

Sent via Email

Date: 14 November 2019

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Your ref:

Dear Sir or Madam

Draft National Development Framework: Representations on behalf of Bourne Leisure

On behalf of our client, Bourne Leisure Limited ("Bourne Leisure"), please find in the form below our representations on the Draft National Development Framework 2020-2040.

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain. The company welcomes over 4 million guests a year and employs a team of 17,000 in peak season.

In Wales, Bourne Leisure operates six holiday parks, along with a hotel under its Warner Brand. It is therefore a significant contributor to the Welsh economy, as well as local visitor economies and has a thorough understanding of the role of tourism and issues affecting the sector in Wales. The sites are:

- 1 Presthaven Sands Holiday Park;
- 2 Hafan y Mor Holiday Park;
- 3 Greenacres Holiday Park;
- 4 Quay West Holiday Park;
- 5 Kiln Park Holiday Centre;
- 6 Lydstep Beach Holiday Park; and
- 7 Bodelwyddan Castle Hotel.

Tourism is one of the key drivers of Wales' economy and the emerging National Development Framework should provide a positive national strategy to ensure that this part of the economy goes from strength to strength.

We trust that these representations are clear and will assist the Welsh Government in finalising the emerging National Development Framework. Please do not hesitate to contact me should you require any clarification

The logo for LICHFIELDS, featuring the word "LICHFIELDS" in white, uppercase, sans-serif font, positioned within a black L-shaped graphic.

on any of the points made. We would be grateful if you would keep us informed of progress on the emerging Framework.

Yours faithfully



Lewis Conde
Associate Director
Copy Bourne Leisure

Consultation Response Form

Your name	Lewis Conde (Lichfields)
Your address	Helmont House Churchill Way Cardiff CF10 2HE
Preferred contact details (email/phone/post)	<div></div> <div></div> <div></div>
<u>Organisation (if applicable)</u>	Lichfields on behalf of Bourne Leisure Limited

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

Outcome 2

Outcome 2 in the Draft National Development Framework (NDF) is summarised on page 18 as:

"A Wales where people live....

2. in vibrant rural places with access to homes, jobs and services."

This Outcome is outlined in more detail on page 20:

"In rural areas, job opportunities and community services will be supported to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live and work. There will be support for the agricultural sector and its supply chains to boost resilience through diversification."

We consider that this draft Outcome should be amended to better support the vitality of rural communities by recognising the particular importance of the tourism industry in providing jobs, attracting investment and generating visitor expenditure in these areas.

Planning Policy Wales (PPW) (edition 10, December 2018) states at paragraph 5.5.3:

"In rural areas, tourism-related development is an essential element in providing for a

healthy and diverse economy.”

It also states at paragraph 5.6.1:

“A strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new enterprises and the expansion of existing business is crucial to the growth and stability of rural areas.”

In order to align with PPW and to support rural communities, Bourne Leisure proposes that Outcome 2 (page 20) in the draft NDF is amended as follows:

“In rural areas, job opportunities and community services will be supported to help attract and retain people. A balance will be found between development and preserving the character of rural Wales, ensuring our small towns and villages have bright futures as attractive places to live, and work and visit. There will be support for the agricultural and tourism sectors and its their supply chains to boost resilience through diversification.” (proposed amendments underlined)

Outcome 6

The Draft NDF states at Outcome 6:

“Development Plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses.”

We endorse the aspiration in draft Outcome 6 for the culture, heritage and environment of Wales to attract the “interest and expenditure of tourists”.

This provision reflects the recognition of the importance of the tourism industry to the Welsh economy as emphasised in PPW, which states at paragraph 5.5.1:

“Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales.”

It also aligns with one of the seven goals of the Well-being of Future Generations Act, “A Resilient Wales”, as stated in PPW on page 74:

“A Resilient Wales is supported by our agriculture and tourism industries and through the beauty of our natural, built and historic environment.”

2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

Policy 4 accompanying text, page 29

The draft NDF states on page 29 in the accompanying text to Policy 4:

“Priority should be given to economic activities with strong links to rural areas, including food and drink processing, energy generation, tourism and leisure, the environmental economy and businesses ancillary to farming, forestry and other rural economic activities.”

We endorse this proposed approach in giving priority to economic activities with strong links to rural areas, including tourism and leisure.

This recognition of the importance of the tourism industry for the economy of Wales, reflects the national policy position of PPW at paragraph 5.5.1:

“Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.”

It also reflects the specific role of the tourism industry in the rural economy, as recognised by PPW at paragraph 5.5.3:

“In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy.”

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

[illegible]

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

[illegible]

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know	No opinion
Large scale wind and solar developments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
District heat networks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

Green infrastructure

Policy 8

The draft NDF states at Policy 8:

"To ensure the enhancement of biodiversity and the resilience of ecosystems, the Welsh Government and its key partners will identify:

- areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.*

Planning authorities should include these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide.

In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development

proposals through innovative, nature-based approaches to site planning and the design of the built environment.”

Bourne Leisure considers that opportunities should be provided to comment on and potentially to influence any areas to be safeguarded as ecological networks and any requirements for “*nature based solutions*” as part of development proposals. Consultation and engagement should take place both at the stage of identifying any areas to be safeguarded and as part of the Strategic Development Plan (SDP) or Local Development Plan (LDP) preparation process. Taking on board the views of stakeholders at both of these stages will help in the identification of solutions to prevent conflict between the need to safeguard ecology and the need to protect other sustainability objectives, such as creating resilient local economies.

Consultation and engagement, including in relation to the natural environment, is a key planning principle, as stated in PPW at Figure 3:

“Our built and natural environments should be planned to promote mental and physical well-being. The best way of achieving this is to involve and collaborate with others to ensure issues are understood and prevented at the earliest opportunity through effective engagement with those affected by or having an interest in the development concerned.”

For the reasons provided, and in order to comply with this key planning principle, we propose that draft Policy 8 is amended so that it is explicit that opportunities will be provided to comment and influence any areas to be safeguarded. We therefore suggest the following amendment:

“To ensure the enhancement of biodiversity and the resilience of ecosystems, taking into account the views of landowners and occupiers, the Welsh Government and its key partners will identify:

- areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.*

Planning authorities should include take account of these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide.

In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.” (proposed amendments underlined)

Policy 9

The draft NDF states at Policy 9:

“The Welsh Government is committed to developing a national forest, and will identify appropriate delivery sites and mechanisms to achieve this aim. Action to safeguard proposed locations for the national forest will be supported.”

The draft NDF is unclear as to whether the national forest is to be identified and allocated through strategic and local development plans and therefore supported by an evidence base and subject to public scrutiny, or alternatively if alternative mechanisms will be used to identify/secure the relevant land.

We consider that opportunities should be provided to comment on and potentially to influence the proposed locations for and mechanisms to deliver the national forest. This would help to prevent conflict between the aim to develop the national forest and other sustainability objectives.

Consultation and engagement as part of the planning system, including in relation to the natural environment, is a key planning principle, as stated in PPW at Figure 3:

“Our built and natural environments should be planned to promote mental and physical well-being. The best way of achieving this is to involve and collaborate with others to ensure issues are understood and prevented at the earliest opportunity through effective engagement with those affected by or having an interest in the development concerned.”

For the reasons provided, and in order to comply with this key planning principle, we propose that draft Policy 9 is amended as follows:

“The Welsh Government is committed to developing a national forest, and, taking into account the views of landowners and occupiers, will identify appropriate delivery sites and mechanisms to achieve this aim. Action to safeguard proposed locations for the national forest will be supported.” (proposed amendments underlined)

Policy 10

The draft NDF states at Policy 10:

“The Welsh Government supports large scale on-shore wind and solar energy development in the identified Priority Areas for Solar and Wind Energy. There is a presumption in favour of development for these schemes and an associated acceptance of landscape change.

When determining planning applications for large scale on-shore wind and solar energy development in Priority Areas, significant weight will be given to the proposal’s contribution to reducing Wales’ greenhouse gas emissions and meeting our decarbonisation and renewable energy targets.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and the following adverse impacts have been minimised:

- *landscape and visual impacts;*
- *cumulative impacts;*
- *the setting of National Parks and Areas of Outstanding Natural Beauty;*
- *visual dominance, shadow flicker, reflected light or noise impacts;*
- *electromagnetic disturbance to existing communications systems; and*
- *the following identified protected assets:*
 - *archaeological, architectural or historic assets;*
 - *nature conservation sites and species;*
 - *natural resources or reserves.*

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site."

Bourne Leisure endorses the proposed approach that planning applications for large-scale on-shore wind and solar energy developments must demonstrate how local social, economic and environmental benefits have been maximised. Developments of this nature can have significant and far reaching impacts and therefore it is important that potential benefits are maximised.

Bourne Leisure also endorses the recognition in this policy of the need to protect against "*visual dominance, shadow flicker, reflected light or noise impacts*". This is particularly important for the tourism industry, and holiday park accommodation, as caravan and camping uses are especially vulnerable to adverse impacts such as these. As a result, holidaymakers can be deterred from visiting or returning to an area, which will have a detrimental effect on the local economy.

The requirement for plans to be put in place for the end of the development's lifetime to remove all infrastructure and secure an appropriate after-use for the site is also endorsed. This will help to protect the natural environment, which forms a key driver for the tourism industry.

However, Bourne Leisure object to the element of proposed wording of Policy 10 that only seeks to "minimise" adverse impacts for large scale wind and solar development in Priority Areas. It is considered that proposals for any wind and solar development within the Priority Areas should seek to avoid adverse impacts. This requirement should apply to all wind and solar development, not just large-scale development. This is of key importance in order to avoid causing harm to vulnerable or sensitive land uses and to protect the interests of the local economy.

This view is consistent with the requirements of PPW, paragraph 5.9.12, which states:

"The Welsh Government accepts the introduction of new, often very large structures for on-shore wind needs careful consideration to avoid and, where possible, minimise their impact."

We therefore propose that draft Policy 10 is amended as follows:

“The Welsh Government supports large scale on-shore wind and solar energy development in the identified Priority Areas for Solar and Wind Energy. There is a presumption in favour of development for these schemes and an associated acceptance of landscape change.

When determining planning applications for large scale on-shore wind and solar energy development in Priority Areas, significant weight will be given to the proposal’s contribution to reducing Wales’ greenhouse gas emissions and meeting our decarbonisation and renewable energy targets.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and the following adverse impacts have been avoided, or where this is not possible, minimised:

- *landscape and visual impacts;*
- *cumulative impacts;*
- *the setting of National Parks and Areas of Outstanding Natural Beauty;*
- *visual dominance, shadow flicker, reflected light or noise impacts;*
- *electromagnetic disturbance to existing communications systems; and*
- *the following identified protected assets:*
 - *archaeological, architectural or historic assets;*
 - *nature conservation sites and species;*
 - *natural resources or reserves.*

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development’s lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site.” (proposed amendments underlined)

Policy 11

The draft NDF states at Policy 11:

“Outside of the Priority Areas for Solar and Wind, planning applications for large scale wind and solar development must demonstrate the proposal is acceptable, in accordance with the criteria below.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:

- *landscape and visual impacts;*
- *cumulative impacts;*
- *the setting of National Parks and Areas of Outstanding Natural Beauty;*
- *visual dominance, shadow flicker, reflected light or noise impacts;*
- *electromagnetic disturbance to existing communications systems; and*
- *the following identified protected assets:*

- archaeological, architectural or historic assets;
- nature conservation sites and species;
- natural resources or reserves.

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site."

Bourne Leisure endorses the recognition in this policy of the need to protect against "visual dominance, shadow flicker, reflected light or noise impacts". This is particularly important for the tourism industry, and holiday park, as caravan and camping uses are especially vulnerable to adverse impacts of these types. As a result, holidaymakers can be deterred from visiting or returning to an area, which then has a detrimental effect on the local economy.

Bourne Leisure also endorses the requirement for plans to be put in place for the end of the development's lifetime to remove all infrastructure and secure an appropriate after-use for the site. This will help to protect the natural environment, which forms a key driver for the tourism industry.

However, Bourne Leisure object to the element of proposed wording of Policy 11 that only protects against unacceptable adverse impacts for "large scale" wind and solar development outside of the Priority Areas. Bourne Leisure considers that this requirement should extend to all wind and solar development proposals, not just large-scale development.

This view is based on the requirements of PPW, paragraph 5.7.7, which states:

"The planning system should secure an appropriate mix of energy provision, which maximises benefits to our economy and communities whilst minimising potential environmental and social impacts." (emphasis added)

We therefore propose that draft Policy 11 is amended as follows:

"Outside of the Priority Areas for Solar and Wind, planning applications for ~~large scale~~ wind and solar development must demonstrate the proposal is acceptable, in accordance with the criteria below.

Planning applications must demonstrate how local social, economic and environmental benefits have been maximised and that there are no unacceptable adverse effects on, or due to, the following:

- landscape and visual impacts;
- cumulative impacts;
- the setting of National Parks and Areas of Outstanding Natural Beauty;
- visual dominance, shadow flicker, reflected light or noise impacts;
- electromagnetic disturbance to existing communications systems; and
- the following identified protected assets:
 - archaeological, architectural or historic assets;
 - nature conservation sites and species;

- *natural resources or reserves.*

Suitable access to the site for construction and maintenance purposes must be provided. Plans must also be in place for the end of the development's lifetime, including the removal of all infrastructure as soon as their use ceases and the appropriate after-use of the site." (proposed amendments underlined)

Policy 13

The draft NDF states at Policy 13:

"Proposals for other large scale renewable energy generation will be determined in accordance with the criteria of policy P11."

In accordance with our representation above on draft Policy 11, we consider that planning applications for all renewable energy developments (not just large scale development) should demonstrate that there are no unacceptable adverse impacts.

In addition to the proposed changes to draft Policy 11, we therefore request the following change to draft Policy 13:

"Proposals for other large-scale renewable energy generation will be determined in accordance with the criteria of policy P11." (proposed amendments underlined)

8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The NDF identifies three overall regions of Wales, each with their own distinct opportunities and challenges. These are North Wales, Mid and South West Wales, and South East Wales.

We have identified Wrexham and Deeside as the main focus of development in North Wales. A new green belt will be created to manage the form of growth. A number of coastal towns are identified as having key regional roles, while we support growth and development at Holyhead Port. We will support improved transport infrastructure in the region, including a North Wales Metro, and support better connectivity with England. North West Wales is recognised as having potential to supply low-carbon energy on a strategic scale.

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

[illegible]

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

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12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Tourism Policy Focus

The Draft NDF recognises that the tourism industry is important to the Welsh economy but does not include a policy focus to support its continuity and growth.

The Draft NDF states at Outcome 6:

“The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists, and providing a distinctive and trusted brand for Welsh businesses.”

It also states in the accompanying text to Policy 4 (in relation to supporting rural communities):

“Priority should be given to economic activities with strong links to rural areas, including food and drink processing, energy generation, tourism and leisure, the environmental economy and businesses ancillary to farming, forestry and other rural economic activities.”

This acknowledgement of the importance of the tourism industry for the economy of Wales, reflects the national policy position of PPW at paragraph 5.5.1:

“Tourism involves a wide range of activities, facilities and types of development and is vital to economic prosperity and job creation in many parts of Wales. Tourism can be a catalyst for regeneration, improvement of the built environment and environmental protection.”

As the NDF will set the direction for development throughout Wales and influence the policies to be developed under both strategic and local development plans, we consider it essential that the emerging NDF provides a specific policy focus to support the growth of the tourism industry. This approach should provide support for a range of holiday accommodation types across Wales, including hotels and holiday parks.

As such, we propose that the following text is added to the draft NDF:

“Policy (x – new) – Tourism development

The Welsh Government supports the growth of the tourism industry throughout Wales. Strategic and Local Development Plans should plan positively to attract and retain visitors and support jobs in the tourism sector, including through the provision of a range of holiday accommodation and tourism facilities.”

Without the inclusion of a specific tourism policy there is a risk that tourism issues will be overlooked in decision making. Similarly, there is a risk that tourism policies are likely to have a reduced role in strategic and/or local development plans. Crucially, when considering where to invest in new or existing tourism facilities, the policy support (or lack of it) will be a key factor influencing the investment decisions for many businesses. In the absence of appropriate policy support, future investment may be diverted, out of Wales, to alternative assets in locations where there is greater certainty that projects will be supported, leading to negative economic and social impacts.

North Wales

The draft NDF states on page 52:

“Tourism is an important sector to the economy across North Wales. Strategic and Local Development Plans should consider the main tourism areas, the type of visitors they attract and the infrastructure required to support existing areas and future growth.”

Bourne Leisure endorse this recognition of the importance of the tourism sector to the North Wales economy. The significance of tourism to the region is evidenced by research published by the Welsh Government in August 2018¹, which states that on average, between 2014 and 2016, North Wales attracted a total of 31.5 million visits and £1.8 billion in related expenditure per annum. This study also states that, between 2013-2015 and 2014-16, the average volume of all tourist visits to North Wales increased by 4% compared to a 0% increase in Wales overall, and tourism expenditure increased by 10% compared to 4% across Wales.

Based on this key role of the tourism industry and its potential for growth in the region, Bourne Leisure endorse the proposed requirement for Strategic Development Plans (SDPs) and Local Development Plans (LDPs) to consider the infrastructure required to support both existing areas and future growth. This approach will help to support the tourism industry, respond to the changing demands of visitors and maximise its benefits for the local economy in relation to creating jobs, attracting investment and generating visitor expenditure.

Mid and South West Wales

The draft NDF states on page 60:

“The Mid and South West region supports a large and diverse tourism industry. Development plans and decisions on planning applications should provide a positive framework to support growth and ensure that communities across all parts of the region are able to benefit from their landscapes, natural and historic environment, heritage assets and visitor attractions to support and grow their economies. It is important the region’s distinctive heritage is preserved and enhanced by high quality development.”

Bourne Leisure endorse this recognition that the Mid and South West region supports a large and diverse tourism industry. Research published by the Welsh Government in August 2018² indicates that the Mid and South West region attracted an average of 36.7 million visits per annum between 2014 and 2016.

Bourne Leisure also endorse the proposed requirement for development plans and decisions on planning applications to provide a positive framework to support growth in the tourism industry.

This approach aligns with the national policy approach to tourism development, particularly for rural areas, which characterise much of the Mid and South West Wales region.

PPW states at paragraph 5.5.3:

“In rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy.”

¹ Welsh Government Local Authority Tourism Profiles 2014-16: North Wales (August 2018)

² Welsh Government Local Authority Tourism Profiles 2014-16: West Wales (August 2018) and Welsh Government Local Authority Tourism Profiles 2014-16: Mid Wales (August 2018)

It also states at paragraph 5.6.1:

“A strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new enterprises and the expansion of existing business is crucial to the growth and stability of rural areas.”

Need for Examination & Scrutiny

The Development Plan system is founded on demonstrating plans are ‘sound’ with an evidence base that establishes the viability and deliverability of its proposals. No evidence has been provided to support the draft NDF policies or outcomes or to indicate that they are deliverable. Future SDPs and LDPs will need to conform to the NDF but also prove through examination that they are deliverable, based on robust evidence. There is significant potential for conflict between the untested NDF and the evidence-based SDPs and LDPs that could seriously jeopardise development plan preparation and undermine the plan led system.

Given the NDF will form part of the statutory development plan we consider that it should be subject to examination and scrutiny to ensure that it meets the tests of soundness that are conventionally required of a development plan.

Proper examination and scrutiny of the draft plan is fundamental as once adopted the NDF will have major impacts on policy decisions throughout Wales for the duration of the plan period. In addition to influencing the production of SDPs and LDPs, there will also be an interim period prior to the adoption of SDPs and new/replacement LDPs whereby a policy vacuum is likely to exist for many LPAs. As such, the NDF will take on a heightened role in decision-making due its development plan status. Given the weight that will be afforded to the NDF it is paramount that the plan is robust and justified on sound evidence. Consequently, we consider it is necessary for the plan to be subject to examination and public scrutiny, as per traditional development plans.

Alternatively, if the draft plan is not to be examined in public, we consider that it should instead only be a material consideration in the formation of SDPs and LDPs, more akin to the role that the Wales Spatial Plan has played in helping local planning authorities prepare their LDPs.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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