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Eich cyf : Your ref: Representor No:
Ein cyf : Our ref qA1220251

19 July 2017

Dear Ms Dunne,

Pembrokeshire Coast National Park Authority – Preferred Strategy 1st Review – Regulation 15 Consultation: Welsh Government Response

Thank you for consulting the Welsh Government regarding the Pembrokeshire Coast National Park Authority Local Development Plan (LDP) – 1st Review pre-deposit documents. It is essential the Authority is covered by an up-to-date LDP that will deliver the vision and key objectives and give certainty to local communities and investors.

Without prejudice to the Ministers discretion to intervene later in the process and to the independent examination, the Welsh Government is committed to helping Local Planning Authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of document preparation. The Welsh Government looks for clear evidence that the tests of soundness (as set out in the 'LDP Manual') are addressed.

The Welsh Government is broadly supportive of the Preferred Strategy, which seeks to direct development to the most sustainable centres whilst supporting rural communities. In addition, we generally support the level of growth proposed in the plan, although this will need to be clearly informed by a range of growth options stemming from the issues your Authority is seeking to address.

Having considered all the submitted documents provided by Pembrokeshire Coast National Park Authority, **our main concern relates to the candidate site selection process**, which appears to identify future allocations based on their ability to deliver affordable homes alone against untested affordable housing targets. If this is the case, your Authority needs to robustly justify the Candidate Site selection process and explain how the proposed allocations have been assessed against general sustainability and viability criteria, which has subsequently informed the plans strategy. The integrity of this approach and how it could withstand changing circumstances as the plan moves forward, for example, changes in affordable housing viability, should be a key consideration to ensure a robust evidence base.

The Environment (Wales) Act 2016 sets out a legislative framework for the sustainable management of natural resources (SMNR) with provisions for public bodies to contribute to achieving SMNR; to maintain and enhance the resilience of ecosystems and the benefits they provide.

The Preferred Strategy should set out a 'direction of travel' on how the plan will aim to improve and not reduce biodiversity and further the resilience of ecosystems. Currently, the Preferred Strategy does not sufficiently reflect the Environment Act and it does not present a policy response to further the resilience of ecosystems. We are more than happy to meet and assist in appropriate policy development for the Deposit Plan.

Our representation also includes **other concerns** which are set out in detail in the annex to this letter. Collectively our comments highlight a range of issues that in our opinion need to be addressed if the plan is to be considered 'sound'. We have indicated where evidence of soundness is not immediately clear and where the evidence base can be improved and/or strengthened going forward. Some key areas include:

- Spatial distribution
- Growth options and housing provision
- Affordable housing targets and site thresholds
- Agricultural land
- Minerals
- Renewable energy, and
- Green wedges.

We strongly advise these matters are addressed in order to maximise the potential of your LDP being considered 'sound' at the Deposit stage.

As always, we would urge you to seek your own legal advice to ensure that you have met all the procedural requirements, including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) as responsibility for these matters rests with your Authority.

If you would like **to meet at an early date** to discuss any matters arising from our formal response to your Preferred Strategy, then please contact me. You should document your response to our comments in your Consultation Report.

Yours sincerely,



Mr Mark Newey
Head of Plans Branch
Planning Division

Annex to Welsh Government Letter 19th July 2017 in response to Pembrokeshire Coast National Park – Preferred Strategy – 1st Review

Review Report

In accordance with Regulation 41 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended), we note the Authority has undertaken a full review of its adopted Local Development Plan (LDP). The Review Report **concludes that a full revision of the plan is required.**

Neighbouring Authorities

The Park has set out detailed justification in the Review Report explaining why it would not be appropriate to undertake a joint plan with Pembrokeshire County Council. The Authority has highlighted issues of timing, cost and the need to demonstrate a 5-year housing land supply to explain undertaking their replacement LDP without the County Council whilst continuing further joint working on the evidence base. It is important the Authority provides evidence of this collaborative working (where appropriate) on key issues to ensure a robust evidence base.

Spatial Strategy

All aspects of sustainable development should be taken into account when determining the scale and location of growth. This includes economic, social and environmental factors, supported by the Sustainability Appraisal/Strategic Environmental Assessment. The deposit plan should be clear how the spatial strategy will deliver the Authority's key objectives and state any assumptions and the relationship to the strategy and objectives of the plan.

The preferred spatial option is to maintain the strategy in the adopted LDP with two additional tiers in Rural Centres (Tier 4) and the Countryside (Tier 5). The 'Focused Key Settlement' strategy is predicated on the Wales Spatial Plan Pembrokeshire Haven Settlement Framework and is considered by the Authority to direct development to the most sustainable Service and Local Centres in Tiers 2 and 3 of the hierarchy, whilst sustaining rural communities in Tiers 4 and 5. **The Welsh Government supports the ethos of this strategy (subject to the below comments) in line with the principles of sustainable development as set out in national planning policy.**

Rural Centres (Tier 4):

We note from Table 6 (LDP, page 119) that 34% of growth is proposed in Tier 4. The role and function of settlements and capacity to accommodate new housing development (LUC, update March 2017) has been a key consideration in the identification of 33 new Tier 4 Rural Centres in Nevern, Stackpole, Lydstep and Rosebush. Some of the Rural Centres have no accessibility other than by private car (Sustainable Transport Paper) with the settlement form often very small and linear, for example in Pontfaen and Nevern. National policy sets out the sustainability principles that should be considered when locating new development, including good accessibility on foot, by bicycle and public transport (PPW, 4.7). To deliver on the issues the plan is seeking to address, the Deposit plan should ensure **all Rural Centres identified for housing and employment growth in Policy 6 can be justified in line with national policy.** The Authority should explain how development can be controlled in these settlements. Will all Centres have settlement boundaries? The Authority should explain if the use of settlement boundaries for all Rural Centres is appropriate in line with TAN 6 (paragraph 2.2.4).

Countryside (Tier 5):

In the countryside, Policy 7 permits infilling and rounding-off of up to 2 market houses in isolated groups of dwellings. The Welsh Government does not object with the principle of this approach, however, the Deposit plan should be clear that **new homes in the countryside (Tier 5) will**

require special justification in the first instance, such as affordable housing to meet local need or rural enterprise dwellings. For example, why is the Authority allowing market housing in the first instance and not looking for affordable housing as PPW (paragraph 9.3.2) suggests? This is pertinent to the plan as the delivery of affordable housing is a key element of the strategy.

Growth Options and Housing Provision

Planning Policy Wales (paragraph 9.2.2) states that Authorities will need to have a clear understanding of the factors influencing housing requirements in their area over the plan period. The latest Welsh Government household projections and the Local Housing Market Assessment (LHMA) should form part of the plans evidence base together with other key issues the plan is seeking to address. For the Park, the Welsh Government 2013-based household projections, released March 2016, are the most recent.

The Preferred Strategy identifies two options for housing growth; Option 1 is understood to be the Welsh Government 2013-based principle household projections and Option 2 is a policy based on providing market housing to subsidise the provision of affordable housing. **The options tested to inform the level of population and housing growth are unclear in their relationship to the projections and limited when considered against the range of issues the plan is seeking to address**, such as population decline, levels of out-migration and an ageing population. The Deposit plan should ensure a range of options have been tested to robustly inform future levels of growth linked to key issues the plan is seeking to address rather than become a mathematical calculation based on past build rates only.

Preferred Option 2 is a continuation of policy in the adopted LDP and seeks to tackle the high level of affordable housing need in the National Park (LHMA, 2014). Option 2 will result in a requirement of 940 dwellings with a provision of 1100 units, which is approximately 500 units less than the adopted LDP. The housing requirement is predicated on past 10-year build rates (2005-2015) delivering an average of 60 units per annum (60 units p/a x 16 year plan period = 960 unit requirement). Whilst the Welsh Government does not object to the principle of this approach, the Authority has acknowledged that future build rates are likely to exceed past completions with 70 units per annum considered achievable in principle (LDP, paragraph 4.268). This increased build rate would raise the housing requirement by approximately 160 units to 1120 dwellings. The Authority should **clearly evidence the level of housing requirement in the Deposit plan, which is not only deliverable but also takes account of the key issues the plan is seeking to address, in particular maximising the delivery of affordable housing.**

Housing Components

Flexibility / Discount Allowance:

Policy 44 Housing proposes a provision of 1100 units, which includes a 10% flexibility allowance to account for the non-delivery of sites. This has been balanced against the landscape sensitivities of allocating additional land in the National Park (Housing Background Paper, 2017). However, the flexibility element is unclear in Policy 44, as reference is made to an additional 'contingency to be added' to the provision? Whilst we support the inclusion of a flexibility allowance, it is for the Authority to evidence the level of flexibility in the plan. Similarly, the non-delivery allowance of 40% in Tenby and 25% to landbank totals will need to be robustly justified, including any impact on the strategy and/or spatial distribution.

Affordable Housing

Affordable Housing Need - Local Housing Market Assessment:

One of the key issues for plan revision is the delivery of affordable housing, which fell significantly short of targets in the adopted LDP. Whilst the Authority refers to the 2014 Local Housing Market Assessment (LHMA) which indicates a need for 370 (largely social rented) properties per annum,

no LHMA has been included in the evidence base to inform the scale and location of growth in the Preferred Strategy.

Policy 45 Affordable Housing, refers to a target of approximately 250 affordable homes, which is around 22% of overall housing provision. There is no supporting evidence to illustrate how this figure has been derived or how it relates to plan provision. In this instance, the Deposit plan should:

- Explain how the LHMA has informed the spatial strategy to maximise the delivery of affordable housing, and
- Include an indication of the overall level of affordable housing need including any backlog.

Affordable Housing Targets:

A broad-level viability assessment submitted as part of the evidence base has informed the affordable housing targets in Table 8 of the Preferred Strategy. The Authority has assessed Candidate Sites for potential allocation in the Deposit plan by applying a minimum threshold of 5 or more units (in Tenby) that can deliver at least 2 affordable homes on-site (LDP, paragraph 4.292). The Authority should clarify if Candidate Sites have been assessed and selected against untested affordable housing targets in the Viability Assessment? If this is the case, the **Welsh Government would have significant concerns regarding the site selection process, particularly if affordable housing targets were to shift based on potential updates evidence in the Deposit plan.** Would this mean that different sites could have been chosen or excluded from the outset? For example, if the affordable housing target was to increase to 25% in the South West Coast then candidate sites of 8 units could deliver 2 affordable homes instead of 10 units (at 20% target). Conversely, if targets dropped to 15% in the South West, would 7 unit sites that could deliver 1 affordable unit be excluded from allocation in the plan? This is particularly relevant in the South West as unlike other housing market areas there is no 'headroom' above benchmark land value (Affordable Housing Study, Table 5.1). **The Authority will need to explain and robustly justify its approach to candidate site selection.** The Authority needs to make certain that housing allocations in the Deposit LDP have been assessed against general sustainability and viability criteria in the first instance in order that suitable sites are not disregarded or included unfairly from the outset.

Affordable Housing Threshold:

Planning Authorities should include site thresholds for residential development above which a proportion of affordable housing will be sought (PPW, paragraph 9.2.17). The threshold will apply to both allocated and windfall sites in the plan, below which commuted sums may be sought. As worded, Policy 45 does not include a threshold other than a site specific target for 2 affordable units, it should do. The Deposit plan should clarify the site threshold and its implication for affordable housing delivery on sites across the plan area.

Prioritisation of Affordable Housing:

Policy 37 and 43 in the Preferred Strategy seek to prioritise the provision of affordable housing over new self-catering accommodation and alternative uses on redundant employment sites in Centres and countryside locations. The purpose of the policies is unclear given that the principle of residential development is generally acceptable in settlement boundaries. How would this policy be implemented in practice? On this basis, would any sites be considered suitable for self-catering accommodation inside settlement boundaries? How does this align with the Authority's tourism strategy?

Gypsy and Travellers

The Housing Background Paper highlights that in accordance with the provisions of the Housing (Wales) Act 2014, a Gypsy Traveller Accommodation Assessment (GTAA) has been undertaken for the whole of Pembrokeshire including the National Park, yet **no GTAA has been included in the evidence base to inform any identified or future need over the plan period.** The aforementioned paper notes the GTAA projects an unmet need across the whole of Pembrokeshire for 32 pitches, plus 2 Travelling Showpeople's yards over the first 5-years of the plan period (2015-2020). This would result in a total need for 101 pitches across Pembrokeshire up to 2031. The need is grouped into three geographical areas; Haverfordwest, Pembroke/Pembroke Dock and Kilgetty, which reflects the location of the two larger sites in the County Council. Whilst we note these areas lie predominately outside the National Park, **the Authority should clarify if there is an element of unmet need for Gypsy and Traveller accommodation in the Park?** The duty to meet any assessed need is outlined in Section 103 of the Housing (Wales) Act 2014. National policy also states that "where there is an assessment of unmet need...local planning authorities should allocate sufficient sites to ensure the identified pitch requirements can be met" (Circular 30/2007). The Authority should ensure any unmet need is identified through the provision of appropriate sites in the Deposit plan.

Policy 46 Gypsy and Traveller Sites:

The Welsh Government supports the inclusion of criteria based Policy 46 to assess any proposals for new Gypsy and Traveller sites. However, Criterion A does not accord with Welsh Government Circular 30/2007 and should be considered for deletion in the Deposit Plan. Annex B in the Circular notes that policy requirements to demonstrate 'evidence of need' would act against freedom of movement for Gypsies and Travellers who may wish to develop their own sites. Such restrictions would not be placed on non-Gypsies and Travellers.

Employment

Employment in the National Park is strongly based on the tourism industry, with the largest employment sectors falling outside the traditional B-use classes (Employment Background Paper). The Authority has highlighted in the Preferred Strategy (paragraph 4.2.2) that employment allocations in the adopted plan have not been developed due to viability concerns and a lack of developer interest, with most enquiries directed to the County Council at Milford Haven, Pembroke Dock and Haverfordwest. To avoid frustrating land for alternative uses and accommodating specialist market requirements, **the Welsh Government supports the Authority adopting a more flexible approach through criteria-based policies** to promote small scale employment opportunities in Centres and the countryside.

As worded, the employment policies are in broad alignment with national policy. In the Deposit plan, the Authority should:

- Include criteria based policies to assess applications for employment opportunities in both urban and rural areas;
- Include a criteria based policy to promote and assess the expansion of established businesses in rural areas, and
- Consider a safeguarding policy that identifies and lists any established employment sites for retention for employment purposes.

Retail

The spatial strategy sets out the vision for the retail functions within Tenby, the Local Centres of Newport, Saundersfoot and St David's and the Rural Centres. The South West Wales Regional Retail Study (February 2017) identified the retail market in the Tier 2 and 3 centres to be strong with low vacancy rates. As a result, the study forecasts a need for new retail floor space for

comparison goods in these centres. **The Authority should explain how they will address the findings of the study.**

Policy 49 Retail in the National Park:

Policy 49 sets out the Park's retail hierarchy which is in-line with the Wales Spatial Plan and the LDP spatial strategy. To add clarity, Criterion C 'other smaller retail centres' should be clearly defined in the Deposit plan and on the proposals map so the centres in the retail hierarchy are clear to plan users, for example, does it apply to all Tier 4 settlements or just Solva?

Delivery & Phasing

The Authority will need to demonstrate in the Deposit plan that all allocations and commitments are financially viable and deliverable over the plan period. We note the Authority's intention to prepare a Land Allocation Implementation Study (LDP, paragraph 4.299) to evidence the delivery of sites, key infrastructure requirements and associated costs and build on the work already undertaken to evidence delivery of Local Transport and other long term schemes (Sustainable Transport Paper, Tables 1 and 2). The study will also need to be accompanied by **an indication of key timings, phasing and funding mechanisms to ensure that all allocations and related infrastructure can be delivered over the plan period.**

The Scale and Location of Growth Background Paper (Appendix 2) highlights a number of sewerage and water capacity issues in Tier 3 and 4 Centres. The delivery of allocations in these Centres, which may require upgrades to the network, will need to be clearly evidenced. In this respect, the Authority should consider entering into a Statement of Common Ground (SoCG) with Welsh Water to address the capability of water and sewerage infrastructure to accommodate the level of growth proposed in the plan.

The Housing Background Paper (page 22) appears to imply that housing and mixed-use sites will be phased over the plan period to take account of infrastructure requirements and the absorption of development into existing settlements? The Authority should clarify this approach. National policy is clear that phasing should take the form of a broad indication of timescales rather than an arbitrary numerical limit on permissions on a precise order of release (PPW, paragraph 2.2.1). **Any rationale for potentially controlling the phasing of sites would need to be clearly justified**, particularly as the Authority has not maintained a five-year housing land supply over recent years.

The Authority's intention to prepare a housing trajectory for the Deposit plan will greatly assist all parties to understand the ability of sites to be delivered over the plan period. The trajectory should be supported by an analysis and understanding of lead-in times for larger sites, the inter-relationship between any such sites, potential constraints, costs, infrastructure requirements and funding streams, together with robust assumptions on windfall sites in order **to demonstrate a five-year housing land supply from adoption of the plan.**

Community Infrastructure Levy (CIL) and Planning Obligations

The Authority intends to fund related infrastructure through planning obligations and keep under review the implications of introducing a Community Infrastructure Levy (CIL). With the prioritisation of affordable housing in residential schemes (LDP, paragraph 4.323), the Deposit plan should be clear on this and other prioritised areas in Policy 48 so that contributions can be sought. This will inform the provision of infrastructure/mitigation and avoid sites becoming unviable.

Tourism

The visitor strategy for the National Park is to attract an optimal number of tourists all year round whilst ensuring the environment of the Park continues to hold its attraction. The Authority intends to achieve this by not adding substantively to the overall provision of visitor accommodation (LDP, paragraph 4.187) yet conversely identifies demand for new hotels, guest houses, chalet, caravan and camping sites? (LDP, paragraphs 4.195/4.204). **The Authority should clarify their approach to the visitor economy and clearly evidence demand over the plan period.**

A capacity assessment of existing Landscape Character Areas (LCA) to accommodate future growth for chalet, caravan and camping sites has identified limited opportunities in some and the need to retain restraint in others (LDP, paragraph 4.205). To locate development in the most sustainable places, the Authority may wish to identify LCA with growth opportunities in Policy 38A, where appropriate. Moreover, the Plan could usefully include a separate criterion based policy to support new build development and conversion opportunities for hotels and guest houses (LDP, paragraph 4.195).

One Planet Development

The Welsh Government is generally supportive of local Policy 47 One Planet Development, which needs to be considered against the requirements of national planning policy (PPW, 9.3.11-9.3.12). As worded, Policy 47 could usefully benefit from further clarification in the reasoned justification, for example, in criterion c) what opportunities exist to reuse buildings? Would this include existing dwellings and/or conversions? Would the cost of a conversion make this option 'impractical'? It is important the policy is capable of clear implementation and explanation in the reasoned justification.

Flooding

The Authority should **provide clear evidence on how national flood policy has been considered in the Preferred Strategy and its impact on the site selection process.** The Deposit plan must ensure it accords with national policy, principally TAN 15 Development and Flood Risk, which clearly states that highly vulnerable development and emergency services should not be allocated in Zone C2. Policy 34 Flooding and Coastal Inundation could usefully be strengthened in this respect with reference to the 'Welsh Government's Development Advice Maps' (Criterion A) deleted in-line with the CPO letter dated 27 March 2017.

Coastal Management:

National Planning Policy (PPW, paragraph 5.6.3) states that authorities "should clearly establish what the coast means for them and develop, or apply, specific policies which reflect the characteristics of their coastline". We note the proposals map will identify Coastal Change Management Areas considered unsuitable for development. This is supported by Policy 34A and the two shoreline management plans for Pembrokeshire. The Deposit plan should ensure allocated sites are appropriate in-line with local and national policy, which recognises the undeveloped coast will rarely be the most appropriate location for development (PPW, paragraph 5.7.2).

Agricultural Land

The Candidate Site Assessment Methodology (Appendix D) distinguishes between agricultural land grades 1, 2 and 3a. This approach is contrary to national policy, which identifies all three grades as the best and most versatile (BMV) land and should be conserved as a finite resource for the future (PPW, paragraph 4.10.1). In the Deposit plan, **the Authority should evidence the allocation of any sites on grades 1, 2 and 3a BMV land and demonstrate that any loss is minimised and fully justified.** We advise that in accordance with TAN 6 (Annex B), the Authority

contact the Environment Division in Welsh Government for information on the quality of agricultural land and location of BMV areas in the Park.

Minerals

Planning Policy Wales (14.3.2) clearly states that minerals development should not take place in National Parks, unless in exceptional circumstances. However, the importance of safeguarding mineral resources in the National Park is still recognised. The National Park is combined with Pembrokeshire for the maintenance of a 10 year landbank for crushed rock reserves, of which there is a surplus of 14mt, so no further allocations are required. The requirement for a 7 year land won sand and gravel landbank is shared between Pembrokeshire, Carmarthenshire and Ceredigion, of which there is a shortfall of 2.94mt. Whilst national policy states that landbanks are not required to be maintained within National Parks, it would be beneficial if **the Authority could clarify whether the shortfall of sand and gravel has already been addressed across the region?** It would appear from the Minerals Background Paper (paragraph 46) that the landbank has been maintained in Ceredigion. It would be helpful if the authority could clarify this and any implications for the Park?

Policy 21 Minerals Safeguarding:

In the Deposit Plan, the first paragraph of Policy 21 should be amended to remove reference to 'reserves' and replace with 'resources' in line with national policy. Clarification is also required on the need to demonstrate 'there is no suitable alternative' before development, which would otherwise sterilise a mineral resource if permitted?

Policy 22 Buffer Zones:

As currently worded, Policy 22 would benefit from additional clarity in the Deposit Plan. A list of active and inactive sites in the Park and the types of development that would or would not be acceptable within the buffer zone could usefully be included in the policy.

Policy 26 Inactive Mineral Sites:

In the Deposit Plan, Policy 26 would benefit from the identification of inactive and dormant sites, together with a strategy to explain future restoration and proposals for after-use of the land. The Authority should also identify where future Prohibition Orders may be served in-line with national planning policy (PPW, paragraph 14.7.14).

In summary, the Deposit plan should:

- Clearly set out the broad strategy for mineral working over the plan period, providing narrative on the existing mineral workings within the national park;
- Safeguard mineral resources in line with national policy and the BGS Safeguarding Map of Wales to maintain consistency across boundaries with neighbouring Authorities;
- Include buffer zones around permitted and proposed mineral workings, supported by policy;
- Consider the inclusion of a suitable local minerals working policy to ensure the environmental, amenity and health impacts of any future applications which may come forward during the life of the plan are appropriately assessed;
- Set a clear strategy for dormant mineral sites and provide clarification on serving prohibition orders;
- Show areas of past, present or possible future coal workings on the proposals map and develop a supporting policy (as stated in the background paper);
- Encourage prudent use of natural resources and promote the use of recycled, secondary aggregates or waste materials to reduce primary resources extracted, and
- If applicable, demonstrate the rationale for employment sites and allocated housing within mineral safeguarding areas. The Authority should demonstrate the application of Policy 21 to housing and employment sites in safeguarding areas and evidence that

prior extraction has been considered in-line with national planning policy (PPW, paragraph 14.2.1).

Waste

The LDP strategy to provide local scale waste facilities that would predominately serve the National Park is considered appropriate in-line with national policy. Policy 27 Local Waste Management Facilities provides a framework against which such applications will be assessed.

The Deposit plan should:

- Identify any established employment sites and assess their suitability to meet waste requirements (TAN 21, paragraph 3.21);
- Include a requirement in Policy 27 for the submission of a Waste Planning Assessment to be submitted with applications for a waste management facility classified as a disposal, recovery or recycling facility (TAN 21, paragraph 4.2).

Renewable Energy

The Welsh Government notes the Authority's updated evidence 'Development of a Renewable Energy Assessment and Target Information', which takes account of the Welsh Government's Toolkit for Planners (2015). It will be for the Authority to build on this work going forward, explaining how the renewable energy policy approach has been developed in-line with PPW and the Toolkit taking into account all relevant issues and, where appropriate, making evidence based decisions where the toolkit facilitates this approach.

The Welsh Government considers the evidence base and policy approach would benefit from clarification/refinement in the following areas:

- Demonstrate **how the REA has been embedded in the candidate site process** and how renewable energy/low carbon opportunities have informed the scale and location of growth.
- The REA update assesses the opportunities and potential for renewable energy in the Park and draws conclusions on the potential contribution each renewable technology can make over the plan period. This work should be embedded in the LDP and delivery of the contribution should be included in the monitoring framework.
- **Policy 33 would benefit from some amendment and clarification in order to align with national policy, the evidence base, and ensure the plan will achieve what it intends to in respect of renewable energy.** In particular, clarification is required on the scale of renewable energy technology listed in Table 1. The size of micro to large scale technologies in the Park appears at odds with national policy (PPW, figure 12.2), which clearly defines Local Authority-wide scale as between 5MW and 25MW for onshore wind and between 5MW and 50MW for all other technologies. It may be appropriate for finer grain detail in this respect in light of local circumstances; however, in the first instance it should be clear how these local thresholds relate to those in PPW.
- Policy 33 contains no specific thresholds for development. It should do, and they should align to national policy (PPW 12.2) and the conclusions of the REA.
- In Policy 33 the Authority should also consider whether specific technologies and their impacts may warrant explicit reference, for example, is the wider policy framework and supporting SPG sufficient in this respect?

Natural Environment

As currently worded, Policy 10 provides criteria on development likely to affect local designations, such as Local Nature Reserves and Regionally Important Geodiversity Sites (RIGS). In addition to local designations, planning policy requires that LDPs identify all international and national

designations, including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and listed Ramsar sites (PPW, paragraph 5.4.5). To align with national policy, the Deposit plan should identify any such designations in Policy 10 (where appropriate) and provide criteria against which development will be assessed that is proportionate to the level of designation being considered.

Green Wedges:

The Authority has applied its green wedge self-assessment criteria to 94 potential sites, which has reduced the number of proposed areas to 43 (Green Wedge Review, Appendix A). Whilst the Assessment has considered the protection afforded by normal planning and development management policies (PPW, paragraph 4.8.11), the **Welsh Government has concerns on the excessive number and scale of green wedges proposed in the Deposit plan. All green wedges will need to be robustly justified.** How has the identification of green wedges informed the scale and location of growth, particularly in more sustainable settlements? Why is there a need for green wedges in these locations? Please see our previous comments on Tier 4 Centres.

Open Space:

The Authority updated their Open Space Assessment in 2016, which reviewed existing open space and sought to identify any deficiencies by applying the Fields in Trust 'Benchmark Standard' (CL-02-11). Whilst the Open Space Assessment (2016) has not been included in the evidence base, the Open Space Background Paper has highlighted deficiencies in most Centres across the National Park (Appendix B). National policy states that LDPs should contain policies for the provision, protection and enhancement of open space and set standards so that deficiencies can be identified and met through the planning process (PPW, paragraph 11.2.2). In the Deposit plan, Policy 16 should be amended accordingly with any requirement for open space being factored into viability assessment/S106 contribution assumptions.

Welsh Language

Policy 12 Development in Welsh Language Sensitive Areas will 'normally' apply to Community and Town Council areas with 30% or more Welsh speaking population. What does normally mean? The Authority acknowledges that "where Community Council averages do not reflect the existence of concentrations.....a more qualified and sensitive measurement will be required" (LDP, paragraph 4.77). Clarification is required on this approach. Do Community Council areas align with the settlements in the plan? In essence it should be clear as to where Policy 12 will apply. Policy 12, and the proposals map, should clearly identify Welsh language sensitive areas, ensuring consistency with neighbouring plan areas, where appropriate.

Supplementary Planning Guidance (SPG)

The preparation and timing of SPG should be linked to the monitoring framework (where applicable), with key guidance available at the Deposit plan stage. SPG adopted under the current plan should be reviewed or updated to ensure it's alignment with the replacement LDP.

Monitoring

The monitoring framework should include appropriate targets and key triggers so that action can be taken in advance of the statutory 4-year review if key policies that are fundamental to the delivery of the strategy are not being successfully implemented. Any amendment to policies in adopted plans will need to be considered in accordance with Regulation 41 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended).

When the Deposit plan is prepared, a large number of LDPs will have gone through the examination process and been successfully adopted. This will provide good practice examples, which the Authority may benefit from to build on the effectiveness of the proposed framework in Chapter 5.