects

Major National Grid projects such as the North Wales Connection Project should be included in the NDF – and its impact upon the protected landscapes should be a key consideration. This again will help contribute to effective strategic decision making, and ensure early community involvement with such projects in the Development Plan.

6. Housing Targets

Care is required in setting any housing targets or spatial distribution of housing in the NDF. Housing for local communities requires careful scrutiny at the local level, and the top down approach of providing targets or spatial distribution at national scale through NDFs may exclude important local input into this process. LDP Examinations in Public provide an appropriate forum to discuss these issues – there is a risk that there could be disenfranchisement of local communities if this part of the planning process is lost to NDFs. Therefore, the importance of having cohesive communities must be considered when determining how housing is allocated.

7. Strategic Employment Sites at National Level

"National scale" strategic employment sites should be included in the NDF. This is something that local planning authorities cannot sufficiently grasp at the local level – this may avoid the problem of over-allocating employment sites (which has happened to a certain extent in North Wales when each Local Planning Authority feel duty bound to allocate land within their locality). The direct or indirect impacts upon protected landscapes should be carefully considered should be carefully considered in doing this. Therefore there is a risk here of conflicting with the Well-being goals of 'cohesive communities' and 'vibrant culture and thriving Welsh language', unless careful consideration is given to such impacts.

8. Enterprise Zones

For clarity it is suggested that Enterprise Zones should be included in NDFs. At present, some EZs are seen as primarily areas for fiscal incentive in the first instance, and only as a land use planning zone secondly. It would make sense for the full strategic land use planning implications to be factored in earlier in the planning process – and the NDF is a natural place for this to happen. This would help provide a prosperous Wales, and would also contribute to the Wales of ‘cohesive communities’. This also links to point #7, above.

9. Strategic Transport Corridors

It is sensible that strategic transport corridors (improved north-south road links) or upgrades to transport corridors (e.g. electrification of North Wales Railway Line) are identified in the NDF, these should of course have full regard to avoid or minimise impacts upon National Park / AONB boundaries.

Summary of key issues/conclusions

The key issue is to recognise the strategic role that National Parks can play in the decision making that users of the NDF will undertake. Strategic investments need to understand the statutory role of National Parks in their decision making - and how they inter-relate with other strategic land uses. The multi-benefits (environmental, social and economic) of National Parks in Wales to strategic investments and the wider population of Wales should also be recognised and understood – the NDF provides a valuable opportunity to do this.

Why have you submitted this evidence?

To enable the strategic role of National Parks to be understood in the Welsh context.

How should this evidence inform the development of the NDF?

Explained above.

How does this evidence and any actions it recommends help achieve the 7 well-being goals?

Explained and referenced above.

Why is the evidence of national significance?

National Parks as the name implies are “national” designations – they impact upon national strategic decision making on land use. Their role, purpose and benefits need to be understood in the context of the NDF.

Do you agree for your evidence to be made public?

Yes.