

Socio-economic Evidence Report

Supporting Joint SPG: Enabling Sustainable Development in the Welsh National Parks

Prepared by LUC in association with Geo and Co Ltd

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**Project Title**: Joint Supplementary Planning Guidance:Enabling Sustainable Development in the Welsh National Parks

**Client**:Pembrokeshire Coast National Park, Brecon Beacons National Park and Snowdonia National Park

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# Introduction

* 1. The Welsh Government published a study in 2012[[1]](#footnote-1) to assess the effectiveness of planning service delivery in statutory designated landscapes including National Parks. The study involved a review of planning service delivery under different models in the statutory designated landscapes of Wales, England and Scotland, detailed comparative analysis of planning service delivery in statutory designated landscapes in Wales and stakeholder workshops to discuss findings. It identified examples of good practice, key barriers to planning services, analysed them and distilled the findings into a series of recommendations for improvements. In particular, the study made the following two recommendations:
* **Recommendation 6:** Planning within statutory designated landscapes should be informed by a sound evidence base relating to the socioeconomic needs of the area and its landscape character.
* **Recommendation 7:** National Park Authorities (NPAs) should prepare a Sustainable Development Strategy which is subsequently adopted as SPG.
  1. This document represents the evidence base described in recommendation 6, and the Sustainable Development SPG which it informs represents the cross-boundary document described in recommendation 7.

## The role of the Evidence Report

* 1. Through further discussions with the National Parks the role of the evidence report supporting the joint Sustainable Development SPG has been refined to include the following:
* The chain of research leading to the SPG.
* The positive role of the planning system in delivering a range of developments in the Parks.
* Suggestions for policy changes which future reviews of Local Development Plans (LDPs) can address, for example unnecessary inconsistencies in policy and decision-making between the Parks.

## The role of Joint Supplementary Planning Guidance (SPG)

* 1. The SPG which this evidence report informs provides additional detail on how existing policies in the LDPs of the Welsh National Parks should be interpreted and applied in practice by development managers, architects and planners. In so doing, it seeks to pre-empt many of the planning issues which are perceived to constrain development or which can result in delays and additional costs after applications have been submitted for determination. Without a Sustainable Development SPG the NPAs (NPAs) run the risk of preserving a less efficient, more rigid and reactive development management system within which it is harder to secure a sustainable future for the National Parks.
  2. Using existing planning policy as a basis for elaboration, the SPG clarifies the type, siting, scaling and design of development considered to be most sustainable and provides signposts to relevant planning policies and to good practice guidance.
  3. Shared and communicated by the three NPAs, the Joint SPG on sustainable development will help to ensure:
* Proactive identification and promotion of the types of development that the Welsh NPAs wish to see come forward and can permit.
* Support for positive, focussed discussions on spatial planning and development management between planners, developers and communities.

# Planning in the National Parks

* 1. This section sets out the planning context for the Sustainable Development SPG. It summarises information on the role of National Parks in relation to sustainable development, the role of the planning system in the National Parks and perceived barriers to development associated with that system, and the role of Natural Resources Wales.

## The National Parks and sustainable development

* 1. Since the designations of the Welsh National Parks there have been a number of important studies whose conclusions provide context and contribute to the evidence base for the Sustainable Development SPG.
  2. In 1974, Lord Sandford’s review of National Park Policy noted that the agricultural and environmental objectives of National Parks are not always in harmony. The review concluded that in cases of conflict between the Park’s statutory purposes, their first statutory purpose to conserve and enhance the natural environment must take precedence over their second purpose, to promote opportunities for the enjoyment of their special qualities.
  3. In 1991, the ‘Edwards’ review, Fit for the Future, concluded that the commitment to National Parks’ purposes was often lacking at every level of governance, from national government to local community. The same review noted the rise of environmentalism and proposed amendments to the National Park purposes, introducing “the cultural heritage of the areas” to the special qualities set out in the first purpose, and adding “understanding…of the special qualities of those areas” to the second purpose.
  4. In 2004 LUC prepared a report reviewing NPAs for the then Welsh Assembly Government. The review recommended that the delivery and promotion of sustainable development within the Parks should be enhanced by:
* Stronger national commitment to and guidance on the achievement of sustainable development within the Parks.
* Ensuring that the principles of sustainable development permeate all aspects of the National Park Management Plan.
* NPAs acting as advocates of sustainable development in all partnerships.
* NPAs developing a first stop shop role in the delivery of sustainable development, building on a role already identified.
* NPAs continuing to act as innovators through the use of special funding, such as the Sustainable Development Fund, allowing the development of small-scale bottom-up projects, which promote incremental steps towards sustainability.
* NPAs encouraging sustainable community development.

## Contribution of the planning system to sustainable development within the National Parks

* 1. A study carried out for the Welsh Government in 2012, ‘*Delivery of Planning Services in Statutory Designated Landscapes in Wales*’, compared statistics on planning determinations within the Parks to those of its neighbouring authorities and found little evidence to support the perception of NPAs as over-restrictive (see Table 1).

Table – Approval Rates in Welsh Local Planning Authorities (2008 – 2009)

|  |  |
| --- | --- |
| Local Planning Authorities | Approvals % |
| Pembrokeshire Coast National Park | 85% |
| Snowdonia National Park | 87% |
| Brecon Beacons National Park | 73% |
| Flintshire Council (whole LPA area) | 81% |
| Denbighshire Council (whole LPA area) | 84% |
| Anglesey Council (whole LPA area) | 91% |
| Gwynedd Council (whole LPA area) | 89% |
| City and County of Swansea (whole LPA area) | 78% |
| City and County of Swansea (whole LPA area) | 89% |

* 1. More recent data show that approval rates in the National Parks continue to be broadly similar to national rates:
* Pembrokeshire Coast NPA states that, on average, it determines 75% of applications within the 8 week target period and approves over 80% of applications.
* For the year 2013/14 to date the approval rate on all applications determined by the Brecon Beacons NPA is 91.7% (357 approvals from 389 determinations).
  1. When considering approval rates it should be noted that following a refusal a proportion of applications will be amended, resubmitted and subsequently approved.

## Perceived barriers created by the planning system

* 1. Despite the relatively high approval rates documented above, many prospective development proposals within the National Parks may never get as far as a planning application because many believe that difficulties that will be encountered. Research[[2]](#footnote-2) has revealed a strongly embedded perception that planning within the Welsh National Parks stands in the way of the socio-economic needs of the National Parks to the detriment of the sustainability of local communities and businesses. Perceived planning barriers included:
* Limited national guidance on landscape policy and the tools for landscape conservation.
* Decision-making on applications is too heavily weighted in favour of conservation.
* Socio-economic considerations are not taken into account at the right time, i.e. at the plan-making stage or pre-application advice meetings.
* A lack of partnership working between the NPAs and their County Councils.
* Inconsistencies in the development management process, for example: larger economic and residential developments benefit from more attention and advice than more common but smaller-scale economic developments, such as farm diversification proposals;
* Inconsistency in advice given at the pre-application stage.
* Over-emphasis on the use of traditional materials as a proxy for fitting-in with landscape character and achievement of environmental sustainability.
  1. This negative perception has resulted not just in tensions between applicants and planners but between NPAs and the overlapping local councils as both attempt to meet their respective objectives.

## Natural Resources Wales

* 1. Given the nature of the National Parks and their ‘Special Qualities’ the principle statutory organisation in the Parks is Natural Resources Wales (NRW). NRW is the principal adviser to the Welsh Government on the environment, enabling the sustainable development of Wales’ natural resources for the benefit of people, the economy and wildlife
  2. Many proposals for development will not only have to secure planning permission but an array of environmental permits and permissions before work can start. These include:
* Marine licences under the Marine and Coastal Access Act (2009).
* Abstraction (take) or impoundment (store) water licences under the Water Resources Act (1991) and The Water Resources (Abstractions and Impounding) Regulations (2006).
* Pollution Prevention and Control and Waste Management Licensing under the Environmental Permitting (England and Wales) Regulations (2010).
* Flood defence consents under the Flood Risk Regulations (2009) and Land Drainage Byelaws.
* Fisheries licences under Salmon & Freshwater Fisheries Act (1975).
* Tree, woodland, or forestry applications, involving Environmental Impact Assessment (EIA), grant scheme and felling applications.
* Protected sites and species licences under the National Parks and Access to the Countryside Act (1949), the Wildlife and Countryside Act (1981), the Conservation of Habitats and Species Regulations (2010), the Wildlife and Countryside Act (1981), the Habitats and Species Regulations (2010), the Protection of Badgers Act (1992), the Deer Act (1991) and the Conservation of Seals Act (1970).
* Open Access under the Countryside and Rights of Way Act (2000).
* Waste management permits, including landfill allowances, trading licences, radioactive substances, contaminated land, water quality and ground water vulnerability and the pollution control public register.

# Policy context

## Planning for sustainable development in Wales

* 1. Section 39 of the Planning and Compulsory Purchase Act (2004) requires that, in exercising their functions, local planning authorities in England and Wales must contribute to the achievement of sustainable development.
  2. The Wales Act (2006) placed a statutory duty on the Welsh Government to promote sustainable development in the pursuit of a sustainable Wales. The definition of Sustainable Development in Wales is:

*Enhancing the economic, social and environmental well-being of people and communities, achieving a better quality of life for our own generations in ways which:*

* *promote social justice and equality of opportunity; and*
* *enhance the natural and cultural environment and respect its limits - using only our fair share of the earth’s resources and sustaining our cultural legacy.*

*Sustainable development is the process by which we reach the goal of sustainability.*

* 1. With this definition in mind, the following principles underpin the Welsh Government’s approach to planning policy:
* Put people’s quality of life now and in the future at the centre of decision-making.
* Public participation in decision-making.
* Take a long term perspective to safeguard the interests of future generations, whilst meeting present needs.
* Respect environmental limits, so that resources are not irrecoverably depleted or the environment irreversibly damaged.
* Apply the precautionary principle when tackling issues such as climate change through mitigation and adaptation.
* Use scientific knowledge to aid decision-making.
* Prevent pollution as far as possible, ensuring that the polluter pays for damage.
* Apply the proximity principle; solve problems locally.
* Consider all costs and benefits over the lifetime of development, including those which cannot be easily valued in money terms when making plans and decisions and taking account of timing, risks and uncertainties.
* Collaborate with others in sharing information and knowledge and delivering outcomes with wider benefits.
  1. There is no particular ‘type’ of development that is sustainable; many types of development have that potential. Instead, Planning Policy Wales sets out sustainability objectives which all types of development should seek to meet:

Table Planning Policy Wales objectives for sustainable development

|  |  |
| --- | --- |
| No. | Sustainability objective |
| **1** | Promote resource efficient and climate change resilient settlement patterns that minimise land-take (and especially extensions to the area of impermeable surfaces) and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites |
| **2** | Locate developments so as to minimise the demand for travel, especially by private car. |
| **3** | Support the need to tackle the causes of climate change by moving towards a low carbon economy. This includes facilitating development that reduces emissions of greenhouse gases in a sustainable manner, provides for renewable and low carbon energy sources at all scales and facilitates low and zero carbon developments. |
| **4** | Minimise the risks posed by, or to, development on or adjacent to unstable or contaminated land and land liable to flooding. This includes managing and seeking to mitigate the consequences of climate change by building resilience into the natural and built environment. |
| **5** | Play an appropriate role to facilitate sustainable building standards (including zero carbon) that seek to minimise the sustainability and environmental impacts of buildings. |
| **6** | Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities (including water supplies, sewerage and associated waste water treatment facilities, waste management facilities, energy supplies and distribution networks and telecommunications), while ensuring proper assessment of their sustainability impacts |
| **7** | Contribute to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems. In particular, planning should seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change. The conservation and enhancement of statutorily designated areas and of the countryside and undeveloped coast; the conservation of biodiversity, habitats, and landscapes; the conservation of the best and most versatile agricultural land; and enhancement of the urban environment all need to be promoted. |
| **8** | Help to ensure the conservation of the historic environment and cultural heritage, acknowledging and fostering local diversity. |
| **9** | Maximise the use of renewable resources, including sustainable materials (recycled and renewable materials and those with a lower embodied energy). Where it is judged necessary to use non-renewable resources they should be used as efficiently as possible. The use of renewable resources and of sustainably produced materials from local sources should be encouraged and recycling and re-use levels arising from demolition and construction maximised and waste minimised. |
| **10** | Encourage opportunities to reduce waste and all forms of pollution and promote good environmental management and best environmental practice. Waste arising from demolition and construction should be minimised, and opportunities to recycle and re-use this waste promoted. |
| **11** | Ensure that all local communities - both urban and rural –have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods. |
| **12** | Promote access to employment, shopping, education, health, community, leisure and sports facilities and open and green space, maximising opportunities for community development and social welfare. |
| **13** | Foster improvements to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity. In general, developments likely to support the achievement of an integrated transport system should be encouraged. |
| **14** | Foster social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that development is accessible by means other than the private car. |
| **15** | Promote quality, lasting, environmentally-sound and flexible employment opportunities |
| **16** | Support initiative and innovation and avoid placing unnecessary burdens on enterprises (especially small and medium sized firms) so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness. |
| **17** | Respect and encourage diversity in the local economy |
| **18** | Promote a low carbon economy and social enterprises. |
| **19** | Contribute to the protection and, where possible, the improvement of people’s health and wellbeing as a core component of sustainable development and responding to climate change. Consideration of the possible impacts of developments - positive and/or negative - on people’s health at an early stage will help to clarify the relevance of health and the extent to which it needs to be taken into account. |

## Planning for sustainable development in the Welsh National Parks

### History

* 1. The 1949 National Parks and Access to the Countryside Act laid the foundations for the three Welsh National Parks:
* Snowdonia National Park (Est. 1951).
* Pembrokeshire Coast National Park (Est. 1952).
* Brecon Beacons National Park (Est. 1957).
  1. Since their designations, the nature of the National Parks and mechanisms for their administration have evolved significantly. Under the Local Government Act 1972, county councils were required to form single National Park Committees for each Park to which development control and countryside functions were automatically delegated. It was from these that the current NPAs subsequently emerged.
  2. The Environment Act (1995) established two statutory purposes of National Parks, to:
* Conserve and enhance their natural beauty, wildlife and cultural heritage; and
* Promote opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.
  1. The NPAs also have a statutory duty to “*seek to foster the economic and social well-being*” of the communities in the National Park. Sustainable development occurs when an appropriate balance is found between these three components.
  2. Since 2003 the Sustainable Development Fund has provided further encouragement, seeking to promote sustainable development, partnership working and social inclusion among communities and businesses. Defra, the Welsh Government and the National Parks in England and Wales run the Sustainable Development Fund, supporting initiatives that demonstrate:
* Environmental, social and economic sustainability.
* Conservation and understanding of the National Park.
* Exploration of 'models' or 'best practice' for sustainable living through innovative ideas.
* Creation of new partnerships that have no access to alternative public funding.
* Support for or involvement of local communities.
* Involvement of young people.
* Encouragement of links with urban groups and visitors.

### Sustainability issues

* 1. Despite being home to less than 3% of the Welsh population, the Welsh National Parks’ contribution to the collective identity and prosperity of the nation is very significant. The Welsh National Parks account for over half a billion pounds of Wales’s Gross Value Added, representing 1.2% of the Welsh economy[[3]](#footnote-3). The Parks cover 20% of Wales, conserving and managing the landscapes and seascapes that represent the core of Welsh culture and are an important part of the Welsh economy.
  2. The National Parks have a duty to maintain the delicate balance between often conflicting sustainability issues. Based on the wide range of studies on the Welsh National Parks and the rural areas in and around Wales, the key sustainability issues facing the Welsh National Parks include:
* Climate change and species loss threatening the high quality environment, a cornerstone of the Parks’ cultural identity and economic potential.
* Lack of affordable housing and consequent outward migration, particularly of young people, affecting the vitality of rural settlements, aging the population, creating a skills deficit and reducing the ability of local businesses to recruit.
* Much of the population living in dispersed settlements, many of which lack of basic services.
* Poor intra-regional communications, IT facilities, accessibility and transport infrastructure.
* Over-dependence for employment opportunities on the public sector and a declining agricultural sector and other natural resource-based industries.
* Over-dependence on employment in low paid seasonal tourism rather than higher paid sectors such as professional services and high tech industry.

### Plan-making in the National Parks

* 1. The NPAs in England, Scotland and Wales are the statutory local planning authorities (LPAs) for land within their boundaries, fully responsible for all aspects of planning including development management, with their own LDPs framing their planning policy.
  2. In Wales, the administrative areas of ten different County Councils overlap the National Parks but whilst the County Councils are also LPAs, their planning powers only apply outside of the National Parks.
  3. All three National Parks in Wales have adopted LDPs. Each LDP contains an overarching vision for the future of the Park, within which sustainability plays a part. Strategic objectives are then set for achieving the vision. In the Welsh National Parks these objectives are set within the context of and must comply with the Park’s two statutory purposes and their socio-economic duty (see above). Strategic planning policies and more specific ones relating to particular locations or topics are then formulated to achieve the objectives.

### Development management in the National Parks

* 1. The National Park’s planning policies provide the framework within which planning applications are decided and, as outlined above, are a key means of implementing the purposes and socio-economic duty of the National Parks. The planning policies must strike a delicate balance between the often conflicting environmental, social and economic priorities of the Parks as well as being unambiguous so that they are applied consistently and effectively throughout the Parks. This is not easy and there is the potential for development management officers within the National Parks, developers or county council officers to interpret policies in different ways to those intended by the planning policy officers who drafted them. The criteria-based form of some planning policies may increase the risk of the policies being perceived as a barrier to sustainable development when in fact they seek to ensure that the right development will happen in the right places.

## Welsh National Park planning policies

* 1. The following section summarises the main strands of planning policy which are common to the LDPs of all three Welsh National Parks.

### Policy on National Park duties[[4]](#footnote-4)

* 1. All three Welsh NPAs seek to ensure that new development promotes the principles of sustainable development in ways which further the National Parks’ purposes and duty. Developments must conserve and enhance the natural beauty, wildlife and cultural heritage of the Park; and/or provide for, or support, the understanding and enjoyment of the special qualities of the National Parks in a way that does not harm those qualities and which assists the economic and social well-being of local communities.

### Major developments policy[[5]](#footnote-5)

* 1. Planning Policy Wales No. 5.5.6 does not permit major developments in National Parks unless rigorous assessment reveals exceptional circumstances that demonstrate an overriding public need. Rigorous assessment should include national considerations, the cost of and scope for siting the development outside the National Parks or the ability to meet the need for the development in some other way and the effects on the National Park purposes, local communities, the local economy, the environment and the cultural heritage of the National Parks of permitting or refusing the development.

### Spatial policy in the National Parks[[6]](#footnote-6)

* 1. The majority of development in the National Parks must take place near facilities and services to minimise the need to travel. Development should be led by existing community need and be distributed appropriately, in accordance with the National Parks’ settlement hierarchies. Consequently the Local Development Plans define settlement hierarchies in which most development is permitted in the larger settlements with lesser amounts allowed in smaller settlements. Adjacent to settlements and in countryside locations there are limited opportunities for development.
  2. Schemes broadly acceptable in the larger settlements are those that strengthen and enhance:
* The mix of housing types and tenure options, meeting local need.
* Appropriate retail provision in the main commercial areas.
* The tourism offer, including accommodation and visitor attractions / facilities.
* The night-time economy, increasing provision of restaurants and bars specialising in local produce.
* Community facilities including proposals for sustainable alternatives to using the private car.
* Mixed use developments incorporating employment.
  1. Only developments essential to community sustainability, such as affordable housing or community facilities, are likely to be permitted in countryside locations adjoining settlement boundaries.
  2. Smaller settlements are likely to be appropriate locations for smaller scale versions of the developments outlined above, for example:
* One or two units of housing (to include affordable housing).
* Small scale employment.
* New community facilities within or adjoining settlement.
  1. Development is only likely to be permitted in the countryside where developers can demonstrate that the proposed development is:
* An appropriate conversion of an appropriate rural building, most likely for affordable housing.
* The sensitive filling in of small gaps or minor extensions in groups of dwellings.
* A Rural Enterprise Dwelling.
* Farm diversification.
* A tourist attraction or recreational activity dependent on local countryside.
* The enhancement of community facilities where there are no suitable locations in settlements.
* New farm buildings justified for agricultural purposes and sympathetically accommodated in the landscape.

### Policy on strategic planning issues

* 1. All proposals for development are required to demonstrate how the following strategic planning issues have, where relevant, been addressed within the scheme to the satisfaction of the NPA. Where necessary, the NPA will utilise Planning Conditions or Planning Obligations to ensure the provision of appropriate mitigation, compensation, and/or enhancement measures relating to development proposals.

#### Welsh language[[7]](#footnote-7)

* 1. Development in areas of the National Parks where the Welsh language is an important part of the culture and social life of the community should have no detrimental impact on the social, linguistic and cultural characteristics of the community.

#### Landscape[[8]](#footnote-8)

* 1. The nature, scale, design, setting and landscaping of all new development should respect and conserve the qualities and special character of the National Parks’ landscapes and seascapes. All development should avoid damage to landscape features and public views, including public or private open space and designated green wedges which retain openness and prevent the coalescence of settlements.

#### Wildlife and geology[[9]](#footnote-9)

* 1. All development must avoid adversely affecting the National Parks’ biodiversity (including healthy trees) and geological or geomorphological resources. This includes locally, nationally and internationally designated sites as well as biodiversity resources outside of designated sites, including Local Biodiversity Action Plan species and habitats.

#### Heritage[[10]](#footnote-10)

* 1. The historic landscape, heritage assets and cultural heritage of the National Parks should be conserved and enhanced. All development must avoid adversely affecting the following archaeological, architectural, historic or cultural assets and where appropriate, their settings and significant views:
* Conservation Areas.
* Scheduled Monuments and other sites of archaeological importance.
* Historic landscapes, parks and gardens.
* Listed Buildings.
* Traditional Buildings.
  1. All development within areas where important archaeological remains are known to or may exist must be evaluated by qualified and independent archaeologists.
  2. Developers wishing to alter, extend or change the use of a listed building or a building which makes an important contribution to the character and interest of the local area, whether internally or externally, are only likely to obtain planning permission if they can demonstrate that there will be no significant harm to the special historic or architectural integrity, character and setting of the building or historic features.
  3. Developers wishing to demolish, or partially demolish, a listed building are only likely to obtain planning permission if they can demonstrate that the building, or part thereof, cannot be retained or is not worthy of retention.

#### Pollution and waste management[[11]](#footnote-11)

* 1. All development must avoid unacceptable adverse impacts through increased resource use, discharges or emissions on: public health, surface and ground water (quality, quantity or ecology), air quality, soil and the best and most versatile agricultural land. Furthermore, it must avoid significant harm to the environment, neighbouring residential amenity or the amenity of the Park by way of noise, dust, vibration, odour, light pollution, hazardous materials or waste production. Provision must be made to reduce waste and facilitate its reuse and recycling.

#### Climate change[[12]](#footnote-12)

* 1. All development is expected to be resilient and adaptable to the likely effects of climate change and limit and mitigate the causes of climate change, for example by incorporating sustainable drainage systems, coastal and flood protection works, connecting and conserving green infrastructure and directing development to locations which reduces the need to travel, especially by private car. Development will be directed away from those areas which are at risk from flooding now or are predicted to be at risk in the future.

#### Sustainable design and construction[[13]](#footnote-13)

* 1. All developments, including extensions, are expected to attain at least the national sustainable building requirements and demonstrate an integrated approach to design and construction that considers: place and local distinctiveness; ecological and heritage conservation and enhancement; community cohesion and health; accessibility; and sustainable energy, water and waste management.
  2. All development must avoid adversely affecting the special character of the National Parks by causing significant visual intrusion; being insensitively and unsympathetically sited within the landscape; introducing or intensifying a use which is incompatible with its location; failing to harmonise with, or enhance the landform and landscape character of the National Park; or losing or failing to incorporate important traditional features.

#### Transport[[14]](#footnote-14)

* 1. The NPAs are committed to improving access to local facilities and reducing the need to travel, especially by private car. Therefore, a development proposal is more likely to be supported if a developer can demonstrate that:
* It provides essential local goods or services, for example education or food, which minimise the need for local people to travel further afield.
* There is convenient access via footpaths, cycle paths and public transport, reducing the need to travel by private car.
* There is an improvement in accessibility for all, in particular disabled people.
* It will assist in delivering improved traffic and parking management.
* It will reduce or remove vehicle traffic.
* Secure cycle parking facilities are provided where appropriate.

### Planning policies for specific land uses

* 1. The following policy provisions relating to specific land uses are common to all three of the Welsh National Parks’ LDPs. In some cases, policies relating to specific land uses repeat policy provisions that appear in generic policies relating to all types of development. These provisions have already been described above and are not repeated here.

#### Housing[[15]](#footnote-15)

* 1. All developments which result in a net creation of new dwellings, including the sub division of existing houses, changes of use, conversion of rural buildings, or new build are likely to require an Affordable Housing contribution. The contribution will be either through on-site provision, a commuted sum or a mix of both mechanisms. Planning permission for new affordable dwellings is likely to be subject to a legal agreement to ensure that they remain affordable in perpetuity for local people.
  2. Affordable housing development in the National Parks is likely to be permitted if it can be demonstrated by the developer that the development:
* Meets local community need in terms of size, type and tenure of dwellings, e.g. as evidenced by the results of a Local Housing Market Assessment or appropriate local needs surveys.
* Size and density are commensurate with the existing size of the settlement/character of the area.
* Dwellings are of a size is commensurate with the needs of the intended households.
* Is as good in external design quality and materials as proposed market housing units.
  1. Technical Advice Note (TAN) 6 Planning for Sustainable Rural Communities [[16]](#footnote-16) states that where development proposals are intended to meet the local needs of rural communities, they may be acceptable in locations which are only accessible by private car. Development not intended to cater primarily for local needs should be located in market towns, local service centres or clusters of smaller settlements where a sustainable functional linkage can be demonstrated and which are accessible by public transport.

#### Gypsy and traveller sites[[17]](#footnote-17)

* 1. Proposals for Gypsy and Traveller sites are likely to be permitted in the National Parks if developers can demonstrate that the development meets all of the following criteria:
* Meets local community need.
* On-site services waste, water and electricity services can be adequately provided without placing an undue burden on local infrastructure.
* Adequately addresses amenity issues for the new residents and neighbouring properties.
* Does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.

#### Community facilities[[18]](#footnote-18)

* 1. Community developments are only likely to be permitted within or adjoining settlements in the National Parks. Smaller settlements are likely only to be acceptable locations for development where there are no suitable sites in larger settlements. In order to get planning permission, developers must demonstrate that the development:
* Provides an essential facility that supports local community sustainability.
* Is convenient to public transport where required by the user.
* Does not have an unacceptable detrimental effect on existing infrastructure and the amenity and privacy of existing dwellings, nearby properties or the general public.
  1. Developers proposing developments that would adversely affect operational community facilities or result in their loss must demonstrate that the operational community facilities will be retained, enhanced or substituted via appropriate alternative means. The change of use of a community service or facility is likely to be refused unless it can be shown that the facility is no longer required or that its continued operation is not viable. When considering a new use for a redundant community facility, affordable housing or employment uses are likely to be prioritised.

#### Employment developments[[19]](#footnote-19)

* 1. Employment-generating development that improves the economic and social well-being of the National Parks’ communities is likely to be permitted within settlements. In addition, proposals requiring a countryside location, e.g. visitor facility or a farm diversification proposal or a conversion opportunity, and proposals within the curtilage of dwellings in the countryside are likely to be permitted they can demonstrate that they support any of the following:
* Sustainable tourism.
* Rural enterprise and the agricultural sector, both directly and through farm diversification.
* Town centres, and/or rural and farm shops.
* Green services, such as appropriately scaled renewable energy generation and carbon minimisation schemes.

#### Agricultural and forestry developments[[20]](#footnote-20)

* 1. New farm and forestry buildings are likely to be permitted if the developer can demonstrate that:
* The development will assist in maintaining the viability of a farm holding.
* The need identified in the proposal cannot be accommodated through the conversion of existing buildings.
  1. Developments relating to farm diversification are likely to be permitted if the developer can demonstrate that the development:
* Use is secondary to the primary use of the farm.
* Lies within or immediately adjacent to a group of existing buildings.
* Use is of an intensity appropriate to the local environment and setting with no significant detrimental effect on the vitality and viability of adjacent settlements.
* Does not prejudice functioning agricultural land in the surrounding area.
* Provides adequate storage for materials/equipment.
  1. Pembrokeshire Coast NPA relies on national planning policy in this regard.
  2. The National Parks are likely to use conditions attached to the planning consent or a legal agreement with the applicant to ensure that the new building is tied to the agricultural holding in perpetuity.

#### Local trade and retail developments[[21]](#footnote-21)

* 1. To maintain and enhance the vitality and viability of retail centres, the National Parks are likely to support developments for A1, A2, A3, B1, C1, D1 or D2 use classes in the larger settlements and a more limited range of uses (A1, A2 or A3) in smaller settlements which:
* If located within a primary frontage, would not create a concentration of non-retail uses.
* Contribute to the regeneration of Town Centres.
* Are appropriate in scale and style so as to positively contribute to the character and appearance of the area.
* Do not cause unacceptable disturbance to the occupiers of nearby property or adversely affect amenity.

#### Tourism developments[[22]](#footnote-22)

* 1. The National Parks’ planning policy on tourism development varies from Park to Park. New tourism developments and the enhancement of current facilities are generally supported where development:
* Promotes opportunities for the understanding and enjoyment of the ‘Special Qualities’ of the National Park, whilst not detracting from the quiet enjoyment and quality of life of local residents or the experience of visitors.
* Is designed to improve accessibility for all, in particular disabled people.
* Does not have an adverse impact on views to and from the National Park and does not generate an increase in noise or light pollution.
* Will improve current facilities or convert a vacant or underused building, including improving energy efficiency and/or conversion for renewable energy installations.
* Contains land or has access to sufficient land to provide appropriate access for the proposed tourist facility.
  1. Holiday accommodation is likely to be permitted within existing settlements, on sites not allocated or prioritised for other forms of development, such as affordable housing. New buildings for holiday accommodation, including hotels, hostels or guest houses, are unlikely to be permitted on greenfield sites.
  2. Loss of holiday accommodation in the National Park is likely to be permitted if the developer can demonstrate all of the following:
* Continued use of the existing facility is unviable.
* Overall demand for accommodation during peak periods will continue to be met.
* There is no adverse effect on the appeal and intrinsic character of the area.
  1. The Parks’ LDPs deal with new camping, caravanning, static caravan or chalet development differently. Generally, extensions of existing sites either by an increase in the number of pitches or enlargement of the approved site area, are unlikely to be permitted, except for:
* Upgrade of static caravan sites, touring caravan or tent pitches to other forms of self- catering in settlements.
* Enlargement of static and chalet sites to achieve an environmental improvement and better experience for the visitor without an increase in the operational area or pitch numbers.
* Improvement of site facilities where they are not already available in the vicinity.

#### Office and training developments[[23]](#footnote-23)

* 1. Small scale employment and training developments are likely to be permitted within the Parks’ main built up areas if the developer can demonstrate that the development will meet all of the strategic policy requirements and general development management principles set out above, in particular:
* The scale, nature and location of the proposal will not have an unacceptable adverse impact on the amenity of the surrounding area.
* Adequate access can be provided to service the development without adverse impact on the existing highways network.
* There are no adverse impacts on the natural beauty, wildlife, cultural heritage or environmental resources of the National Park.
  1. Changes of use from employment to other uses are only likely to be permitted if the developer can demonstrate that:
* The existing development is inappropriate in nature and scale for the locality.
* The potential for continued use for employment has been fully considered through the continued marketing of the site at reasonable market levels for at least one year.
  1. Where the loss of an employment site is justified, priority is likely to be given to community facilities or affordable housing.

#### Renewable energy developments[[24]](#footnote-24)

* 1. Small scale renewable energy proposals are appropriate where there are no overriding environmental or amenity issues.
  2. Larger scale renewable energy schemes are only likely to be permitted if the developer can demonstrate that the development would not have an adverse impact on the Natural Beauty (through landscape and visual impacts), wildlife, cultural heritage and special qualities of the National Park.
  3. Where there are other renewable energy schemes already in operation in the area, cumulative impacts will be an important consideration, notably cumulative landscape and visual impacts.

#### One Planet Developments

* 1. Low Impact Developments or One Plant Developments are much more than sustainably designed and constructed developments. To meet the essential characteristics of One Planet Developments, residents have to live quite differently (much more sustainably) than is the norm in the 21st Century. As outlined below, national planning policy specifies that an essential feature of One Planet Developments is a symbiotic relationship between people and the land, facilitating a reduction in environmental impacts.
  2. TAN 6[[25]](#footnote-25), originally published by the Welsh Government in July 2012 and updated in October 2012, contains advice in relation to One Planet Developments, taking forward the principles of Low Impact Development in the Welsh context.
  3. TAN 6 states that One Planet Developments must:
* Have a light touch on the environment – positively enhancing the environment wherever possible through activities on the site.
* Be land based – the development must provide for the minimum needs of residents in terms of food, income, energy and waste assimilation in no more than five years.
* Have a low ecological footprint – the development must have an initial ecological footprint of 2.40 global hectares per person or less with a clear potential to move to 1.88 global hectares per person over time. These are the Ecological Footprint Analysis benchmarks for all One Planet Developments.
* Have very low carbon buildings – these are stringent requirements, requiring that buildings are low in carbon in both construction and use.
* Be defined and controlled by a binding Management Plan which is reviewed and updated every five years.
* Be bound by a clear legal agreement that the development will be the sole residence for the proposed occupants.
  1. Ecological Footprint Analysis must be carried out and a Management Plan produced which should contain a:
* Business and Improvement Plan for Land-based Activities, Land Management, Energy and Water and Waste.
* Zero Carbon Buildings Plan.
* Community Impact Assessment.
* Transport Assessment and Travel Plan.
* Phasing, Monitoring and Exit Strategy.
  1. National Parks’ local planning policies require Low Impact development schemes to be in keeping with One Planet Development principles set out in TAN 6. Additional criteria are set out in local planning policy for some but not all of the Welsh National Parks. [[26]](#footnote-26)

## Pembrokeshire Coast planning application report review

* 1. A review of five planning decision notices from Pembrokeshire Coast NPA was conducted to gain further insight into the detailed planning issues and conditions that are relevant to a range of developments within the Parks. Two lists were generated from the review:

1. A list of regularly requested strategies and reports.
2. A list of commonly occurring planning conditions attached to planning permissions in the National Park.

#### List of regularly requested strategies and reports

* Construction/Demolition Method and Management Plan, outlining means of construction and demolition, hours of working, storage, etc.
* Sustainable Transport Plan and Travel Plan.
* Sustainable Waste Management relating to the sites demolition/construction and operation.
* Flood Risk Management Plan, although it should be noted that under the Flood and Water Management Act 2010 the local authority rather than the NPA has responsibility for flood risk management, including SUDS.
* Sustainable Energy Strategy, including appropriate Code for Sustainable Homes and BREEAM pre-assessments.
* Environmental Report, including necessary ecological surveys.
* Design and Access Statement.
* Cultural Heritage Strategy and, where appropriate, a statement of effects of development on heritage designations.
* Archaeological Appraisal and, where appropriate, a Programme of Archaeological Works.
* Affordable Housing Statement.
* Community Infrastructure Levy contributions, including education, public open space and highways improvements.

#### General conditions attached to planning permissions

* “The development hereby permitted shall be begun not later than the expiration five years beginning with the date of this permission.”
* “The development hereby permitted shall be carried out, and thereafter retained, strictly in accordance with the deposited plans and environmental reports, including design and access statement.”
* “All planting, seeding and turfing comprised in the approved details of landscaping shall be carried out in the first planting season the first beneficial use of the development approved or the completion of development, whichever is the sooner; and any other trees or plants which, within a period of five years from the completion of the development, fail, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species.”
* “Samples of all external finishes and colours to be used in the construction of the development shall be submitted to the NPA for approval, in writing, prior to the commencement of work. The development thereafter will be carried out and retained in accordance with the approved plans.”

# Consultation with National Park planners

* 1. LUC and Geo & Co Ltd prepared a discussion paper in preparation for a meeting with planning officers from the three Welsh National Parks. The meeting, which took place at the Brecon Beacons National Park offices on 4th December 2013, helped to define the purpose and scope of the SPG. The principal points agreed are summarised below.

### Purpose of guidance

* 1. The SPG should give greater definition of and articulation to what represents sustainable development in the Parks, it should be high level and unifying and it should take the form of Joint SPG.
  2. The Parks’ respective LDPs have already defined the amount of development appropriate with the Parks but that the SPG could provide further guidance to help manage its delivery.

### Audience and tone of guidance

* 1. The SPG should provide a ‘gateway’ to the planning system, helping applicants to navigate the Parks’ Local Development Policies and other detailed guidance documents before engaging in pre-application discussions with planners.
  2. Being aimed at the layman, the SPG must be user-friendly, succinct, clearly presented, avoiding the use of planning jargon where possible. The wording should be positive, highlighting what development is acceptable in the National Parks rather what won’t be acceptable.

### Evidence Base Report

* 1. The evidence base report should provide a summary of the chain of research leading to the SPG, highlighting the positive role of the planning system in delivering a range of development in the Parks.

### Content of guidance

* 1. The planners agreed that the introduction to the SPG should outline in simple terms the role of the planning system as a filter rather than a barrier; the purposes and duty of the National Parks; and the meaning of sustainable development (making clear that it is broader than building design, is seen through the lens of National Park purposes and is needed to maintain the Parks’ special qualities for future generations).
  2. It was further agreed that the main body of the SPG be split in to the fundamental ‘matters of principle’ against which all proposals will be considered – strategic policy objectives common to all three National Parks’ – and the ‘matters of detail’ planning officers must consider for specific land uses, including the following developments:
* Agricultural and forestry, where not Permitted Development.
* Employment generating, broken down into ‘normal’ uses which apply everywhere e.g. local tradespeople; tourism and recreation (some of these e.g. new public parks, may not actually generate employment but rather address the second National Park purpose); innovation. Consider new development; change of use; re-use / adaptation of rural buildings.
* Housing (open market including conversion; affordable housing; rural enterprise dwellings).
* Services and community development.
* Renewable energy (SPG does not apply to proposals which are ‘strategic’ in scale, as defined by Planning Policy Wales i.e. over 25MW for onshore wind and over 50MW for all other technologies; unlikely to come forward in National Parks and each judged on its merits).
* One Planet Development (agreed that it is better to explain exactly what this is and provide reference to the criteria it must meet than to ignore it).
  1. The planners mentioned that a caveat should be included in the document, stating that the SPG could not cater for every eventuality and that each case will need to be judged on its individual merits.
  2. In addition, the planners agreed that the SPG should make it clear from the outset that major developments should not take place in National Parks other than in exceptional circumstances and therefore the SPG only applies to proposals that are not major development.
  3. Finally, the planners requested that the SPG highlight that consents may be required in addition to planning permission, particularly permits and licences required from NRW.

### Stakeholder consultation

* 1. The planners endorsed the proposed purpose of the stakeholder consultation as being to seek the views of those promoting development on the content of the SPG, specifically where greater clarity, explanation or consistency in planning is required in planning for sustainable development.

# Consultation with stakeholders

* 1. LUC contacted 17 key stakeholders representing members of the County Councils’ Economic Development Teams, the farming community, tourism boards, housing developers and conservation organisations to seek views of those seeking to promote development in the Welsh National Parks. The stakeholders were sent introductory e-mails, followed up by telephone calls to secure times for telephone interviews. Of the 17 people contacted, one declined, four did not respond and two responded positively but were unable to find a suitable time to contribute. The following nine stakeholder organisations took part in the consultation between February 11th and February 25th 2014:
* The National Farmers Union.
* The Farmers’ Union for Wales.
* South West Wales Tourism Partnership.
* North West Wales Tourism Partnership.
* The Home Builders Federation.
* Gwynedd Council Economic Development Officer.
* Pembrokeshire County Council Regeneration Officer.
* The Campaign for the Protection of Rural Wales.
* Brecon Beacons Parks Society.
  1. Stakeholders were provided with an outline of the draft SPG in advance of the telephone interview and were asked to comment on the document’s intended scope, length and structure, and areas of planning policy where greater clarity, explanation or consistency might be required to deliver more sustainable developments in the Parks.

## Findings

* 1. The comments and views of the stakeholders were analysed with emerging themes aggregated into the main strands of consensus and contention. The findings have been split into three topics – comments on sustainable development in the National Parks and the content of the SPG; examples of sustainable developments in the Parks; and additional comments about the planning system in the Parks. The consultation results informed LUC’s recommendations on fine-tuning the content of the SPG, as presented in the final section of this report.

### Comments on SPG and sustainable development: Areas of consensus and useful standalone comments

#### Aim of SPG

* 1. Consultees were generally positive about the document’s stated aim:

*“To give greater definition of and articulation to what represents sustainable development in the Parks.”*

* 1. A few consultees commended the document’s cross-cutting role in engaging sectors on the broader opportunities of sustainable development in different sectors.

#### The length of the SPG

*“Massive documents put farmers off”*

* 1. Most consultees emphasised that for the document to succeed it must be short and simple, directing people to where they can find more information. One consultee mentioned that brevity also has the benefit of being more robust to changes in planning policy and politics. Another consultee suggested cutting down the ‘preamble’ on the Welsh Act and the definition of sustainable development to avoid people ‘switching off’.

#### Other notable points

* 1. A number of consultees suggested that the document clearly communicate:
* That the National Parks want to permit development, that it is in the Parks’ interests and that development can contribute to the Parks’ purposes through enhancing the environment.
* Who the document is for, i.e. developers and applicants.
* That the SPG is a material consideration for proposals within the Parks and visible from the Parks.
* That there are other mechanisms, beyond the planning system, that can help the Parks achieve sustainable development, such as behaviour change, waste management and transport strategies, localising business supply chains etc.
* That mixed-use developments are permitted as long as they consider all planning policies of relevance to the development s proposed uses.
* That in addition to planning permission, some developments may require other permits in relation to specific regulated areas, outlining these generally and the places to go for more information.
* Specific conditions used by all three Parks.
* The importance of the proximity principle[[27]](#footnote-27) in the Parks.
* How the SPG will inform pre-application discussions, including contact details (telephone numbers and e-mail addresses) for the Parks’ development management teams.
* The SPG’s relationship with the Parks’ LDPs and Management Plans.
* Definitions of sustainable development, the Silkin Test and Sandford Principle.
* The distinction between retrofitted renewables and standalone renewables.

#### Timing of SPG

* 1. One consultee mentioned the recent Welsh Planning Bill and proposed that the publication of the SPG be delayed until the contents on the forthcoming Act can be incorporated into the document.

### Comments on SPG and sustainable development: Areas of contention

#### Definitions and visions for sustainable development in the Parks

* 1. Two distinct interpretations of sustainable development in the Parks emerged from the consultation.
  2. Consultees representing economic interests in the Parks, i.e. farmers, tourism, and house building, favoured a move to a more balanced definition of sustainable development. They recognised the importance of the National Park ‘Purposes’ and the environment but felt that the current approach to development in the Parks risks undermining the social and economic development essential to the Parks’ futures.
  3. Consultees representing organisations whose main interest is to protect the natural environment of the Parks favoured an ‘environmental limits’ approach, which suggests that sustainable development could only be achieved through development which maximises and enhances the Parks’ special qualities and that this in turn will generate long term social and economic gains.

### Examples of sustainable developments in the Welsh National Parks

* 1. Consultees were asked for good examples of sustainable developments within the National Parks but these were not forthcoming. Some consultees were reluctant to provide examples because sustainable development is determined over a long period rather than in the short-term; those that did recommend examples only referred to ‘green’ developments, i.e. community renewable schemes. Without consensus, it could be controversial for the SPG to identify examples of sustainable development in the Parks.

### General comments about planning in the Welsh National Parks

* 1. There was general consensus that planning policy at the national and local levels needs to be improved.

#### Pre-application advice

* 1. Several consultees mentioned the importance of the pre-application process in giving applicants an opportunity to build relationships with planners and sound-out ideas.

#### Tourism

* 1. Planning is seen as a ‘big stick’ in tourism. Consultees felt that proposals that enhance and diversify the Parks’ tourism offer are generally rejected, restricting the Parks’ capacities to compete with other attractions and cater for new demands. The consultees representing tourism partnerships mentioned the need for development that supported and facilitated growing demands for specific visitor accommodation and activities such as: budget hotels; a move away from ‘iron-grid’ holiday parks to low density, landscaped parks; fewer traditional camping sites in favour of ‘glamping’ facilities such as yurts; better berthing facilities for boats; activity centre/experience facilities e.g. zip lines.

#### Brownfield land

* 1. Most of the consultees mentioned the need to redevelop brownfield land first. One consultee expressed the opinion that brownfield land within existing settlements is very different to brownfield land in open countryside and that the two should therefore be treated differently by planning policy.

#### Housing

* 1. Some consultees singled out housing policies in the Parks as needing to be more flexible and responsive to community needs.
  2. Affordable housing policy was a point of contention. Consultees representing housing or economic development interests saw existing policy within the Parks as too restrictive, reducing the viability of housing development in the Parks. Others believed that not enough has been done to prioritise affordable housing.

#### Farming

* 1. One consultee mentioned the need for the Parks to acknowledge more of what farmers do well, for example maintenance and conservation of the landscape.

# Conclusions and recommendations

## Recommendations arising from stakeholder consultation

* 1. The stakeholder interviews revealed broad support for the purpose and outline structure of the Sustainable Development SPG. Having considered on the comments from stakeholders, the following recommendations are made in relation to the content of the SPG:
* Scale-back the content of the green boxes in the draft SPG i.e. replace detailed policy criteria with explanation of the rationale for the main policy objectives and high level summaries of policy common to the three Parks.
* Do not include examples of sustainable development from SPG.
* Limit technical discussion of the meaning of the term ‘sustainable development’ to its relationship with the Parks’ Purposes and Duty.
* Clearly communicate:
  + - * Who the document is for.
      * That appropriate development is welcome in the Parks.
      * That the SPG is a material consideration for proposals within and visible from the Parks.
      * Policy in relation to mixed-use developments.
      * Contact details for pre-application advice, if this can be provided in a ‘future-proof’ form.
      * The proximity principle.
      * That additional permits that may be required and where more information can be found.
      * Specific planning conditions commonly used by all three Parks.
      * The relationship of SPG to the National Parks’ LDPs and Management Plans.

## Recommendations for future LDP policy improvement in the Welsh National Parks

* 1. The task of consolidating the relevant planning policies in the three Welsh National Park LDPs has helped to identify the following opportunities for future improvements to those policies.
* *Eliminate repetition within each Plan:* Each LDP should be read as a whole by developers and planners alike – no one policy can be referred to in isolation. Therefore, in the interests of clarity, brevity and consistency between National Park policies, policy content should not be repeated. For example, land use policies should be specific to the land use they address and not repeat policy which applies to all development and which has already been covered in more all-inclusive policies, such as Snowdonia LDP Development Policy 1: General Development Principles.
* *Standardise policy wording between Plans:* National Parks’ LDP policies often say the same thing but use different wording giving rise to opportunities for misinterpretation by developers and planners across the National Parks. Where the same issue is being addressed, standardised policy wording agreed between the three NPAs would facilitate user understanding.

1. LUC for Welsh Government, 2012, Delivery of Planning Services in Statutory Designated Landscapes in Wales, [↑](#footnote-ref-1)
2. LUC for Welsh Government, 2012, Delivery of Planning Services in Statutory Designated Landscapes in Wales. [↑](#footnote-ref-2)
3. Valuing Wales’ National Parks, ARUP, 2013 [↑](#footnote-ref-3)
4. Brecon Beacons SP1 – Policy 1; Pembrokeshire Coast Policy 1; Snowdonia Strategic Policy A [↑](#footnote-ref-4)
5. Brecon Beacons SP2; Pembrokeshire Coast Policy 19; Snowdonia Strategic Policy B [↑](#footnote-ref-5)
6. Brecon Beacons SP10, E LP1; Pembrokeshire Coast Policy 2, 3, 4, 5, 6 and 7; Snowdonia Strategic Policy C and Development Policy 1 [↑](#footnote-ref-6)
7. Brecon Beacons Policy 34; Pembrokeshire Coast Policy 12; Snowdonia Development Policy 18 [↑](#footnote-ref-7)
8. Brecon Beacons Spatial Policy 1; Pembrokeshire Coast Policy 8 and 15 ; Snowdonia Strategic Policy D, Development Policy 2 and 5 [↑](#footnote-ref-8)
9. Brecon Beacons Policy 2, 3 and 4; Pembrokeshire Coast Policy 10 and 11; Snowdonia Strategic Policy D [↑](#footnote-ref-9)
10. Brecon Beacons ‘New Policies’ in Composite Plan; Pembrokeshire Coast Policy 8, 13 and 14; Snowdonia Strategic Policy F, Development Policy 7 and 8 [↑](#footnote-ref-10)
11. Brecon Beacons Strategic Policy 4 and Policies 5, 6, 7 and 8, 42, 43, 44 and 45; Pembrokeshire Coast Policy 9, 31 and 32; Snowdonia Strategic Policy F and Development Policies 1 and 4 [↑](#footnote-ref-11)
12. Brecon Beacons Strategic Policy 4 and Policy 38; Pembrokeshire Coast Policies 7, 32 and 34; Snowdonia Strategic Policy Dd [↑](#footnote-ref-12)
13. Brecon Beacons SP11 and Policy 9; Pembrokeshire Coast Policies 15 and 29; Snowdonia Strategic Policy F and Development Policy 6 [↑](#footnote-ref-13)
14. Brecon Beacons SP17 and Policies 39 and 40; Pembrokeshire Coast Policies 52, 53 and 54; Snowdonia Strategic Policy L [↑](#footnote-ref-14)
15. Brecon Beacons SP6 and Policies 13 and 41; Pembrokeshire Coast Policy 16; Snowdonia Development Policy 11 [↑](#footnote-ref-15)
16. TAN 6 Planning for Sustainable Rural Communities para. 2.2.3, Welsh Assembly Government, 2010 [↑](#footnote-ref-16)
17. Brecon Beacons Policy 16; Pembrokeshire Coast Policy 46; Snowdonia Development Policy 13 [↑](#footnote-ref-17)
18. Brecon Beacons Policies 32, 33, 50; Pembrokeshire Coast Policy 48; Snowdonia Strategic Policy Ng [↑](#footnote-ref-18)
19. Brecon Beacons SP12 [↑](#footnote-ref-19)
20. Brecon Beacons Policies 20 and 23; Pembrokeshire Coast Policy 7h; Snowdonia Development Policy 20 [↑](#footnote-ref-20)
21. Brecon Beacons SP12 and SP13 and Policies 19, 24, 25 and 26; Pembrokeshire Coast Policies 49, 50 and 51; Snowdonia Spatial Policy H and L and Development Policies 24 and 25 [↑](#footnote-ref-21)
22. Brecon Beacons SP14 and Policies 27, 28, 29 and 30; Pembrokeshire Coast Policies 35, 36, 37, 38, 39, 40 and 41; Snowdonia Spatial Policy I and L and Development Policy 25 [↑](#footnote-ref-22)
23. Brecon Beacons Policies 17 and 18; Pembrokeshire Coast Policy 43; Snowdonia Spatial Policy H and Development Policy 19 [↑](#footnote-ref-23)
24. Brecon Beacons SP9; Pembrokeshire Coast Policy 33; Snowdonia Development Policy 3 [↑](#footnote-ref-24)
25. Technical Advice Note 6, Planning for Sustainable Rural Communities, Welsh Government, October 2012 [↑](#footnote-ref-25)
26. Pembrokeshire Coast Policy 47 [↑](#footnote-ref-26)
27. The Proximity Principle: is the idea that compact cities, towns and villages produce the best social, economic and environmental outcomes. Proximity brings people, shops, schools and healthcare closer together. It drives creativity and innovation. It means less distance to travel: people are more likely to walk or cycle, which in turn makes streets safer and more welcoming. There are environmental advantages, too, with less land and energy required. [↑](#footnote-ref-27)