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Eich cyf : Your ref  
Ein cyf : Our ref A-PP030-01-003  
Dyddiad : Date 7<sup>th</sup> December 2011

Dear Ms Nettleton,

**Brecon Beacons National Park – Focus Changes consultation**

Thank you for the consultation package dated 26<sup>th</sup> October 2011 enclosing the Focused Changes Report and other submission documents.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. We have considered the focussed changes (FCs) in the light of the representations we made to the Deposit Plan and in accordance with the consistency and coherence & effectiveness tests (principally in accordance with whether satisfactory regard has been given to national planning policy - test C2). We indicate in the attached annex whether the FCs meet the matters raised in our deposit representations.

Accordingly, some reservations still remain with regard to: the clarity of the distribution of growth; the flexibility allowance included in the plan; consistency with national planning policy and some further minor issues as detailed in the annex. We have not provided any representation where a FC does not address any of our earlier deposit plan representations and where we do not object to the change proposed.

Yours sincerely

**Mark Newey**  
**Head of Plans Branch**  
**Planning Division**

***annex***

## Annex to Welsh Government's letter (7<sup>th</sup> December 2011) in response to Brecon Beacons proposed Focus Changes

### Distribution of housing:

The changes made to the renumbered Chapter 4, has clarified certain aspects regarding affordable housing numbers however a comparative analysis of the settlement tiers would improve the clarity of the plan, for example a table including information on completions/ those with planning permissions/ allocations and expected windfalls for each tier of settlements would clarify how the plan is delivering on its strategy. This information would also aid in clarifying the number 75, indicated in the plan as the estimated number for non-allocated affordable housing numbers and the figure of 498 windfalls included in 6-T-5.

### Flexibility:

There is no proposed change included in the plan which would allow for some flexibility in the overall level of housing provision to accommodate some sites not coming forward. It would improve flexibility if 10% was built into plan to allow for sufficient flexibility. Consequently, the plan should make provision for the 1331 expressed in the focused changes, plus a flexibility percentage, to enable delivery of the 1331 units the plan is seeking to achieve. It isn't clear whether the figure of 498 included in 6-T-5 allows for this flexibility.

It still remains unclear as to how the sub-levels within the settlements levels would provide flexibility (now paragraph 4.1.1.3)

Focus Change	Policy issue	Comment
6-P-28	Affordable Housing	Consistency is required between policies to ensure that all policies are delivering the authority's intention of delivering affordable housing e.g. the links between LGS LP2, CYD LP1 and Policies 15 and 18 (7-P-11). Further more, if there is no need for affordable housing, there should be no 'need' for any further general housing. Low cost housing is not in accordance with the definition of affordable housing. Only affordable housing, for levels 4 & 5.  It is not clear what 'low-cost market housing' might mean, and how these could replace the need for affordable housing.
6-T-5	Deliverability	It remains to be the case that the largest proportion of housing is to be delivered post 2016. A windfall figure of 498 dwellings has been introduced; it is not clear where these will be located and whether they correspond to the housing

		need in the authority.
4-T-57	Flood Risk	This FC has introduced a different definition to national policy in relation to highly vulnerable development; it would be helpful if the wording was consistent with the wording contained in Technical Advice Note 15.
6-T-29	Gypsy and Traveller site provision	It is noted that this change makes provision for a site, however further clarification is required to explain whether this site accommodates the level and type of need required in the region.
	Waste	Clarity is required whether the remaining capacity meets the needs.
	Policy Wording	Some policy wording introduces ambiguity into the plan e.g. "to the satisfaction of the NPA"; and Policy B LP 1 (FC 3-P-14).
	Settlement boundary and extent	There seems to be no difference between boundary and extent. This isn't helped when you look at FC3-P-30 which states: "Settlement Extent is drawn to reflect previously agreed settlement boundaries..."