

Department for Natural Resources
Adran Adnoddau Naturiol



Llywodraeth Cymru
Welsh Government

Rebecca Jones
Head of Planning Policy
Awdurdod Parc Cenedlaethol Eryri
Swyddfa'r Parc Cenedlaethol
Penrhyndeudraeth
Gwynedd
LL48 6LF

Ein cyf: Our ref: qA1255872

09 April 2018

Dear Mrs Jones,

Snowdonia National Park Authority – 1st Revision (Short Form Procedure) Proposed Focussed Changes Consultation: Welsh Government Response

Thank you for consulting the Welsh Government regarding the Snowdonia National Park Authority Local Development Plan (LDP) 1st Revision (Short Form Procedure) proposed Focussed Changes. This is the first Authority to undertake a short form revision in Wales. We acknowledge that the preparation of a LDP and its supporting evidence is a significant undertaking and recognise the amount of work your Authority has undertaken to date in moving the plan forward to examination and responding positively to the Inspectors concerns.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The proposed Focussed Changes have been considered in the light of the representations made to the Deposit Plan on 17 August 2017 and in accordance with the tests of soundness. The attached **Annex** provides a detailed response on whether the Schedule of Proposed Focussed Changes meets the matters raised in our deposit representations. Further to the above, we have considered the updated background papers that form part of this consultation and have made comments as to whether these updates address our previous comments. The annex sets out where and why our objections are still maintained, and if the Inspector deems it appropriate, they can be addressed, amended, or clarified through the hearings sessions.

In respect of our representations on affordable housing targets/viability, we note the Inspector has similar concerns and has asked the authority in his letter dated 09th February 2018 to undertake additional work on this basis. We will comment on these aspects when the opportunity arises.

Without prejudice to the Minister's powers to intervene later in the process and to the independent examination, the Welsh Government is committed to helping Local Planning Authorities throughout the LDP process.

Yours sincerely,



Mark Newey
Head of Plans Branch
Planning Directorate

Annex: Snowdonia National Park Authority – 1st Revision (Short Form Procedure) Proposed Focussed Changes Consultation: Welsh Government Response

| F.Ch | Welsh Government (WG) Comments |
|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chapter 2: Development Strategy | |
| <p>NFf06 & NFf34</p> <p><u>Objection maintained</u></p> | <p><u>Strategic Policy C: Spatial Development Strategy</u></p> <p>The Welsh Government made representations to the Deposit Plan that ranges within this policy add confusion to the plan. It is unclear why ranges are still required given the added detail now included in the plan in terms of housing components by settlement tier. In addition NFf34 monitoring framework also states that the trigger points are +/- 20% of these ranges. This adds further confusion and ambiguity. The monitoring framework should link to the spatial distribution as set out table 5.7.</p> <p>The updated components in the supply table, now amended by (NFf16) are clear as to where development is directed within the settlement hierarchy, by housing component. This is supported. However, as previously stated the WG would welcome clarification on how the percentage targets and numbers in this policy have been calculated, how they relate to the components of supply, including how they will be implemented and monitored.</p> |
| Chapter 3: Protecting and Enhancing the Natural Environment | |
| <p>NFf05, 07 & 13</p> <p><u>Objection addressed in full</u></p> | <p><u>Paragraphs 1.66, 3.1 & 3.45 – Regional Waste Plan references</u></p> <p>Support the removal of references to Regional Waste Plans (RWPs)</p> |

| | |
|------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>NFf11</p> <p><u>Objection partially maintained</u></p> | <p><u>Development Policy 3: Energy</u></p> <p>What are the ‘planning considerations’ in the SPG? The policy should contain everything it needs to determine a planning application; in essence it is not appropriate to decant policy criteria to SPG. Some explanation on this matter would be beneficial to ensure that the policy will work as intended.</p> <p>What are the ‘considerations’ in bullet point two? What part of the policy does it relate too? The policy is unclear in this respect and would benefit from further explanation.</p> <p>The authority should include the Table set out in Appendix 2 of the revised REA within the LDP setting out the installed capacity for the plan period by technology to align with national policy. The monitoring framework should also reflect this approach. The authority should look at recently adopted LDPs on this basis prior the hearings sessions.</p> |
| <p>NFf12</p> <p><u>Objection maintained.</u></p> <p><u>Objection addressed in full.</u></p> <p><u>Unclear.</u></p> | <p><u>Strategic Policy E: Minerals Safeguarding Policy</u></p> <p>Policy E1 still only safeguards Category 1 mineral resources on the Proposals Map. WG Deposit objection remains as an objection as the policy should safeguard Category 1 & 2 mineral resources, as per CPO Letter (14 November 2012) – see link to BGS Map which clearly shows Category 1 & 2 being safeguarded. This requires amendment.</p> <p>Policy E1, criterion iii) has been amended to include the phrase ‘sterilise the resource’. This meets WG objection in full.</p> <p>Buffer Zones – Paragraph 3.2 (Background Paper 9 – Minerals, November 2017) has removed reference to 100m & 200m buffer zones. However, it is unclear if these have been amended on the Proposals Map in line with WG objection at Deposit stage.</p> |
| <p>NFf14</p> <p><u>Objection addressed in full.</u></p> | <p><u>Development Policy 4: Waste</u></p> <p>Support the Focussed Change.</p> |

Chapter 5: Promoting Healthy and Sustainable Communities

| | |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| NFf15 | <u>2014 projections amend para 5.4</u> |
| <u>Objection addressed in full</u> | Support the update and the consideration of the 2014 household projections within updated Background Paper 7A – Housing (November 2017). |

| | |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NFf16 | <u>Para 5.7 Housing Supply Components Table</u> |
| | The WG support the amended table and consider removal of the terms ‘subject to further refinement’ and ‘approximate’ add clarity and remove ambiguity in the plan. |

Housing Provision and Requirement

| | |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NFf20 | <u>Strategic Policy G: Housing</u> |
| <u>Partially maintained</u> | <p>The WG had previously made representations that core elements of the plan should be included in policies not the reasoned justification. This was to ensure planning decisions could be linked to policy and ensure effective monitoring of the plan. The proposed amendments to this policy which now include reference to the requirement, provision and density requirements are supported and add clarity to the plan.</p> <p>However, the WG considers that Policy G is an affordable housing policy and the authority should consider renaming it as such. The amendments proposed (NFf20) would be more appropriately included as a separate policy to be included in section 5.4 of the Deposit Plan. This would add clarity, readability and structure as all supporting reasoned justification, tables on housing supply/components and site allocations would flow from it. The policy could also make reference to the affordable housing target, for example <i>“makes provision for 810 dwellings, of which 350 will be affordable up to 2031”</i> The affordable housing target should be included within a policy not the reasoned justification.</p> <p>In summary, the authority should consider the order and structure of the housing chapter in respect of how the housing and affordable housing policies, reasoned justification are presented. This does not change the content/strategy of the plan, but will ensure key elements are included within appropriate policies, supported by reasoned justification in a coherent manner.</p> |

Chapter 6: Supporting a Sustainable Rural Economy

| | |
|-------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>NFf21</p> <p><u>Objection partially maintained</u></p> | <p><u>Para 6.5 and Policy H: Sustainable Rural Economy</u></p> <p>The additional reference to safeguarding existing employment sites is supported and partially addressed our concerns in this respect; however, it is not clear from the focussed change what/where they are. They should be listed in a policy and identified on the proposals map. As stated in our Deposit representation, the NPA should consider whether a separate policy on safeguarding would add clarity to the plan given that many of the criteria under this policy may not apply to safeguarded employment sites.</p> |
| <p>Nff22</p> <p><u>Objection addressed in full</u></p> | <p><u>Para 6.11 – 6.13 and Policy 19</u></p> <p>The WG Supports the proposed amendments that introduce flexibility in terms of the rural economy in line with national policy.</p> |
| <p>NFf32</p> <p><u>Objection addressed in full</u></p> | <p><u>Para 6.11 – 6.13 and Policy 19</u></p> <p>The Welsh Government supports the focussed change that deletes ‘occupation’ now replaced by ‘occupant’. The proposed change addressed our concerns in this respect.</p> |

Background Paper 7A (November 2017)

| | |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><u>Objection maintained</u></p> | <p><u>Housing Trajectory & 5 Year Land Supply</u></p> <p>The WG made representations at Deposit stage regarding five year supply and the need for a housing trajectory to demonstrate timing, phasing, and flexibility in the plan. Appendix 1 is still incorrect as the total cumulative completions are 810 units at the end of the plan period. This is incorrect as this should total the requirement, not the provision. On this basis it is not clear if there is a 5 year supply at adoption or through the plan period. The LPA would benefit from looking at the trajectories from recent examinations prior to the hearing sessions.</p> <p>In addition it also appears that the supporting graph does total a provision of 810 units? However, the graph demonstrates that there is no flexibility from 2022 onwards. Is the plan sufficiently flexible to deal with unforeseen circumstances? The WG has also made comments on the lack of a large windfall allowance which may/may not assist on this basis.</p> |
|-------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | |
|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><u>Objection maintained</u></p> | <p><u>Large Site Windfall Allowance (Clarity of Housing Components)</u></p> <p>The WG made representations at Deposit stage seeking clarification on why there was no large windfall allowance in the plan. The explanation provided in para 34 of the revised Background Paper 7A is unclear and does not provide significant justification as to why there is no large windfall allowance in the plan. The text suggests there have been at least 3 large windfall sites since adoption of the LDP which were unpredicted and could not be identified? This statement is unclear and requires further explanation. This is the nature of windfall development. The authority need to explain what historic trends there have been in respect of large windfalls and consider whether an allowance should be embedded in the plan. This is particularly pertinent given there is potentially no flexibility in the plan from 2022 onwards.</p> |
| <p><u>Objection partially maintained</u></p> | <p><u>Appendix 5 – Delivery of Allocated Sites</u></p> <p>The WG made representations at Deposit stage seeking clarification on the delivery information in respect of site allocations in respect of timing phasing, costs and funding mechanisms. The introduction of Appendix 5 is supported however it does not always contain detailed phasing information. For example some sites state 'very likely to be developed in one phase', what does this mean? The Appendix should be amended to give more detailed phasing information, linked to the trajectory. The Appendix should also be embedded within the plan itself.</p> |
| <p><u>Objection addressed in full</u></p> | <p><u>Gypsy and Travellers Accommodation Needs Assessment</u></p> <p>The WG made representations at Deposit Stage seeking clarification on the level of need and sought changes to the criteria based policy in order to bring it in line with national policy. In respect of the updates to the Background Paper that clarifies there is no need within the National Park, these are supported and address our concerns in this respect.</p> |

APPENDIX 26 – Officer Summaries & Draft Officer Responses

| | |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><u>Objection maintained</u></p> <p><u>FC - OMISSION</u></p> | <p><u>Gypsy and Travellers Criteria Based Policy (Policy 13)</u></p> <p>In respect of the criteria based policy the WG disagrees with the comments on page 29 of the Officer Summary Responses Doc. The criterion in respect of 'evidencing need' remains contrary to current national policy. A revised G&T Circular is expected to be published prior to the start of the hearing sessions in July which re-enforces this position.</p> |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|