

Brecon Beacons National Park LDP Regulation 15 Pre-Deposit Consultation: Welsh Assembly Government Response

(We note that a **SELF-ASSESSMENT** based on the soundness tests has been PROVIDED at Preferred Strategy stage (at Appendix2 Statement of Conformity); LDP Manual 6.5.1)

P1 - Prepared in accordance with the Delivery Agreement including the CIS

<u>Comments</u>	<u>Suggested Actions</u>
We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies (page 65).	N/A

P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)

<u>Comments</u>	<u>Suggested Actions</u>
<p>SA/SEA: We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy advises that it has been subject to SA/SEA; supporting documentation (prepared by C4S, Centre for Sustainability) is the <i>Initial Sustainability Appraisal Report, and Non Technical Summary (C4S)</i> (Dec'08). The Initial Sustainability Appraisal Report (ISAR) is subject to current consultation. <p>Habitats Appropriate Assessment (HRA): We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy has undergone the first key stage (screening for likely significant effects) of the HRA and is subject to consultation and advice from CCW; - para 2.1 of the Preferred Strategy advises that it has been subject to HRA (we note that the SA/SEA & HRA are running in parallel but are clearly distinguishable); supporting document is the <i>Habitats Regulation Assessment Screening Report, December 2008</i> which is subject of current consultation. - The HRA screening report concluded that there is potential for likely significant effect at four European sites [Llangorse Lake SAC, River Usk SAC, River Wye SAC and Usk Bat Sites SAC] as a result of identified 	N/A

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<p>impacts arising primarily from the housing and employment allocations proposed within the National Park. The assessment recommends that further screening work is undertaken when specific site allocations are known, to ensure that the HRA is effective in determining impacts and protecting European sites.</p> <p>When discussing housing allocations, the HRA screening report reads as if it were referring to a Local Development Framework, whereby a separate plan document would be produced that deals with site allocations. As a Local Development Plan is one document, which will contain site allocations, the question of whether appropriate assessment is required cannot be deferred. We therefore consider the HRA screening exercise to be 'work in progress' and would expect to see a final screening report that is conclusive about whether appropriate assessment is required.</p>	<p>Ensure compliance with Part IVA of the Conservation (Natural Habitats &c.) Regulations 1994 Habitats Regulations including ensuring the HRA screening conclusions are clear and that CCW have been consulted.</p>
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C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.	
<u>Comments</u>	<u>Suggested Actions</u>
<p>We note that section 2 sets out how the Preferred Strategy considers the national, regional and local policy framework within which the Preferred Strategy has been prepared. It outlines the policy framework and refers to a number of the key relevant plans, policies and strategies which include:</p> <p>National: PPW (2002), WSP:People, Places, Futures (2008),</p> <p>Regional: South Wales Regional Technical Statement for Aggregates (2008), South East Wales Regional Waste Plan 1st Review (Aug 2008), South West Wales Regional Waste Plan 1st Review (Aug 2008)</p> <p>Local: Brecon Beacons National Park Management Plan</p> <p>BBNP LDP Evidence Base (14) – Draft Issues Papers; 1) Sustainability and Climate Change; 2) Issues, Vision and Objectives; 3) Strategic Development Options; 4) Population and Housing; 5) Economic development & Employment, Transport and Retail and Town Centres.</p> <p>The draft issues papers refer to a number of key relevant plans, policies and strategies;</p> <p>National: WSP, PPW and MIPPS, PPW Companion Guide, TANs, Circulars, Environment Strategy for Wales (2006), Policy Statement for National Parks in Wales (2007), A Winning Mid Wales (2005)</p> <p>Regional: Local Housing Strategies and Local Housing Market Assessments for neighbouring authorities,</p> <p>Local: BBNP Unitary Development Plan, BBNP Management Plan, Community Strategies, BBNPA Joint Housing</p>	<p>Ensure that it is clear how the contextual strategies have influenced the Preferred Strategy, including in particular those of key neighbouring authorities.</p>

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<p>Land Availability Study (2007)</p> <p>The Initial Sustainability Appraisal Report (section 3 & Appendix 2) also contains the review of Relevant Plans & Programmes</p> <p>Relationships: Whilst some references are made to some joint working with neighbouring authorities (e.g. housing apportionment waste, aggregates), the Preferred Strategy document at section 3 gives little indication of Brecon Beacons National Park within the wider region. Key linkages and influences on the Preferred Strategy need to be clarified. (Note that the soundness self assessment in Appendix 5 does not mention issues emanating from the emerging LDP strategies of the 7 authorities which the National Park extends over or the 3 authorities it adjoins.)</p>	<p>Given the unique spatial location of the BBNP due to its overlap with 7 authorities and bordering a further 3 authorities, the plan should provide clear evidence of how the authority has worked with authorities to ensure the Preferred Strategy is compatible. No reference is made of the regional context to neighbouring adopted & emerging development plans. Ensure evidence is provided on the areas of joint working identified both within the authority and external organisations.</p>
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C2 It has regard to national policy.	
<p>Comments</p> <p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2</i></p>	<p>Suggested Actions</p> <p><i>See comments under soundness tests CE1 & CE2</i></p>

C3 It has regard to the Wales Spatial Plan

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<u>Comments</u>	<u>Suggested Actions</u>
<p>Paras 2.12 and 2.13 specifically refer to the framework setting role of the WSP ('08 update). The three spatial areas within which the BBNP is situated are acknowledged; Central Wales; South East (The Capital Network) and Swansea Bay (Waterfront and Western Valleys). The Central Wales strategy is highlighted as the main strategy for the area.</p> <p>The Preferred Strategy appears generally to be consistent with the Wales Spatial Plan vision for the Central Wales area.</p> <p>It is noted in Appendix 5, that 'consideration of more detailed aspects of plans, policies and strategies will be considered during the deposit plan preparation.' It is suggested that it would be useful if the authority could demonstrate the functional linkages that exist between local service centres and clusters of settlements to further enhance the soundness of the plan.</p> <p><i>See also further comments under Soundness Tests CE1 and CE2.</i></p>	<p>It would be useful if the authority could demonstrate the functional linkages that exist between local service centres and clusters of settlements to provide evidence that the plan is sound.</p>

C4 - Has regard to the relevant community strategy/ies.	
<u>Comments</u>	<u>Suggested Actions</u>
<p>Appears to do so; paras 2.18-2.20 identify the National Park Management Plan. The vision has been prepared in the context of the Community Plan.</p>	<p>To note.</p>

<p>CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities</p> <p>&</p> <p>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base</p>	
<u>Comments</u>	<u>Suggested Actions</u>
<p>The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what</p>	

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the **preferred spatial strategy** is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at sections 3 to 8.

While the structure of the preferred strategy document properly reflects the logical flow from context and challenges faced to issue identification, through to vision, objectives, options, to preferred strategy and strategic policies, the text does not always provide clarity about how issues have flowed through and been dealt with at each stage.

- Section 2 summarises the **national, regional and local planning context**, as well as other strategies which form the policy framework that has been used to inform the preferred strategy. It also provides an explanation of the evidence gathering and public engagement undertaken by the authority, and the requirement to undertake a SA/SEA and HRA.
- Section 3 identifies a number of **issues** identified by a) stakeholders and communities, b) SA/SEA c) review of baseline information. The summary of key issues identifies a focused small number of key critical land-use issues for the plan area.
- The LDP **vision** (para 4.4) is extracted from the National Park's Management Plan vision and could benefit from being made more locally distinct. The vision at present is considered to be too generic, lacking spatial context and does not explicitly articulate the unique issues facing the National Park. The vision could be more specific to the area and express how the area will have changed by the end of the plan period.
- A total of 24 LDP **objectives** were developed under 3 headings; 1) National Park purposes, special qualities and potential for growth; 2) Sustainability and climate change and 3) Foster the social and economic well-being of local communities. These relate to the issues identified and are distinct from the SA objectives (ISAR). Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered.
- **Strategy options** (section 5, i.e. 1. Containment, 2. Community vitality, 3. Sustainability and climate change 4. market led growth). Evidence to support the options is extremely limited. It is unclear as to how the options relate to the issues identified in the plan. The settlement hierarchy is very simplistic and it is unclear as to how the 3 different tiers of settlements have been defined. The definition of hubs is reliant on the evidence in the Spatial Plan as no further work has been carried out by the authority. More work is required on the settlement functionality and linkages. The strategy identifies key settlements as the focus for growth, which are indicated

Vision – develop the vision so that it is more spatially specific to the National Park area and identify how the area will change over the plan period.

Consider developing into SMART **objectives** to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.

The deposit plan must be supported and influenced by an appropriate sound evidence base. Further evidence is particularly required in relation to;

The options considered
Infrastructure capacity of key

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<p>as being the most constrained. Infrastructure deficiencies are identified, but not resolved. There is a lack of evidence as to how the constraints are applied. The strategy therefore appears unlikely to deliver based on current information. There is a lack of justification as to why the hybrid strategy has been selected as the preferred option. It is not clear if there are any strategic sites proposed within the plan area.</p> <ul style="list-style-type: none"> - The strategic policies (section 8) Need to provide some supporting text for the policies to be included in the deposit plan to indicate delivery mechanisms and timescales for implementation. - Clarification of how the site assessment process (through the candidate site methodology) will be developed is provided (section 9). The methodology involves a two stage process for sites which were submitted between November 2007 and September 2008. Phase 1 involves a general sift excluding sites submitted in areas of open countryside. The methodology for phase 2 is yet to be developed, but will be assessed against the preferred strategy's key objectives and an SA/SEA assessment. - A monitoring framework should be provided to set out targets and indicators as a basis for assessing the effectiveness of the strategic objectives. It needs to be developed for the deposit plan to provide a monitoring and implementation framework as this is critical in showing how the strategy will be delivered. A developed framework should include strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. - A programme for preparation of SPG (including development briefs and masterplans) should be provided. 	<p>settlements The preferred strategy option Strategic sites</p> <p>Ensure the policies in the deposit plan are supported by information on delivery mechanisms and implementation timescales.</p> <p>Develop a monitoring and implementation framework to ensure it will be satisfactory for measuring the effectiveness of the plan strategy and policies.</p> <p>Provide a programme for the production of SPG</p>
<p>Preferred Strategy - deliverability and flexibility (also see above on Monitoring and Implementation Framework).</p> <p>The strategy identifies key settlements as the focus for growth, which are indicated as being the most constrained. There is a lack of evidence as to how the constraints are applied. Infrastructure deficiencies are identified, but not resolved. The strategy is therefore unlikely to deliver the development identified as necessary to meet the plan's objectives.</p> <p>There needs to be flexibility in the housing and employment land requirements as a response to the current economic climate. The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.</p>	<p>Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage. The deposit LDP will need to develop further the type, scale and location of development required to achieve the strategy. Particularly important will be ensuring that the significant developments identified can be delivered, and providing the timescales that are proposed for this</p>

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	<p>delivery. Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p>
<p>Agricultural land The presented preferred development strategy is consistent with Assembly Government policy towards the conservation of best and most versatile agricultural land (PPW paragraph 2.8.1). There is the potential for best and most versatile agricultural land (BMV) adjoining the potential growth points of Brecon and Crickhowell. The loss of BMV may become an issue should the preferred strategy change during the plan preparation process requiring additional strategic development sites.</p>	<p>Ensure that strategic development sites are located away from high quality agricultural land.</p>
<p>Biodiversity The identification of biodiversity issues as a significant issue is welcomed. Reference to the requirements of the Natural Environment and Rural Communities Act (2006) (NERC Act), in particular the biodiversity duty would support the plan's approach. Implementation will be the key factor determining how well the LDP achieves its aims regarding biodiversity, and detailed site based guidance, possibly through SPG, may be required.</p>	<p>Consider referring to the NERC Act in the deposit plan.</p>
<p>Design The Preferred Strategy makes references to achieving sustainable design.</p>	
<p>Employment The choice of preferred strategy would seem reasonable in principle with Brecon being identified as the 'primary key settlement' and 'spatial hub' for housing and employment (regional employment site at Slwch Hill). However, there is a limited evidence base and few statistics in the Draft Issues Paper on Employment on which to make an informed judgement. The issues paper mainly sets out the existing circumstances and there is no background information to determine future market sectors and their respective spatial implications. It refers to the existing employment and mixed use land allocations from the UDP, but falls short of predicting requirements or developing different scenarios to apply to the LDP's options and preferred strategy. In section 5 of the Issues Paper a series of questions are asked, but no answers are provided. Work is required on how much and where employment is to be linked to housing provision, and if site allocation relates to sustainability. The choice of preferred strategy makes assumptions about all of these already. It is noted that the Issues Paper is to be updated as information becomes available.</p>	<p>The deposit plan and its evidence base should:</p> <ul style="list-style-type: none"> - clarify relationships with neighbour authority employment strategies / allocations; - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - clarify the inter-relationship between housing and employment land allocations within the plan area and

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	with neighbouring plan areas.
<p>Environmental Protection: Water quality, flood risk, landscape and biodiversity Useful background information on water quality, flood risk, landscape and biodiversity is presented both in the Preferred Strategy document, the ISAR and in draft issues papers 1 & 3. However, the local implications of the information need to be fully considered, and more fully addressed whilst working towards the deposit plan. It would be useful to consider the spatial hierarchy of green infrastructure, including networks, corridors, linear and stepping stone features (see PPW 5.4.3) The local implications of these should be highlighted and more fully addressed whilst working towards the deposit plan.</p> <p><u>Policy SP1 National Park Policy</u> This policy reads more like an objective than a policy. The statutory duties of the National Park do not need to be restated in the form of a plan policy (although they will be crucial to the development of the strategy and plan policies, they can be set out elsewhere in the plan).</p> <p><u>Policy SP2 Major Development in the National Park</u> The policy repeats (and slightly rephrases) national policy and is unnecessary. It should therefore be removed.</p> <p><u>Policy SP3 Environmental Protection</u> This policy is very general and it is questioned whether it really adds to national policy in terms of water, flooding, landscape and biodiversity. It is not clear whether this policy addresses the local spatial issues in the National Park.</p>	<p>The deposit plan should:</p> <ul style="list-style-type: none"> - consider the spatial hierarchy of green infrastructure, including networks, corridors, linear and stepping stone features and their local implications - consider the inclusion of a policy to address the spatial element of landscape protection and enhancement using LANDMAP. <p>Ensure that policies do not repeat national planning guidance.</p>

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<p>The local implications of any information on landscape and biodiversity sites and networks need to be fully considered, and links between the evidence and the preferred strategy should be clearly shown, particularly where there are strategic spatial implications. Any conflicts or tensions arising from the implications of such sites and networks should be highlighted at this stage, for fuller investigation while working towards the deposit plan. Although policy SP3 recognises that ecology and biodiversity protection and enhancement is not confined to statutorily designated sites but extends across all the country, it may be possible to identify specific approaches linked to the strategy and its spatial reflection.</p> <p>It would be of value to have a policy in the deposit plan that addresses the spatial element of landscape protection and enhancement. Landscape policies might be of particular importance when linked to tourism in the National Park. If it is intended to introduce special landscape designations under policy SP3, is the evidence base under preparation for these, and what are the spatial implications? LANDMAP is a useful tool for developing landscape-related policies in development plans.</p>	
<p>Gypsy and Travellers No reference is made in the plan to gypsies and travellers. There is no evidence of any assessment of need having been considered which is a statutory requirement. We are aware of a number of gypsy traveller issues within the Park. The deposit plan will need to consider the inclusion of specific policies.</p>	<p>The authority needs to;</p> <ul style="list-style-type: none"> - assess the need to accommodate gypsies and travellers - consider the inclusion of specific policies relating to gypsies and travellers
<p>Housing The Draft Issues Paper on Population & Housing provides background information on population and housing issues in the National Park and calculations of population figures and housing projections.</p> <p>The sub-national apportionment process is accepted by the authority as the starting point for its housing requirement, however it is unclear why the figure of 2,307 is not adopted in the preferred strategy. The adopted housing figure is based on the 2006 projections which are considerably lower at 1,506-1,664, however there is no explanation of the preferred growth level and how this relates to the issues identified in the Park, or what the implications will be. The reasons for this significant difference in projected figures should be explored. The figure is based on an assumption that the average household size will remain at 2.24 over the plan period, however, in calculating the figures for the earlier UDP, it appears an assumption was built in that 'average household size will continue to fall'. There is a concern that the housing provision number may be on the low side.</p> <p>The affordable housing target (548-604 units) is set out in Policy SP6 of the Preferred Strategy and has been derived from constituent local authorities' LHMA as explained in the Issues Paper, although further LHMA appears to be expected. The Issues Paper also refers to a number of Local Needs Surveys, but it is not clear how</p>	<p>The deposit LDP the should:</p> <ul style="list-style-type: none"> - provide robust housing figures which are adequately evidenced; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas; - clarify and evidence that all the options for increasing the affordable housing target have been explored; - clarify the reasons for and viability of the thresholds chosen to deliver affordable housing. - The deposit LDP should provide sufficient clarity on location and

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<p>these have influenced the target. The LDP aims to meet the target range, but no mechanisms for delivering affordable housing have been identified - i.e. thresholds, quotas. It is therefore not possible to assess whether the target is realistic or whether the strategy will deliver affordable housing to those areas where need has been identified. This is particularly important as the affordable housing target seems to represent 36% of the new dwellings for which the Plan aims to provide (policy SP5). There is also no information on how the delivery of the target will be monitored.</p> <p>Although reference is made in the Draft Issues Paper on Population and Housing to MIPPS 01/2006 and TANs 1 and 2, there is no reference to these in the Preferred Strategy and it is unclear whether it has had regard to national policy on housing.</p> <p>Consideration should be given to broad phasing for developing housing and employment land over the plan period.</p> <p>Consideration of potential developer contributions and the economic viability of development sites needs to be considered in relation to impact on aspects of the associated infrastructure, especially on the provision of affordable housing. The deposit LDP should clarify main obligations related to specific allocations.</p> <p>As specific strategic sites for housing have not yet been identified, whether further development at the former Cwrt-y-gollen army camp is appropriate in the context of the selected preferred strategy is not clear. LDP Wales (paragraph 4.3) advises local planning authorities to keep the local context under review. This extends to existing policies and allocations. Development at Cwrt-y-gollen is not allocated in the adopted development plan but was considered at the local public inquiry into the draft unitary development plan. The LDP offers an opportunity to include the site in the assessment process alongside other candidate sites to ensure the strategy is founded on robust and up to date evidence.</p>	<p>deliverability.</p> <ul style="list-style-type: none"> - Explore the potential of seeking developer contributions and the economic viability of development sites. <p>Development at Cwrt-y-gollen would benefit from assessment alongside other candidate sites.</p>
<p>Minerals (Policy SP8)</p> <p>Hard rock resources should be safeguarded in line with Minerals Planning Policy Wales. The RTS states the limestone area between the Taf and the Carmarthenshire border has generally average or high environmental capacity to accommodate future working. Given the limited capacity of the limestone outcrops to the east and west there is a need for this mineral reserve to be safeguarded along with good quality sandstone. A background minerals paper would help to demonstrate how the authority has chosen to implement the safeguarding policy, and arrangements with adjacent authorities who may need to provide additional materials.</p> <p>It is accepted that sites for future extraction of minerals need not be provided for regional needs, there should be consideration of local needs. Consider whether the authority wishes to consider the extraction of building stone to</p>	<p>The deposit plan must:</p> <ul style="list-style-type: none"> - consider the local needs of the national park; - adequately safeguard mineral resources in line with national policy; - identify existing mineral reserves and resources and buffer zones on the proposals map; - clarify whether the NP intends to

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<p>meet local building vernacular as stated on page 73 of the draft BBNP Management Plan 2009.</p> <p>It should be outlined in the plan whether it is the intention of the BBNP to seek further prohibition orders. What are the proposals for restoration for long dormant sites as the policy only refers to 'existing mineral workings'.</p> <p>The location of existing mineral reserves and resources and buffer zones should be referred to and will need to be shown on the proposals map.</p> <p>The plan does not address opportunities for recycled/secondary aggregates in the National Park which the NPA is required to do (see p73 of the draft BBNP Management Plan 2009).</p> <p>Clarification of the word 'inappropriate' in the policy is required.</p>	<ul style="list-style-type: none"> - seek further prohibition orders; - clarify wording in the minerals policy.
<p>Transport</p> <p>It should be examined whether there is sufficient capacity within the existing transport network to accommodate further growth in travel to and within the identified key settlements. Evidence is not clear about the relative accessibility across the plan area, which in turn would inform the location of growth and reduce the need to travel.</p>	<p>The deposit plan should provide evidence on;</p> <ul style="list-style-type: none"> - the capacity of existing infrastructure to accommodate growth in the key settlements - the accessibility of key settlements and growth areas by different modes of transport
<p>Retailing and Town Centres</p> <p>The issues paper mainly sets out the existing circumstances and raises questions that will need to be answered such as whether a retail hierarchy needs to be established, and whether there is a need for additional retail space.</p>	<p>The deposit plan and its evidence base should provide clarity about the retail hierarchy, and floorspace.</p>
<p>Sustainable Development (Policy SP11)</p> <p>Generally content with the approach in part a) that cross-refers to the 'Guidance for Sustainable Design in the National Parks in Wales' (2008) provided that the guide does not contain policy required to determine the principle of development. Such policy would need to be placed in the LDP.</p> <p>The Preferred Strategy does not provide any evidence on part b) of Policy SP11 'Sustainable Development' as it relates to a percentage requirement from a renewable resource. The authority should also consider widening the scope of the contribution to include low carbon energy sources within the percentage as a means of mitigating climate change.</p>	<p>Check that the 'Guidance for Sustainable Design in the National Parks in Wales' does not contain policy that is more appropriately located in the LDP.</p> <p>Ensure clarity in the deposit plan about renewable energy.</p>

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<p>Waste (Policy SP7) Whilst the NPA is not expected to allocate sites for regional facilities, the commitment to provide for local facilities is also important within the overall regional and national context for waste planning and this should be recognised in the Preferred Strategy. A waste background paper should be prepared for the deposit stage to contain useful evidence/information and consider the need for local facilities based on pro-rata of the population of the Park. Exactly what facilities are needed and where they could potentially be located needs to be discussed with the local waste management authorities to ensure a co-ordinated approach to waste planning can be implemented.</p>	<p>Ensure the Deposit plan has examined the need to provide local facilities for waste. Examine the requirements and locations for local facilities in the National Park.</p>
<p>Water and flooding Some useful additional sources to draw upon for flood risk and water issues are the relevant draft Catchment Flood Management Plan(s), a draft River Basin Management Plan(s) (available from the Environment Agency).</p> <p>The Preferred Strategy objective of locating all development away from flood risk is supported. Deposit plan allocations and policies should also be in line with the TAN 15 strategy of directing development away from the floodplain. If allocations in zone C are proposed, the requirements of section 10 of TAN 15 will need to be considered.</p> <p>Draft issues paper 3 (strategic development options) states that some settlements are nearing environmental capacity in terms of "potential visual impact caused by further development" and highlights that this combined with flood risk zones in the primary/key settlements represents a significant constraint. Policy SP10 Sustainable Distribution of Development aims to provide a level of growth in the primary and key settlements "which is compatible with the environmental capacity" of the towns. The fact that the chosen settlements are identified as having little capacity to deliver development appears to undermine the Preferred Strategy, which relies on the primary/key settlements as development hubs. This is a significant issue that must be addressed and evidenced. For example, evidence should be provided to support the statement that the primary/key settlements are at or near capacity on visual impact and flood risk grounds. If this is the case, then the strategy will need to make adequate provision for the required development elsewhere.</p> <p>Whilst evidence has been collected in regard to flood risk, it is not clear that this has shaped thinking on the focus of development on primary/key settlements in the Preferred Strategy.</p>	<p>The deposit plan must provide sufficient evidence on the capacity of primary and key settlements to accommodate further growth.</p>
<p>Water infrastructure The strategy highlights a lack of infrastructure capacity and river abstraction capacity as issues for the plan. National planning policy states that spatial choices should be based on, and influenced by, evidence of capacity and ability for delivery. If the provision of water/sewerage infrastructure is required, the measures needed and where, how and when they could be secured should be identified in the deposit plan. It would be useful to</p>	<p>Ensure adequate evidence is provided at deposit stage in relation to infrastructure capacity. It is advised that you engage with Dwr Cymru.</p>

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consider: current capacity, implications of public investment programmes, co-ordination of any improvement works, the need for phasing, and any other relevant delivery issues. Although it is unnecessary to reiterate national policy, the local implications of how infrastructure and resource capacity and provision impact on the preferred strategy and its delivery should be clearly outlined.	
Welsh Language Conserving and enhancing the cultural heritage and Welsh language is identified as an objective (p24).	

CE 3 There are clear mechanisms for implementation and monitoring	
Comments	Suggested Actions
A monitoring framework has not been set up. The monitoring framework should set out targets and indicators as a basis for assessing the effectiveness of the strategic objectives.	Set up a monitoring and implementation framework to measure the effectiveness of the plan strategy and policies. (+ see LDP Manual para 9.5)

CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	Suggested Actions
Until the monitoring arrangements are specified it is difficult to assess how responsive the plan might be to changing circumstances. Monitoring evidence should help inform or initiate future amendments or reviews.	Ensure that the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic take up and other changes.