

**PEMBROKESHIRE COAST  
AND  
SNOWDONIA  
NATIONAL PARK AUTHORITIES**

**A report by the Joint Scrutiny Committee  
on the impact of the policies and work  
of the National Park Authorities  
on the economic activity of both National Parks**

**July 2015**



**Parc Cenedlaethol  
Arfordir Penfro  
Pembrokeshire Coast  
National Park**



## **Foreword**



**Mrs Gwyneth Hayward**  
**Chairman of the Joint Scrutiny Committee on the impact of the policies and work of the National Park Authorities on the economic activity of both the Pembrokeshire Coast and Snowdonia National Parks**

This scrutiny review was the first to be undertaken jointly by the Pembrokeshire Coast National Park Authority and Snowdonia National Park Authority. While this project was the fourth for the Pembrokeshire Coast National Park Authority to embark upon, it was the first venture into scrutiny for the Snowdonia National Park Authority. It has been an interesting process and I would like to thank the Members of both Authorities for taking part and for their assistance in formalising this report.

In developing the conclusions and recommendations contained in this report we have taken into account the evidence provided to us by a number of individuals and organisations who have been willing to come and talk to us or submit written evidence. On behalf of the Joint Scrutiny Committee, I would like to thank all of those who have contributed and we hope that the content of the report reflects the contributions made.

A handwritten signature in black ink that reads "G. Hayward". The signature is written in a cursive, flowing style.

## 1. Executive Summary

The Pembrokeshire Coast National Park Authority (PCNPA) and the Snowdonia National Park Authority (SNPA) agreed to undertake a Joint Scrutiny project to establish how successful National Park policies and work were in supporting economic activity. A Committee was formed of Members from each Authority and the first meeting took place in February 2014. Evidence was gathered from a wide variety of sources which enabled the Joint Scrutiny Committee to gain a greater appreciation of economic activity and to evaluate the role of National Park Authorities and their policies. It also provided an insight into the perception of businesses on the issue of whether National Parks facilitate a positive economic environment.

At an early stage in the Committee's deliberations it became apparent that business attitudes to and understanding of National Park Authorities differed widely depending upon the size of business and the sector in which they operate. It also depended upon with which of the services or departments of the National Park Authorities they were engaged. For example businesses often praised the work done by the NPAs in promoting tourism, the ecology and quality of life while expressing reservations on the planning process.

In general the opinion was expressed that there should be more awareness in NPAs of the needs of the business community and more tolerance in NPA policies especially when facing changing economic conditions. There is in the view of some sectors that National Park Authorities need a better understanding of the pressures on the business community and that National Park Authorities have to be more proactive in proposing solutions to business problems. By the same token it was often clear that businesses did not clearly comprehend the imperatives which guide National Park policies. Clearer guidance and more engagement by Authorities with business and vice versa would be advantageous but at a time of budget stringency and heavy workloads it is difficult to see how this might be achieved. (Ref. 2.1, 2.5, 2.6)

Particular reference was made by businesses and politicians to policies such as PCNPA's Affordable Homes policy and to their Accessibility policy as an example of supposed inflexibility and outdated relevance. (Ref. 2.8)

Most respondents either independently or when asked stated their support for the elevation of the current economic duty to that of a purpose. In view of the ongoing Review of Designated Landscapes it is significant. It was also clear that where a conflict occurred between landscape and the economy the Sandford Principle should prevail. (Ref. 2.2, 2.3)

While the elevation of the economic duty lies in the future the economic remit remains with Local Authority economic development teams. It was clear that closer links should be fostered to provide greater intelligence on the National Park economy in order to facilitate a better focus for new policies especially with regard

to the forthcoming review of Local Development Plans (LDP) and National Park Management Plans (NPMP). (Ref. 2.6, 2.7, 2.8)

While some of the comments above suggest the need for changes it would be an inaccurate reflection of the evidence if it was not made clear that the majority of respondents regarded the NPAs positively and with enthusiasm. It often seemed that we fail to market ourselves adequately and that the NPAs should remind businesses of our many successes. The National Park brand was popular with business and was certainly significant in the tourism sector and more needs to be done to promote it. (Ref. 2.3, 2.9)

It is clear that more precise preparation should be put in place before the start of a scrutiny exercise and that there should be strict adherence to agreed timelines. Nonetheless, much useful information and understanding of perceptions emerged as a result of the Committee's endeavours which will help to inform future policies both of the National Park Authorities and the Welsh Government. (Ref. 2.4, 2.7)

During the study some businesses highlighted the need to promote local sustainable businesses as a career for the young. This was seen as an important element in stemming the flow of young people out of rural areas at a time when the demographic in these areas was becoming increasingly elderly. It would also be of great significance in promoting the Welsh language. While we did not investigate this issue in detail we do consider that it is an issue that merits comment and is an area where the NPAs may wish to assist other organisations in the future.

## 2. Recommendations

- 2.1 National Park Authority policies need to be drawn up with a degree of tolerance and sufficient flexibility so as to be able to take into account changing economic and market circumstances and the differing needs of business, or to be in place for a shorter time period which would allow more regular refreshment and updating.
- 2.2 Reflecting the views expressed by businesses, the Committee strongly supported the proposal in the Part 1 report of the Review of Designated Landscapes that a socio economic purpose be developed for the National Park Authorities and that this change should take place as quickly as possible. However, there was some concern that the wording suggested by the Panel could be interpreted as only applying to cultural heritage. Where a conflict between the economic duty and the first two purposes occurs priority would be given to the first purpose (The Sandford Principle).
- 2.3 The value of the National Park brand should be more widely recognised and that the National Park Authorities should build upon existing relationships and work in partnership with organisations such as Visit Wales to identify additional resources to build and promote the National Park brand.
- 2.4 National Park Authorities should consider providing opportunities for their staff and Members to further their understanding of the needs and drivers of local businesses and become more active in relevant business and economic fora.
- 2.5 National Park Authorities should provide more guidance to businesses on their work and the impact it can have on the local economy within a National Park. This could be on planning issues such as preparing quality planning applications and there may be a role for organisations such as the Royal Town Planning Institute or Planning Aid to provide training for small businesses.
- 2.6 National Park Authorities should seek to develop closer working relationships with Local Authority economic development teams. There should be an agreed focus and action plan to jointly address the identified needs. Likewise Local Authority economic development departments should fully embrace the potential of protected areas in driving economic benefits. This would provide a focus to assess the impact of future policies and actions with particular reference to the imminent review of Local Development Plans (LDP).
- 2.7 National Park Authorities should seek opportunities to identify data to provide greater baseline intelligence on the National Park economy.
- 2.8 The contribution and impact of the wider work of National Park Authorities on the business community should be recognised. Policies such as those to provide affordable housing and accessibility should be monitored, reviewed and amended, where necessary, to take account of the reality of living in rural Wales, with limited public transport availability.

- 2.9 A campaign to promote the positive impact of the National Park and the work of National Park Authorities on the business community should be prepared and delivered to remind and promote to businesses and others the numerous things that the National Park Authorities are seen to do well.
- 2.10 As part of a reflection on the process Members considered that future scrutiny projects need to have a clearly defined and agreed timeline and a commitment from all those involved to deliver to the agreed deadlines.

### 3. Introduction

Traditionally, National Park Authorities have not had a practice of joint scrutiny, although several of the UK NPAs have audit committees. The composition of NPAs, with the absence of an executive, provides a challenge in that all Members comprise 'the Authority', by which all decisions are made. While the NPAs are not legally required to embed scrutiny in its functions, its potential is recognised as highlighted in the Welsh Government's *Beyond Boundaries (Citizen-Centred Local Services for Wales)* report:

"All public service organisations should welcome scrutiny as a means to improve and learn." (Paragraph 3.23)

"The aim should be to provide effective challenge to organisational culture and examine whether public services together are achieving desired outcomes. The scrutiny process could be enhanced considerably by the involvement of users of services, advocates and expert advisors." (Paragraph 3.24)

"Policy overview and pre-decision scrutiny can improve the quality of decision making." (Paragraph 3.25)

With this in mind, the Pembrokeshire Coast National Park Authority (PCNPA) and Snowdonia National Park Authority (SNPA) agreed to undertake a joint scrutiny review to establish how effective the National Park Authorities' policies and actions were in supporting job creation and a thriving economy.

Members from each NPA were assigned to the Joint Scrutiny Committee which had its first meeting in February 2014. An outline of the activity and processes undertaken is given below and this report has been prepared as a summary with the intention of it being presented, along with its recommendations, to the two NPAs for consideration and determination of any actions that are seen as desirable.

In presenting this report, the Joint Scrutiny Committee would like to acknowledge and thank the wide number of people and organisations who contributed to its work including officers from both NPAs and particularly the large number of stakeholders who shared their views and presented their evidence. The value of the report is very much dependent on the quality and thoroughness of the submissions and while the Committee acknowledges that statistically sound quantitative surveys were not able to be undertaken the level of understanding from the views of the sample across a wide spectrum has, we believe, enabled us to form a much better understanding of the position and sound conclusions and recommendations that can be supported by what we have established – much of which is outlined in detail in the appendices.

#### 4. Objectives

The prime objective of this exercise was to establish how successful National Park Authority policies and work are in supporting economic activity within the National Parks.

The initial objective of the project was to establish how effective National Park policies were in supporting micro businesses i.e. those with fewer than 10 employees. It was decided at a later date to include small and medium sized enterprises (SME) as it was felt that the original remit would not produce a clear reflection of the full extent of economic activity in the National Parks.

Having established the remit it was decided that the Members undertake a small-scale but focused investigation of business activity. This would include taking evidence, both oral and written, from businesses from different sectors and of varying sizes and stages of development, local authorities, politicians, business representative bodies, Welsh Government and the relevant departments of the National Park Authorities. However, it should be noted that, while the selected businesses were deliberately chosen to cover a wide range of sectors, they were only a sample.

The objective of these investigations was:

- To provide an insight into the diversity of economic activity in the two National Parks;
- To evaluate the impact of National Park policies on economic activity;
- To make relevant conclusions based on the submissions received;
- To present our conclusions and recommendations to the National Park Authorities.



## 5. Current Responsibilities

### **The Remit and Responsibilities of National Park Authorities**

The purposes of National Park Authorities are defined as follows in the Environment Act, 1995:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.
2. To promote opportunities for public enjoyment and understanding of its special qualities.

National Park Authorities also have a duty to foster the economic and social wellbeing of local communities within the Park.

### **Economic Development Responsibilities of National Park Authorities:**

NPAs have a duty to “*foster the economic and social well-being of local communities within the National Park...*” when carrying out these purposes. This duty is set out in the Environment Act 1995 Part III – National Parks Article 62(1)<sup>1</sup>. In the carrying out of their functions NPAs are also required to produce a National Park Management Plan<sup>2</sup>; this along with the requirement to produce a Local Development Plan (Planning and Compulsory Purchase Act 2004) along with its associated environmental and sustainability appraisals are the statutory strategies by which purposes and the economic duty are delivered.

### **Economic Development Responsibilities of Local Authorities:**

Local Authorities “have a statutory power to promote the economic, social and environmental well-being of their areas which is usually expressed through the Community Strategy”. The Local Authority also has “a duty to produce a Community Strategy which should bring together all partners and provide the long-term vision and direction for the whole of a local area. Underneath this overarching plan, the (*Local Authority*) also prepares a number of other key strategies, including a Local Development Plan (*for the relevant geographical area*), Children and Young Peoples’ Strategy and a Health and Well-being Strategy.”<sup>3</sup>

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<sup>1</sup> Article 62(1) “Duty of certain bodies and persons to have regard to the purposes for which National Parks are designated” Environment Act 1995 <http://www.legislation.gov.uk/ukpga/1995/25/section/62>

<sup>2</sup> Article 66(1) “National Park Management Plans” <http://www.legislation.gov.uk/ukpga/1995/25/section/66>

<sup>3</sup> (WLGA. (page creation date unknown). Local Government in Wales. Available: <http://www.wlga.gov.uk/local-government-in-wales>. Last accessed 10th April 2015.)

The power and duty described above are set out in the Local Government Act 2000 in articles 2(1)<sup>4</sup> and 4(1)<sup>5</sup>– Part 1: Promotion of economic, social or environmental well-being etc.

In June 2012 the Welsh Government issued new Guidance entitled “Shared Purpose – Shared Delivery”<sup>6</sup> that detailed the requirement for Local Services Boards to produce Single Integrated Plans (SIP) for their areas (by April 2013). SIPs combine the legislative requirement for the following: Community Strategies, Children and Young People’s Plans, Health Social Care and Well-being Plans and Community Safety Strategies.

At present the economic development remit resides with the relevant constituent Local Authorities all of whom control the resources required to foster economic activity.

### **The Review of Designated Landscapes**

The Review of Designated Landscapes commissioned by the Welsh Government published its Part 1 report in March 2015. The report recommended revising the Purposes of National Park Authorities and suggested the following:

- To conserve and enhance the distinctive landscape and seascape qualities of the area.
- To promote physical and mental wellbeing through the enjoyment of the landscape of the area.
- To promote sustainable forms of natural resource management and economic and community development which support the cultural heritage of the area.

It will be up to the Welsh Government to decide whether to accept these recommendations. It is expected that any changes in the Purposes will require primary legislation.

It is within this context that our work as a Joint Scrutiny Committee commenced.

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<sup>4</sup> Article 2 “Promotion of well-being” Local Government Act 2000:

<http://www.legislation.gov.uk/ukpga/2000/22/section/2>

<sup>5</sup> Article 4 “Strategies for promoting well-being” Local Government Act 2000:

<http://www.legislation.gov.uk/ukpga/2000/22/section/4>

<sup>6</sup> Shared Purpose – Shared Delivery (Welsh Government 2012)

<http://gov.wales/topics/improvingervices/localserviceboards/keydocs/sharedpurpdel/?lang=en>

## 6. Process

The Joint Scrutiny Committee of the Pembrokeshire Coast National Park Authority and the Snowdonia National Park Authority follows a pattern of Scrutiny established by Welsh National Park Authorities in recent years. These have included two joint scrutiny reviews undertaken by PCNPA and Brecon Beacons National Park Authority on the Sustainable Development Fund and on the Management of Rights of Way. There was also a scrutiny review on “The delivery of Affordable Housing policies” conducted by the PCNPA, which was completed in September 2013.

The decision to undertake a Joint Scrutiny on the economy was taken at the National Park Authority meetings of PCNPA on the 24<sup>th</sup> April 2013 and SNPA on the 17<sup>th</sup> July 2013. The Committee was required to gather evidence and to report their findings, with recommendations, to the respective National Park Authorities for consideration.

The Joint Scrutiny Committee met on the 21<sup>st</sup> February 2014 when the initial scoping exercise was undertaken. It was noted that this was the first experience of the scrutiny process for Members of SNPA, and a brief outline of the scrutiny methodology was provided. At this meeting it was decided that a review be undertaken to establish how successful National Park Authority policies were in supporting job creation in micro businesses (businesses employing less than 10 people). A number of relevant business organisations, institutions and individuals were identified from whom evidence on the economy would also be gathered.

The second meeting was held on the 17<sup>th</sup> September 2014 when it was decided to expand the remit of the Scrutiny Committee to include Small and Medium Size Enterprises (SMEs) and a small number of larger businesses to illustrate the wider context of economic activity.

An Interview Framework which would be used as a basis for each Member of the Committee to interview three businesses was agreed. While this was qualitative data it was considered that, given the range and type of businesses selected, the information would provide a valid insight into the National Park economy.

The third meeting held on the 20<sup>th</sup> January 2015 discussed the results of the Member interviews which were now available and a number of themes regarding economic activity and National Parks began to emerge:

- The impact of the planning process;
- The fact that good contacts with National Park staff and clear processes and procedures were important for business confidence in the Authorities;
- Very small businesses appeared to have a lack of capacity, understanding of/or difficulty in engaging with the National Park Authorities;

- Clear approval of, and support for, the work of the National Park Authorities in protecting the landscape and elements of its cultural identity.

As a means of understanding the context of economic activity in the Pembrokeshire Coast National Park, a meeting had taken place between the PCNPA Members of the Joint Scrutiny Committee and Officers and Members of Pembrokeshire County Council in order to discuss their respective approaches to the economy and to business activity. It was agreed that SNPA would conduct a similar meeting with Gwynedd County Council.

Arrangements were made to conduct two oral evidence sessions, one in Pembrokeshire and another in Snowdonia. The organisations and individuals interviewed would include a number of sectors such as tourism, agriculture, retail/chambers of commerce and outdoor pursuits. Local Members of Parliament and National Assembly Members would also be invited to give their views on their perception of the effect of National Park policies on the economic activity of their constituents.

The fourth meeting of the Committee was an oral evidence session attended by PCNPA Members and one SNPA Member on the 11<sup>th</sup> March 2015. Those presenting evidence had been provided with details of the issues that the Committee wished to cover beforehand. Evidence was heard from a number of organisations (see Appendix B1).

The fifth meeting on the 25<sup>th</sup> March 2015 comprised a further session of oral evidence, this time in Snowdonia, when evidence was presented in two categories; The Land Use Sector and The Outdoor Recreation Sector (see Appendix B2).

The sixth meeting took place on the 17<sup>th</sup> April 2015 when both PCNPA and SNPA Members met to consider the evidence to date and to discuss possible conclusions and recommendations.

The Joint Scrutiny Committee met on the 6<sup>th</sup> May 2015 when the draft report was considered and the final stages of its completion via email and further discussion was agreed.

A final meeting was held on the 8<sup>th</sup> July 2015, where the Chief Executives of the two NPAs were delegated to make final changes to the report in accordance with the views expressed by Members at the meeting.

## 7. Findings

A number of face to face interviews were undertaken with individual businesses or with organisations or individuals representing or supporting them. The interview framework that guided these discussions was drawn up in advance so as to assess and gather information and views across a number of identified themes. The following summarise the main findings.

### 7.1 Range and types of businesses in the National Parks

The types of businesses who participated in this exercise were varied and included a number of tourism or aspirational tourism businesses, engineering companies, a global energy company, agricultural operations and social enterprises. In total 27 businesses, 10 representative organisations, two local authorities, one National Assembly for Wales Member and two Members of Parliament provided evidence. While, given the nature of the exercise, this represents a very small percentage of the businesses operating in the National Parks, the choice of businesses was done deliberately so as to reflect the range of economic activity across the Parks. To give the wider perspective *The Valuing Wales' National Parks Report* (September 2013) advises that there are an estimated 1,390 business units in the Pembrokeshire Coast National Park employing 7,000 people, with the National Park's environment supporting 3,532 of these jobs directly and a further 529 indirectly. Whilst in Snowdonia there are an estimated 1,830 business units employing 8,800 people of which 3,700 are supported directly and a further 700 indirectly.

While the economic profile in both National Parks is very much geared towards small and micro businesses especially in the tourism sector this is not always the case. Some of the larger businesses are class leaders competing successfully with very well-known UK companies. For example, one respondent is a short break destination with a staff of over 500, a bed capacity of 1,350 (soon to expand to 1,800) and an all year round occupancy of 95%. The economic benefit to the local area provided by this one business alone through visitor spend and their own supply chain (all local or within Wales) is extremely significant.

Apart from the above the size of company scrutinised ranged from micro businesses employing just one or two people to larger SMEs with up to 100 or so staff. Seasonal variation was common and a number were very much family businesses. Many had been in business in the National Park for a number of years.

A number of businesses were struggling with the downturn of the economy and some were therefore seeking to diversify as a strategic response and move in to new areas of enterprise.

## 7.2 Support from the public sector

A number of businesses had received some form of public sector support, including from the National Park Authorities with a Sustainable Development Fund / Cronfa Arbrofol Eryri grant. Whilst useful and supportive in the main the very smallest business often found that their business development needs were not fully understood or catered for by other public sector and business support organisations.

Changes taking place in the procurement policies of the wider public sector, and indeed in some cases amongst larger companies in the private sector were making it difficult or indeed impossible for some small businesses to retain their local supply relationships as services were franchised out or contracts merged into larger tender requirements, the conditions of which could not be met by the very small businesses.

## 7.3 Customer base

Whilst all the businesses from which views were received were located in a National Park, the majority had a customer base that extended beyond the Park boundaries, often across Wales and the UK.

There were very few that relied on their location in a National Park as part of their business model and those that did saw their location in a National Park as some form of advantage and perhaps made use of the fact in their marketing. However, this was outweighed by others, who felt it was a perceived disadvantage to be located in and running their business in a National Park. Although in certain cases (very small businesses) this was tempered by the personal and lifestyle advantages that the location brought. Some land based industries were either neutral, or perceived benefits of being sited within a National Park.

## 7.4 Formal dealings with the National Parks

The opinion of respondents varied according to the support or engagement with the NPAs. This can broadly be summarised as positive relating to engagement with Wardens, Rangers and Conservation Officers, while the comments were more negative in relation to planning. This in contrast to user satisfaction feedback in both Authorities, as illustrated by user surveys in Snowdonia where, over the last 3 years, between 90% and 95% of users indicated they were either satisfied or very satisfied with the planning service they received. All users, irrespective of outcome of their applications, are sent customer satisfaction questionnaires.

The comments relating to planning were also influenced by outcome, with positive experiences meriting only a passing comment, while there was strong and, at times, emotive criticism when the outcome was less favourable to the applicant. This is consistent with the perception by users of other Local Planning Authorities' services (Ref: Planning Officers' Society Wales 2014/15).

One particular sector where there is regular contact with the National Park Authorities is that of farming. On an operational level there is mutual support and understanding between for example Rangers, relevant officers and farmers. On more of a policy level the many management agreements demonstrate both by their content, the fact that they are willingly entered into and often by their longevity that they provide real value to both parties.

Informal contacts often work very well between National Park staff on the ground and businesses operating within the Parks. An example of many similar comments is:

*“Warden team excellent with a very good relationship. Ecologist very good.”*

A number of respondents (including politicians) indicated that they had found that the Chief Executives and Senior Officers adopted a very pragmatic and common sense approach. This was an approach many of them indicated should inculcate the whole Authority, however, on a few occasions some staff were seen as inflexible. It was suggested that staff should be encouraged to adopt a more constructive position by suggesting alternative options where appropriate rather than refusal.

#### 7.5 Ways in which the National Park Authorities can better support businesses in the Park to prosper and expand

Most of the responses related to the need for improvement in how businesses were supported to engage with the planning process.

##### 7.5.1 Working through the Planning System

We heard that some of the smallest businesses and/or those whose contact with the planning process is undertaken without professional support, and often for the first time, felt that they are at a disadvantage when engaging with planning officers given their lack of experience in such things and the limited advice that was available. While many will attempt to overcome this by using an agent, this is not always successful as agents are not always sufficiently knowledgeable either. It should be noted that both NPAs provide a free pre-application service. Capacity issues by small businesses in engaging with planning was noted as an issue.

Some concerns were expressed about the perceived inadequacy of the planning process. While they accept that there need to be “*policies*”, in the view of some they are seen as too rigid, and too rigidly enforced. There is also a generic view that such policies are not always interpreted consistently. Small businesses had the perception of having little influence with the planning system whereas other larger businesses were more effective and were being listened to and accommodated. We heard concerns that the process lacked transparency and that the continuity of officers was a significant factor.

Although unfavourable comparisons were drawn with other planning authorities, officers presented examples of how they have supported businesses to navigate the planning process and reach successful conclusions. The fact that over 90% of applications submitted to the two NPAs are approved does support this view. In addition, there is a recognition that both NPAs have significantly improved the quality of their planning service over the past three years, whilst a number of the negative examples presented, but not all, pre-date this time. The recently published Planning Officers Society Wales Customer Satisfaction Survey 2014-15 indicates that satisfaction rates for both PCNPA and SNPA are well above the national average.

It may be that the real problem here is that of the gap between perception and reality. However, neither of the NPAs can be complacent in relation to its performance in the service and it was suggested by some businesses that there is a need for NPAs to consider different ways of engaging.

Some of the participants mentioned that the planning process itself is often confusing and “*not a great experience*”. However, there needs to be a recognition that the main components of the planning system, both process and policy, are set at a national level and apply to all Planning Authorities. Therefore a number of these concerns would apply to all Planning Authorities and not just NPAs. While there were some unfavourable comparisons with other Planning Authorities, Welsh Government statistics show that both NPAs significantly outperform their neighbouring Planning Authorities; however, more work needs to be undertaken to see if there are significant differences in the quality of services when comparing the current service provided by the two NPAs with others. The most recently published Welsh Government planning performance statistics show that both Authorities are in the top quartile of performing Authorities in Wales.

In summary, many of those who have engaged in the planning process believe that the NPAs need to be more flexible and inclusive in the way in which they deal with very small businesses in order to nurture them and ensure their survival in the National Park.

It should be noted however that some of the difficulty experienced with the planning process in the National Park Authorities is not always down to the NPA itself but with other agencies with which the applicant has to deal to comply with the requirements of the planning process, for example the statutory consultees. Members of PCNPA identified with this issue as a recent planning application had been deferred due to the absence of information from two statutory consultees. Members expressed the hope that changes brought in by the recent Planning Act will have a positive impact on information provided by statutory consultees.

It was also mentioned that the National Park Authorities’ planning policies can also impact on the effectiveness of other parts of the public sector in supporting the economy. For example one respondent stated that:



*“In terms of tourism it is very important that the roads are improved and renewed by the Council without planning difficulty from the Park.”*

As a National Park Authority is not a highways authority, road improvements are delivered through the actions and policies of other plans produced by others such as Welsh Government although NPAs can comment and seek to influence such infrastructure developments. More directly controlled infrastructure can for example be seen as in the land affected by Welsh Government and County Council road and cycle schemes are safeguarded in the Authority’s Local Development Plan from other developments that would be likely to prejudice their implementation. There are numerous examples where NPAs have worked in a positive manner with the relevant Authorities to ensure appropriate infrastructure for the areas e.g. improvements to the A470, A40 and Openreach – roll out of broadband.

Away from planning there were a number of suggestions of how NPAs could improve their support for businesses by differing means. NPAs support strategic projects on a local level e.g. through RDP funding. In Snowdonia the “Eryri Centres of Excellence” hub concept for activities was supported and promoted by the NPA, while Pembrokeshire Coast has taken a leading role in promoting the area as a tourism destination.

Activity tourism businesses rely on access to, and the maintenance of, the essential infrastructure on which they depend – essentially the attractive, challenging and accessible landscapes. Thus the maintenance of paths, especially the Pembrokeshire Coast National Trail is a vital service expected of and, indeed, generally acknowledged as being provided extremely well by the Authority. There are concerns at the silting taking place in Bala Lake which could impact on the water based activities using the site.

A view held by a significant number of businesses was that staff in NPAs should seek to get to know the local businesses better and understand their needs and how they operate and the pressures on them and vice versa. There were even suggestions that staff should job swap with, or shadow, business men and women to assist mutual understanding.

Many of the businesses to whom we spoke, especially the larger ones in the tourism and hospitality sector indicated that that they would welcome NPA officers having direct contact so as to understand their business requirements more effectively.

#### 7.6 Is there any business advantage in being located in a National Park?

The advantage of being located within a National Park depends on the nature of the business. As indicated above for the majority of tourism businesses consulted a location in the National Park is of significant importance while, for businesses less dependent on the landscape, a number saw it as neutral or a disadvantage to

be located in the National Park. Apprehension regarding the outcome in dealing with the NPA in a planning context was cited as the main reason by some businesses in not seeing a benefit in being located in a National Park.

Two large businesses with sites both within and outside the Pembrokeshire Coast National Park stated that, all things being equal, they would decide to locate outside the National Park. Although in these two instances it should be noted that while this might be a stated preference, in reality they had decided to site their businesses partly within the National Park.

In addition a number of respondents acknowledge that while their business may not gain any advantage, they and their families benefit from living in the National Park for the landscape and environment and the general quality of life. Indeed, going back to business perspective the quality of life benefits are seen positively by some as helping to both attract and retain skilled and valuable staff.

#### 7.7 Factors that interviewees considered most important to their businesses

The interview framework required the respondents to identify which of the following factors was most important for their business. The factors listed were:

- Landscape
- Nature
- National Park status / brand
- Recreation opportunities
- Welsh language and culture
- Area protected by planning
- Quality of life
- Other

By a large proportion the most important factors were deemed to be landscape, nature and quality of life:

*“landscape and nature attract tourists and quality of life is significant in retaining long term staff” (D.3.11)*

Landscape is:

*“what sets the location apart and gives it a market advantage” and quality of life “is a massive benefit” (D.3.13)*

The National Park brand was also seen by most respondents as a benefit particularly to businesses operating in the tourism sector. It was seen to:

*“underpin the attractiveness and quality of the area which is important for business” (D.3.13)*

National Park advertising raised awareness of the beauty of National Parks which helped in business promotion:

*“the fact of being in a National Park is important to this (hotel) business as being in the only British coastal National Park”* (D.3.9)

Surprisingly, recreation was rated at a much lower scale than the above as a factor in business success. On a personal level most interviewees saw it as one of the attractions of living in a National Park.

There was a positive response to the role of the Welsh language as a factor in business activity, especially in Snowdonia. In one Pembrokeshire response it was stated that:

*“the Welsh language and culture are significant in attracting business”* (D.3.9)

However, not all responses were positive:

*“Welsh language policies are detrimental... ..and add costs and uncompetitiveness”* to some businesses (D.3.13)

The response to the question regarding the National Parks being an area protected by planning was also mixed, with strong views expressed on both sides:

*“There is value in this preserving the defining characteristics of an area”* (D.3.13)

and:

*“planning is of great significance as it protects the landscape and the high quality of life”* (D.3.13)

but was balanced by the assertion that:

*“planning was not a great experience”* (D.3.10)

and

*“poor interpretation by planning officers can prevent or nullify what could otherwise be positive developments.”*

One large project process application site made a number of very positive comments on their experience of National Park planning but emphasised the need to develop an expertise in dealing with such large planning applications. (D.3.3)

Other factors included were the availability of diverse retail and leisure facilities which enhanced the attractiveness of an area to both inhabitants and tourists. The need to support local business activity was also regarded as a factor and other comments referred to the need for:

*“economic development and the securing of jobs”* (D.3.3)

## 7.8 Marketing – The Brand

A common theme among those businesses involved in hospitality and tourism was that the National Park brand is a very powerful and supportive mechanism and one which they hold in high value. Many of their customers come from outside the local area and as one said:

*“The Park brand is important when marketing”*

The award winning nostalgia poster campaign run by PCNPA over the past couple of years came in for high praise even from some of the sternest critics of the National Park Authorities and many see that the Authorities should be devoting even more effort and resource to such supportive marketing.

One large business that makes good use of the brand in marketing themselves as “a National Park Resort” spends over £1.5m pa in marketing throughout the UK and Ireland and suggested that that there is potential for the effectiveness of both their marketing and that of the National Park to be improved by closer co-ordination of message, timing and delivery. They would welcome a closer working relationship with the NPA to this end.

## 7.9 Size of business

Comment has already been made as to the difficulties, real or perceived, that very small businesses have in dealing with planning matters. They have capacity issues in terms of time, resources and knowledge and therefore don't have the contacts within the NPAs that can guide them or give them confidence and are often so tied up in the day to day of business survival that they don't give such issues the attention they ought. This is surprising in view of the fact that both NPAs have well publicised free “Pre-application” processes that provide support and advice for all applicants. This may also suggest that small businesses do not use Planning Agents to assist with submitting planning applications.

Larger businesses and those that have got experience of working with NPA officers and have built up a relationship with them have far fewer barriers. They may still not fully understand some planning policies and this can lead to dissatisfaction and a perception of lack of flexibility, but they know how to negotiate the planning system.

Whilst allowing them to find a way forward for their own businesses the partial view seen by outsiders can be that the Authority is partial to certain sectors such as bigger businesses. This isn't always very helpful, mind you, as we had complaints from farmers that NPAs are too supportive of tourism and from tourism that the Authorities are too supportive of farmers!

The largest companies can see that the National Park Authorities' policies, especially as evidenced through the planning process, are just one more hurdle to overcome. They treat this as a straightforward task, provide whatever resources

are required to deal with it and are quite dispassionate and objective in their dealings. National Infrastructure Projects are considered by the Planning Inspectorate and application fees are not received by the affected planning authorities. This can have a significant impact on the resources of the Authority. These issues have been raised previously and will be looked at again by the Authority in response to the current consultation on establishing a new system for the Welsh Ministers to process 'Developments of National Significance' (DNS).

Such companies have both the approach and resource to engage with officers at both a very high policy and a very detailed on the ground level. When developments are so large that they are not the type normally met by National Park Authorities, or many other planning authorities, then the quality and understanding of the officers and Members involved can be crucial to achieving a satisfactory result. The NPAs are blessed with such officers but when it is recognised that there is a need then external support is bought in.

A concern raised by one commentator was the role of Committee Members in the decision making process. There was a perception that there can be a danger that a proposal that has been carefully assessed and recommended for approval by officers may be overturned for what appears to be unsubstantiated or insignificant reason. In addition, it was noted that some Members have little understanding of the costs of implementing certain changes and conditions, with significant additional cost being added to a development due to comments from individual Members. The opportunity to speak at Committee was also commented upon with the 5 minute slot and inability to respond to assertions or comments made by others (including Members) during the decision making consideration of the application seen as inadequate for the applicant to state his or her case, especially for large scale and complicated developments which may have taken many months and much cost for the applicant to discuss with officers and take through the required processes.

#### 7.10 Park Purposes

The fact that the scrutiny investigation is focused on the impact that the National Park Authorities have on their local economy brings the question of how the Authorities' purposes sit alongside their duty into sharp focus. This is given even more relevance by the current Review of Designated Landscapes in which the possibility of giving greater weight to the economy is being mooted and for which the three Welsh National Park Authorities have given their support.

It was a natural part of the Committee's investigations therefore to seek the views on this issue of all those with whom contact was made. Without exception all business who were contacted on this question gave their wholehearted support for changing the present approach to one of giving parity to the socio economic impacts of the Authorities' policies and activities alongside the current environmental and experiential purposes – indeed a number expressed surprise that this was not already the case. Another pointed to the Bluestone decision

which the Authority approved but which was subsequently challenged in the High Court. The High Court Judge ruled that PCNPA's grant of planning permission for that part of the Bluestone development that lies within the National Park was lawful. Part of his reasoning as to why the decision was lawful relied on the fact that Members had concluded that the economic benefits to the area from allowing this development outweighed the policy considerations or fear of harm to this part of the National Park, but that as they had full information before them Members were entitled to exercise their judgement in this way. The Appeal Court and House of Lords upheld the High Court judgement.

It should also be said that while there is a widespread view that greater attention needs to be given to the National Park Authorities' impact on the economy it is also accepted by the majority that when it comes to an irreconcilable conflict between the environment and the economy the Sandford Principle should prevail. However, the fact of parity between the different elements would, in many people's view, lead to greater effort to find workable solutions than is currently the case.

The Committee felt that the Review of Designated Landscapes provided an opportunity to redress the balance and noted that evidence provided by National Parks Wales and others to the Review made the case for a socio-economic purpose. There was concern that the report from the first stage of the Review appeared to link the economic purpose to cultural heritage only, rather than the overall needs of the economy within which the cultural heritage is but a part – all be it an important one. It is hoped that this issue will be resolved during the process of passing any legislation to change National Park Authority purposes. If not, the opportunity to address this issue runs the risk of being lost for another twenty years.

#### 7.11 Housing Provision and the Affordability of Houses

Comments and concerns on housing came up on a number of occasions especially in PCNPA, including the specific issue of the affordability of housing. On housing generally we were told that NPA policies in Pembrokeshire make it very difficult to obtain consent for market housing particularly in rural areas and this has an impact on businesses in a number of ways.

Those involved in the hospitality and tourism sector who rely on a seasonal influx of staff cite the lack of accommodation as one of the difficulties they face in recruiting suitable staff. Specifically in relation to Pembrokeshire Coast NPA small businesses in rural locations, often family based, have problems when they seek to convert or build new housing for themselves in support of expanding their business or retaining staff in the business and the area.

Politicians particularly expressed annoyance with the implementation of the PCNPA's policy on affordable housing and they and others pointed out concern with other policies such as PCNPA's Accessibility Policy.

## 7.12 Positive recognition

The very nature of a scrutiny review is to be drawn in to identify and make recommendations on what could be done better. Thus some of the submissions gathered have been critical and in some cases negative – as referenced in some of the analysis above.

However we were also told of many good, indeed excellent, things that the National Park Authorities do and the very positive impact that these can, and do, have on the economy.

Tourism bodies for example laud the Authorities for the way in which they have performed against the economic goals identified within the National Park Management Plan and the Local Development Plan of creating and maintaining a diverse, viable and sustainable local economy and also attracting a sustainable number of people at all times of the year to enjoy the special qualities of the National Park – very much in line with our purposes. Often the greatest recognition and praise comes from the personal contact with individual officers on the ground and we were given many examples of the close and valued relationship that many of our staff have with individuals and businesses in our National Parks and that they are seen to be fantastic and passionate ambassadors for what is held dear about the National Parks – well maintained landscapes, protected environments, access and enjoyment.

## 7.13 Employment Opportunities

A number of businesses, and certainly the politicians, expressed concern at the lack of work opportunities in the county which encouraged young people to move elsewhere for employment and a career. Alongside this are examples of the difficulties that some businesses have in recruiting suitable staff which then has a direct impact upon their business. NPAs are not unique in this respect and it appears to be an issue for rural areas.

We were also provided with statistics that demonstrated that, while the overall population of Pembrokeshire is showing a slight increase, the demographic profile shows an aging population as young people move away and older, maybe retired, people move in.

We are not alone, however; it is a problem for the whole of Wales. A recent report from the Institute of Welsh Affairs (“The Welsh Agenda”: Spring/Summer 2015 p20) stated in the context of Welsh GVA per head only being at 72% of the UK average, and not having changed in that respect since 1999; that in 2012-13 there was net emigration from Wales of 3,980 people aged 15 to 29 and net immigration of 2,430 people aged over 45. The author saw no solution coming from the free market to improve on this and therefore posed the question as to what should be done by the public sector to foster economic development.

## 8. Other Issues

During the review a number of themes that were not relevant to the area of the study were mentioned. We accept that we did not collect evidence from all relevant stakeholders to enable us to pass authoritative comment on these issues however, we note them, as follows, as they have value in guiding the NPAs in their engagement with other bodies who may be more directly involved in addressing them.

### 8.1 Specialist Skills

A theme that emerged with some of the larger and more expansionist tourism and hospitality sector businesses was the difficulties in obtaining staff with the right skill sets and attitudes. In particular there seems to be a problem, at least in Pembrokeshire, of recruiting chefs locally or indeed from within Wales. Despite businesses engaging with the local colleges their needs in this respect are not being met – which means such staff being sourced elsewhere in the UK or indeed from Europe – and when recruited have little loyalty to the employer or the area so turnover can be high.

### 8.2 Perceptions of Careers in the tourism industry

Another linked problem is that of the attitude of school leavers who do not see that tourism and hospitality is an exciting or worthwhile career which led one respondent to observe that the local schools have delivered a “lost generation” of young people into the job market; unenthusiastic and unskilled for the jobs that are available – and needed – in the tourism economy of the National Parks.

Some employers also felt that the education system is also failing to provide good quality graduates and that all too often they lack the level of literacy and communication skills required in the service sector.



## 9. Conclusions

- 9.1 While there was much evidence to suggest that the existence of National Parks and in particular the National Park brand did much to enhance certain sectors of the economy especially tourism and recreation, there remained some sections of the business community who felt that some National Park planning policies were inimical to economic development.
- 9.2 Of all the policies and actions undertaken by the National Park Authorities the Committee considers that land-use planning has the greatest impact on the economy within the National Parks. It also has the greatest negative perception, being seen as a potential barrier to economic growth; however, it could be argued that the planning process facilitates developments that are sustainable in the landscapes.
- 9.3 Very small businesses have a lack of capacity, understanding of and/or difficulty in engaging with the National Park Authorities.
- 9.4 There is almost universal approval of the value that the National Park Authorities add to the landscape in the National Parks and to the quality of life of those living within them.
- 9.5 There is a close and generally positive working relationship between farmers and the National Park Authorities.
- 9.6 Businesses change either out of choice or in response to market pressure and the impact of the economy. At times the changes may appear to be in conflict with National Park policies as well as national planning policies. Where such conflict is at a fundamental level involving National Park purposes then businesses need to be flexible in the way in which they seek to change. However there are circumstances where some policies had been drawn up in very different market and economic times and without revision and acknowledgement that circumstances have changed the policies fail their original purposes in supporting appropriate economic growth and development. What was appropriate 5 or 7 years ago may not be appropriate now.
- 9.7 The National Park brand is universally recognised as having high value and is a significant support to the marketing and performance of many businesses especially those in the hospitality and tourism sector.
- 9.8 There is very strong support for recognising the economy support role of the National Park Authorities alongside, and of equal status (subject to the Sandford Principle), to the existing two National Park Purposes.
- 9.9 Any such change of National Park Purposes will need to be matched with a re-prioritisation of resources and a shift in corporate focus to embrace the change effectively.

- 9.10 Businesses, especially those that do not have a close working relationship with National Park officers feel that National Park staff and Members do not sufficiently understand the business environment and therefore both the drawing up of policies and more particularly their implementation are often done without the needs of business being properly taken into account.
- 9.11 Currently, responsibility for economic development within the National Parks rests with Local Authorities, both in terms of statutory function and resources. However, NPAs do contribute to the economic well-being of the National Parks and there is a need for both Local Authority economic development departments and NPAs to work closer together. Given the likely advent of a new purpose to include the economy it is important to both find ways to do so and demonstrate that adequate resources and actions are delivered to boost economic development.
- 9.12 The quality, degree and level of contact as well as the subject and purpose of the contact is seen as important. A pragmatic approach to policy development and implementation should be encouraged across the board in NPAs from Member level to case officers.
- 9.13 In Pembrokeshire Coast NPA the current accessibility policy is considered to militate against the development of ordinary market (as against tourism rental or affordable) housing and can make it difficult for small, often family, businesses in rural areas to accommodate and retain staff.
- 9.14 There is a widely held and strong perception that the PCNPA affordable housing policy is not delivering a sufficient supply of affordable houses, making it more difficult to retain people in local, often very rural communities. However the policy was modified last year and the time lag between change and understanding and implementation may mean that the perception is behind what is actually happening (given that there would appear to be an increased and increasing number of applications which include affordable housing being submitted).
- 9.15 A thread running through all the comments made to us is that the National Park Authorities are valued very much for many things that they do very well – a lot of which comes from personal contacts with staff who are seen as embodying all that is good and positive about our National Park Authorities.

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- E.7 Pembrokeshire County Council's Cabinet Spokesman for Communities and the Voluntary Sector and PCC officers

F. Other relevant documents

## APPENDIX A

### Members of the Joint Scrutiny Committee

#### **Pembrokeshire Coast National Park Authority:**

Mrs Gwyneth Hayward (Chair)

Councillor Mike James

Councillor Bob Kilmister

Councillor Rob Lewis

Mr Ted Sangster

#### **Snowdonia National Park Authority**

Councillor Elwyn Edwards

Councillor Alwyn Gruffydd

Councillor Sion W. Jones

Councillor John MacLennan

Councillor Caerwyn Roberts

Councillor Mrs Elizabeth Roberts

Dr I ap Gwynn (Deputy Chair)

## APPENDIX B1

Organisations/individuals interviewed at the Pembrokeshire Coast National Park Authority's offices at Llanion Park, Pembroke Dock on the 11<sup>th</sup> March 2015

<b>Organisation</b>	<b>Representative(s)</b>
Pembrokeshire Coast NPA	Ms M Dunne, Head of Park Direction, and Mr G Meopham, Estates Officer
The Real Seed Catalogue, Newport, Pembrokeshire	Ms K McEvoy
Hean Castle Estate, Saundersfoot	Mr D Lewis
British Holiday and Home Parks Association	Mr H Pendleton
Wales Tourism Alliance	Mr C Osborne
Solva Business Forum	Ms B Prickett and Ms A Grimes
Federation of Small Businesses	Mr T Baron and Mr N Blockley

## APPENDIX B2

Organisations interviewed at the Snowdonia National Park Authority's offices at Plas Tan y Bwlch, Maentwrog on the 25<sup>th</sup> March 2015

<b>Organisation</b>	<b>Representative(s)</b>
George and Tomos Architects	Mr D Tomos
Farmers Union of Wales	Mr G Watkin
Meirionnydd County Farmers Union	Mr OG Thomas
Farmer, Llanfrothen	Mr E Roberts
National Trust	Mr R Evans
Plas y Brenin Mountain Sports Centre	Mr M Doyle
Yr Urdd, Glan-Llyn	Mr HA Edwards
The Outdoor Partnership	Ms T Evans

## APPENDIX C1

### Scrutiny Project - The impact of National Park policies and actions on SMEs

#### Interview Framework

1.	Please describe your business – what do you provide, in what market do you operate, your staff numbers, turnover, how long have you been in existence, how long on this site, key factors responsible for the success of your business....?
2.	Has your business received any support from the public sector over the past five years, i.e. grants, non-financial support?
3.	Your business is located in a National Park, where are your customers based? Do you have businesses and / or customers in more than one National Park?



4.	Have you ever had any formal dealings with the National Park Authority? If so please briefly describe them and their outcomes.
5.	How could the National Park Authority, in terms of its policies, better support businesses in the Park to prosper and expand?
6.	In your view/experience does the fact that you are located in a National Park benefit your business or not?

7.	Which of the following is most important to your business?:	
	Landscape	
	Nature	
	National Park status / brand	
	Recreation opportunities	
	Welsh language and culture	
	Area protected by planning	
	Quality of life	
	Other?	

## APPENDIX C2

### List of companies interviewed individually by Members

Anrhegion Gelert, Beddgelert  
Beddgelert Village Shop  
Bluestone Resort  
Brumwell Garden Machinery, Badgers Holt, Jameston  
Cae Du Designs, Harlech  
Cross Foxes, Brithdir, Dolgellau  
Fferm Porthtreuddyn, Pren-teg, Porthmadog,  
Golden Lion Hotel, East Street, Newport  
Harlech Toyota  
Lawrenny Yacht Station  
Min y Don Holiday Home Park, Beach Road, Harlech  
Ministry of Defence (MOD) Defence and Infrastructure Organisation service (Delivery Centre)  
Pathfinders  
Penrallt Ddu Farm, Dinas Cross  
Richards Brothers Bus Company, Newport  
South Hook, CHP  
St Brides Spa Hotel, Saundersfoot  
The Real Seed Catalogue, Newport  
Trewern Farm, Nevern  
Urdd Gobaith Cymru, Glan y Llyn

## APPENDIX C3

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
1.	<p>Ministry of Defence (MOD) Defence and Infrastructure Organisation – Business/Adventure Training Site.</p> <p>Established in 1974.</p> <p>Staff numbers: 57.</p> <p>Key factors for the success of the business are:</p> <ul style="list-style-type: none"> <li>• Ability to train in the National Park;</li> <li>• Good Community relationship;</li> <li>• A variety of weather and terrain which lends itself to the tri services training.</li> </ul>	No.	Yes, the tri services use the training resources in other National Parks. The customers are from all over the UK.	Yes, there have been several planning applications and environmental surveys. The outcomes have been successful. Presently there are a further 2 pending applications.	<p>As a customer, to facilitate training needs more fully by appropriate requests and permissions allowed, e.g.</p> <ul style="list-style-type: none"> <li>• The need for further discussion re. use of military uniform being allowed for training purposes on private land and for more specialist training.</li> <li>• The possibility of the NPA signing up to a declaration of intent with the MOD, in the same manner as other Park authorities.</li> <li>• Presently, working in partnership with the Park Wardens, Property Manager, Countryside and Access.</li> </ul>	<p>Yes,</p> <ul style="list-style-type: none"> <li>• In a key position geographically so easy to access all of the disciplines needed for MOD Training needs.</li> <li>• Wales is more of a hub for the MOD, as nearer than Dartmoor or Scotland.</li> <li>• Multi use of terrain, from mountains to lowlands, coast and lakes.</li> <li>• Easy access and landscape in particular with numerous training opportunities.</li> <li>• Access is very important, 'right to train', as a training facility</li> </ul>

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
						<p>we would do anything to preserve the right.</p> <ul style="list-style-type: none"> <li>• Closure of base in Germany, and subsequent re-location of staff to UK could be beneficial.</li> </ul>
2.	<p>A family business for about 11 years selling garden machinery. Turnover has dropped by 50% over past few years, mainly due to loss of sales of new machinery because of internet. Majority of customers are individuals but some contracts to supply and maintain equipment for e.g. PCC and caravan sites.</p> <p>Located in a rural area on edge of a small village – no passing trade.</p> <p>Business employs the owner's two sons, one full time, one part time but on low levels of remuneration. The business is not sustainable and has limited opportunity to expand. Proposal to create high quality 'glamping' holiday site as another source of revenue to complement existing business.</p>	<p>No financial support other than business rates relief. Attended some WG sponsored training courses on IT which was useful and a business management course that was less so.</p>	<p>Customer base covers whole of Pembrokeshire and West Carmarthenshire.</p>	<p>3 formal dealings with planning process, trying to expand and diversity business. An initial application to develop a glamping site was turned down by officers. Then modified to take account of stated reasons for refusal and this was successful.</p> <p>Part of the difficulty experienced caused by his inability to get a straight answer from statutory consultees e.g. Environment Agency (now NRW) as site in a</p>	<p>Small businesses at a disadvantage due to lack of experience and limited availability of advice. Agent wasn't always sufficiently knowledgeable. He accepted the need for rules but felt them to be too rigid and too rigidly enforced, also not always even handedly applied to small businesses compared to larger developments which were accommodated more. His application was originally refused due to the site being visible from parts of the surrounding area,</p>	<p>No because of the difficulties faced in obtaining planning consent in order to be sustainable.</p>

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
				protected zone for water. PCNPA Tree Officer more helpful and meant he understood the reasons for concerns and enabled him to accommodate them.	however a number of wind turbines much more visually intrusive – seemed unfair.  Park needed to be more flexible. Useful if officers could spend time working in a small business to understand the pressures.	
3.	Project to build and operate a 500MW gas powered power station with connections to the National Grid. Cost of project around £600m. Once operating will employ around 30 full time and 90 in the supply chain.	No.	Electricity supplied to National Grid through Pembroke Power Station, possibility of private supply to industrial users in area.	Close working with Park through planning application for project even though decision by SoS for Energy and Climate Change. A new process, not applied in Wales previously. PCNPA advised closer engagement, and there was active working between officers, the applicant, their advisors and statutory consultees. A level of expertise developed which was used by other Authorities and this earned a great deal of credibility with applicant. Officers also firm in dealing with	Positive experience, Head of DM very involved and played an influential and positive role. The Authority gained a lot of credit from developers and government as a result.  Weakness: Authority lacks expertise in depth and when the officer left the Authority no one could fill that gap and therefore no longer participates with same level of understanding.  Also claim for over £4m for housing construction workers, alongside a PCC	No relevance.

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
				<p>objectors.</p> <p>Having received consent, it was announced that because of market conditions, the project was now on hold. The development team had therefore been trimmed down, but some work was still needed on some of the conditions so that they could be satisfied in the event of the investment being authorised in future.</p>	<p>demand for £2.3m for road and path improvements felt to be unjustified and exploitative. The demand was felt to be naïve and the Authority would have been better served by engaging commercial negotiators. This was felt to be a problem with the public sector mind-set.</p>	
4.	<p>Milk producing farm supplying a cooperative. Employ 1 full time and 2 part time, depending on contracting. Farming for 45 years, success is dependent on the weather and market prices.</p>	<p>The Single Payment. A permanent fence also erected along the top of the cliff in conjunction with National Park and British Climbing Club.</p>	<p>Hope that residents of the Park order produce. Local farmers buy calves as breeding stock.</p>	<p>As noted – fence erected.</p>	<p>Support for maintenance of walls and traditional buildings.</p>	<p>Yes on the whole.</p>
5.	<p>Shop selling food, alcohol, tobacco and domestic sundries. Bought in 2012 and since gained agreement to offer post office services, newspapers and lottery in the</p>	<p>Non-financial support to start up business e.g. help to draw up</p>	<p>Customers are locals, tourists and visitors who stay in rented houses.</p>	<p>Planning application for modifications to the building. Pre-application advice service a waste of</p>	<p>Feel that small businesses do not receive same level of support and assistance from Officers.</p>	<p>Absolutely not. Angry and frustrated at process. Cost</p>

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
	shop. Turnover increased by 40%. Employ 5 members of staff, 3 full time, 2 part time. Shop has local support also the village is a tourist attraction.	business plan and applications for funding.  PODF Grant to diversify business after securing contract with Post Office.	Also passing trade – the ability to park outside the shop for a short time is an advantage.	time. Application initially refused but eventually approved at an Authority meeting.  Supporting the visitor Centre in the village, however disappointed at Authority cuts to marketing and possibility of closure/reduced opening hours of Centre.	Publication of clear policies to help understand what is required. A need to work with small businesses and listen to them.	thousands of pounds and constantly expected to compromise plans. No flexibility without further applications = cost.  Tourists are essential, so closure of the Visitor Centre would be a negative impact.
6.	Residential Activity Centre – indoor and outdoor activities. 60 staff (about 40 FTE).  Established 1950. Success due to location and link to Urdd Gobaith Cymru.	Rebuilt dining room with European and Welsh Government funding. Also refurbishment of the Plas from Cronfa Cyfartar Fund.	Customers mainly from Wales. A smaller centre operates in Pembrokeshire.	<ul style="list-style-type: none"> <li>• Good relationship with Wardens;</li> <li>• Some funding from Authority through Snowdonia Excellence Fund;</li> <li>• Some problems extending Llwybr Tegid due to Archaeology;</li> <li>• Action needed at Bala Lake as it is filling with mud and this threatens the Centre's activities.</li> </ul>	No comments to make.	<ul style="list-style-type: none"> <li>• Clear benefits in relation to outdoor environment;</li> <li>• Advantages of being able to market a location within the Park.</li> </ul>



	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
7.	<p>112 static and 100 touring pitch caravan site.</p> <p>Employ 10 staff and 1 Apprentice – most have attended World Host Tourism training course.</p> <p>Site purchased in 2002 and redeveloped with new signs, sewerage system, electric, landscaping etc.</p> <p>Good relationship with staff from planning department and local Councillor played a major part in success.</p>	No.	<p>Due to its quality, attracts people from all over UK (the northwest, midlands and mid-Wales) and overseas. There are sister Parks also within the National Park which are currently being refurbished.</p>			
8.	<p>An hotel aiming to cater for all, providing high quality locally produced food. Good quality modern accommodation. Welcoming staff. Good reputation in Wales.</p> <p>Employs 25 -40 staff depending on season. Owner bought business in 2000 when it was well established but outdated.</p> <p>Success of business due to recognising needs of current market both local and visitor through high quality staff, good atmosphere, a balance between a traditional pub and a modern restaurant and quality food, beer, and accommodation.</p>	<p>No.</p> <p>Local TIC does provide details of local hotels and restaurants.</p>	<p>Customers drawn from all over Pembrokeshire and UK. Significant numbers from other Welsh National Parks.</p>	<p>Main contact through planning system. A marquee erected without planning permission – conflict between need of business to attract customers and protection of the Conservation Area. Owner found officers to be realistic and helpful and a compromise was reached, however the process was expensive and the organisation seemed unapproachable initially. Therefore helpful</p>	<p>More emphasis should be placed on ways in which the private sector could help the prosperity of the area. Hospitality industry is crucial to this and policies should seek a greater understanding. Policies need to be more amenable to change.</p> <p>More information on what was acceptable should be provided as well as opportunities for Members to gain a greater</p>	<p>Yes, mentioned in promotional information.</p>

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
				to have more accessible information and officer contact.	understanding of the industry and the issues facing it.	
9.	<p>Company selling seeds to home gardeners. Employ 5-6 staff. In existence since 1998 when it was based in Spain and it then moved to Cambridge. Operating from its current location since 2002.</p> <p>Grow half of seeds, rest bought in. Recent problems with economy had little impact – attributed to an older market, established customers and product being relatively cheap and affordable. Been a growth in internet sales.</p> <p>Offer a personal service, and have reached the optimum size, aiming now to consolidate their business.</p>	No direct grant or subsidy. Welsh Government and County Council very helpful.	Business is UK wide, including other National Parks.	Main contact through planning which was not a great experience. Found process lacked transparency, no continuity of officers. Felt to be unfavourable compared to similar applications in Cambridge, but did concede it was a National Park.	National Park should have a more open minded view of what businesses need. Too much emphasis on large scale businesses, when overall small businesses employ significant numbers of people.	Little impact on business.
10.	<p>A bus and coach company providing a range of services e.g. local bus service, school contracts, tours and excursions (both UK and abroad), private hire and airport service.</p> <p>Employ 100 permanent staff with occasional part time employees, but this latter is complicated by Welsh Government requirements regarding training.</p>	No grants, but benefit from Welsh Government and County Council subsidies as well as support for local coastal bus service. Local TIC used for advertising.	Predominantly based in Pembrokeshire, south Ceredigion and Carmarthenshire, but also have a broad geographical customer base including a regular	Limited formal dealings beyond TIC and coastal buses. Historically planning department involved in modernisation of current site, and this is remembered as a positive experience.	Tourism significant to company's success so policies to protect the National Park and prevent over development through the planning system are considered important.	National Park significant to tourism sector in the area.

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
	Company founded in 1930s by the grandfather of current directors and is still wholly family run. Success attributed to diversity of service, reliable, predictable and efficient service.		weekly contract to collect children from London for a local attraction. Some tours visit other National Parks.			
11.	Yacht Station providing accommodation (80 static caravans, pitches for 10 tents, 4 holiday flats and chalets), slipway, two pontoons allowing access to waterway, 85 swinging moorings, 100 land based bays for boat storage, public house, cafeteria and recreational opportunities. Owned site for over 25 years, provide good quality service with easy access to the water.	No.	Most customers from the Valleys, Cardiff, Newport and Hereford, also small number from England.	Mostly on planning matters. Straightforward matters resolved swiftly and successfully, but more ambitious proposals for expansion and diversification not always successful.	Policies should be more supportive of businesses. They rightly apply weight to protecting the environment but this can be detrimental to businesses that need to grow. Increasing employment opportunities in rural locations should be given more weight when assessing applications. Businesses wishing to spend money in the Parks are being restricted too often.	Definitely beneficial when advertising.
12.	Hotel and related business – owners both have a background in the hospitality sector as trainees and managers in major hotel chains and have worked all over the world. Bought an old fashioned seaside hotel in 2000 with a vision to develop it. Initially refurbished for weddings and events then	Significant funding support in early stages of hotel purchase and development.  Also support from	Customers could be categorised as corporate (meetings and conferences), leisure and business travellers.	Dealings with planning officers through all stages of development. Found them to be supportive and a good friend to the project. Advice was to engage with the planners	Greater consistency of interpretation of policies by officers can make things difficult for businesses. Some officers are understanding and decisive, others are	Certainly does. Walking in the National Park is an attraction for many customers. Events such as Ironman are important and

	<b>Description of business</b>	<b>Public Sector Support?</b>	<b>Where are customers based?</b>	<b>Any formal dealings with the National Park Authority?</b>	<b>How could the National Park Authority better support businesses in the Park?</b>	<b>Does the fact that you are located in a National Park benefit your business or not?</b>
	<p>developed as a 4* boutique spa hotel that delivered 5*. Currently 34 rooms and 6 two bed apartments.</p> <p>Market has changed and they have had to be flexible – more online booking, rather than travel agents. Don't do Christmas parties or many weddings as these interfere with core clientele.</p> <p>Currently employ around 60 staff year round, rising to 90 in the summer at their three businesses. Provide key worker accommodation as there is a shortage of accommodation for staff from outwith the area. Have tried to employ locally, working with Pembrokeshire and Carmarthenshire Colleges offering apprenticeship training but British young people don't find Pembrokeshire attractive preferring the bright lights of the cities. Also UK graduates want to move straight into management positions, so they have recruited students on placement from Austria and France.</p>	<p>the Village's Chamber of Tourism and Harbour Commissioners.</p> <p>Positive and active support from County Council who have clear economic development strategy. The National Park Authority were described as reactive with little understanding or vision of what businesses required and how they could be supported.</p>		<p>very early. Currently in discussions with the planning department on other matters.</p>	<p>the opposite. Businesses prefer to know where they stand and then work together to try and find a solution, rather than awaiting a response.</p> <p>Greater involvement in economic development by the NPA is needed. Should be active and supportive like the County Council. Economic needs should be considered alongside environment and conservation.</p>	<p>credit is given to the Authorities for their support for such events.</p>
13.	<p>Short break destination – current capacity is 1350 but new phases of development will increase capacity to 1800 – 1900. Occupation target is 97%. In 8<sup>th</sup> year of operation, with 500+ employees as a mix of full and part-time. Most staff local – South</p>	<p>Grants received from various organisations. Works closely with Visit Wales.</p>	<p>Current market within 4 hours drive time. No business in another National Park yet.</p>	<p>Most dealings on planning issues. Relationship has improved. The pre-app process seen as good.</p>	<p>The NPA needs an economic purpose.</p> <p>Needs to be more joined-up thinking between organisations.</p>	<p>Yes.</p>

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
	<p>Pembrokeshire, Carmarthenshire and Ceredigion.</p> <p>Key factors for success: owner and the team, the location, persistence. The staff are a credit. Also standard of accommodation. 44% of visitors come for 'wellness and wellbeing'. Marketing has to focus on pre-school age families. Swimming pool is important factor.</p> <p>Visitors visit destinations outside of the holiday park.</p> <p>Constructing bigger lodges and four 12 bed corporate lodges to focus on interactive team building experience. New development will bring in additional 200 cars and result in more jobs. High turnover of housekeepers.</p>			<p>Would be useful if relationship was more proactive in respect of what businesses could do and where they could expand.</p> <p>Some training initially provided on what the National Park was about – this should be revisited. Also like to do volunteering for beach cleans.</p>		
14.	<p>An Inn with Rooms. <i>Visit Wales</i> 5 Star Inn. Comfortable place to stay, Meeting rooms.</p> <p>15 staff (20 in the summer).</p> <p>6<sup>th</sup> year since reopening.</p> <p>Influences: Location near trunk roads and visitor attractions nearby with whom they work.</p>	Support from <i>Visit Wales</i> towards the renovation.	70% of customers are from outside the National Park. The Park brand is important when marketing.	<p>Yes, when planning the redevelopment. Compliance issues have arisen, but no problem with the way in which the officers have dealt with the issue.</p> <p>Would like to develop a more proactive working relationship with</p>	No specific comments.	Significant benefit. Its walkers' package is becoming more popular. The location is key to that.

	Description of business	Public Sector Support?	Where are customers based?	Any formal dealings with the National Park Authority?	How could the National Park Authority better support businesses in the Park?	Does the fact that you are located in a National Park benefit your business or not?
				Wardens.		
15.	<p>A 600 acre dairy farm with approximately 600 cows. The farm sells raw milk for the liquid milk and this is transported to London by local tankers. The farm employs 11 people, 7 of whom are full time. The family has owned the farm since 1984 and it has been modernised in recent years.</p> <p>This farm attributes its success to a laissez faire approach to market conditions which allows them greater flexibility in responding to changes in the economy.</p> <p>They are an important contributor to the local economy and estimate that they are involved with approximately 80 local businesses.</p>	The business receives an E.U. subsidy, the Single Payment Scheme and receives advice from the Welsh Government in the form of support schemes.	UK wide.	Mainly with the Planning Department. These have been successful and they found the experience to be positive due to good pre application discussion which resulted in a clear understanding of the main issues involved. They employ Agricultural Consultants to advise them on planning matters.	<p>In terms of support for business their main concerns were:</p> <ul style="list-style-type: none"> <li>• Affordable housing for their employees</li> <li>• The need for a Farm Liaison Service which would provide clear information on key matters which concern Agricultural businesses within National Parks e.g. the disposal of slurry, use of derelict farm buildings and new developments in farming methods.</li> <li>• Lack of clarity on National Park policy on renewable energy schemes.</li> </ul>	Not a benefit nor a hindrance.
16.	<p>Company selling and servicing cars and aiming to present best possible service.</p> <p>Ten staff employed.</p> <p>16 years on current site.</p>	No.	Most of county, plus visitors in the summer season. No customers in other National Parks.	Planning application to build a new site for the business, which was all achieved successfully.	Asking businesses what their problems are, and whether it's possible to provide support.	No.

	<b>Description of business</b>	<b>Public Sector Support?</b>	<b>Where are customers based?</b>	<b>Any formal dealings with the National Park Authority?</b>	<b>How could the National Park Authority better support businesses in the Park?</b>	<b>Does the fact that you are located in a National Park benefit your business or not?</b>
17.	<p>Interior design business working in the main with private customers, but also some hotels and B&amp;Bs.</p> <p>Owner manages businesses with a team of outworkers who also work for themselves.</p> <p>Been in business for 20 years, with last 4 on current site.</p> <p>Business provides niche market, with good customer service and quality product.</p>	No.	Customers are from a wide catchment area. Some may be located in other National Parks, but not specifically.	Prior to moving to current location, planning permission granted for conversion of two outbuildings from which shop was run.	Unfamiliar with specific NPA policies, but feels that businesses should be supported where possible, e.g. help with marketing to make it a year round destination. Would also help if TICs were open all year round.	No difference.
18.	Countryside management/public access advisory service, employing 10-12 staff depending on demand and in existence for 28 years. Success due to quality and dependability.	No.				No.
19.	Gift, sweet and toy shop with two flats above for visitors. Husband and wife run shop and employ part time staff when busy. In business since 2003. Success depends upon weather and also the environment of the village.	No.	No.	A planning application to change the house to a flat and it was permitted.	Road improvements by the Council without impediment from the NPA. Consistency in the planning system.	Yes.
20.	600 acre farm employing 6 f/t (includes family) and 6 p/t staff. 700 livestock – dairy and beef. Present owner is 5 <sup>th</sup> generation	Single farm payment and management	Business outside National Park	Good relationship with Warden Team and ecologist. Negative	More emphasis on farming, less on tourism. Bridleways less used now	No benefit, negative due to planning

	<b>Description of business</b>	<b>Public Sector Support?</b>	<b>Where are customers based?</b>	<b>Any formal dealings with the National Park Authority?</b>	<b>How could the National Park Authority better support businesses in the Park?</b>	<b>Does the fact that you are located in a National Park benefit your business or not?</b>
	and been farming since 1982. Success due to good grassland.	agreement with NPA for 25 years.		experience of planning service – applications refused. Also poor pre-app advice. Feel authority intimidated by o/s interests and too close to the Friends of the National Park.	than ever.	



## APPENDIX D1

### JOINT SCRUTINY COMMITTEE 21<sup>st</sup> February 2014

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward, Councillor DGM James and Councillor B Kilmister.

Officers: Mr T Jones, Chief Executive and Mrs J Evans, Administration and Democratic Services Manager.

Snowdonia National Park Authority representatives:

Members: Councillor A Gruffydd, Dr I ap Gwynn, Councillor S Jones (in place of Councillor E Edwards), Councillor C Roberts and Mrs E Roberts.

Officers: Mr A Phillips, Chief Executive, Mr I Jones, Director of Corporate and Legal Services, Mr J Cawley, Director of Planning and Cultural Heritage, and Mr E Williams, Director of Land Management (Chief Executive elect).

(Canolfan Rheidol, Aberystwyth: 10.00a.m. – 12.45p.m.  
and 1.15p.m. – 1.50p.m.)

#### 1. Election of Chair

It was **UNANIMOUSLY AGREED** that Mrs G Hayward be elected Chair of the Joint Scrutiny Committee.

#### 2. Election of Deputy Chair

It was **UNANIMOUSLY AGREED** that Dr Iolo ap Gwynn be elected Deputy Chair of the Joint Scrutiny Committee.

#### 3. Apologies

Apologies for absence were received from Councillor RM Lewis and Mr AE Sangster (Pembrokeshire Coast National Park Authority), and Councillor E Edwards (Snowdonia National Park Authority).

#### 4. Disclosures of interest

No disclosures of interest were received.

#### 5. Scrutiny in the National Park Authorities

Mr T Jones stated that, as Members would be aware, the National Park Authorities (NPAs) operated different models of governance to the

county and county borough councils and, as such, the scrutiny process implemented by those authorities could not be adopted by the NPAs.

In light of this, and in an effort to identify an effective scrutiny process that could be introduced into the work of the NPAs, both the Pembrokeshire Coast and the Brecon Beacons NPAs embarked on a joint scrutiny project, with Snowdonia NPA taking a watching brief on how the project progressed. The Centre for Public Scrutiny was also involved and provided a number of training sessions aimed at developing the scrutiny skills of those Members taking part. Two scrutiny reviews were also undertaken during the life of the project, one being on the effectiveness of the Sustainable Development Fund in helping to establish low carbon communities, while the second focused on the value and effectiveness of public rights of way.

Mr Jones outlined to Members how the process had been developed and evolved as a result of the project, emphasising the need to plan carefully, to ensure that all available information was to hand before interviewing expert witnesses and, most importantly, to ensure that the review was manageable within a reasonable timeframe.

Questions were asked of the Pembrokeshire Coast Members involved with the scrutiny project with the Brecon Beacons and clarification was sought from officers on a number of points.

Following a discussion, it was **AGREED** that the process outlined by Mr Jones be utilised to undertake the joint scrutiny review in hand.

## **6. Scoping exercise**

Mr T Jones reminded Members that they had been charged by their respective Authorities to undertake a joint scrutiny review in connection with the socio-economic duty of National Park Authorities (NPAs). The exact remit of the review was to be determined by the Joint Committee that day.

To help Members determine the subject matter for the review, Mr Jones suggested that they use the Scoping Proforma that had been devised during the previous joint scrutiny project between the Pembrokeshire Coast and Brecon Beacons National Park Authorities. Members agreed it would be a useful tool and then set about agreeing the specific topic area and a general way forward.

A lengthy discussion ensued where Members concluded that it would be extremely beneficial to gather evidence as to whether existing policies supported sustainable communities. However, in order to keep the review manageable, it was considered that the work should be limited to

one specific topic area – micro businesses. It was also considered necessary to secure baseline data from the outset and that this could be carried out by an independent party, e.g. Bangor University.

It was **AGREED**:

- (a) that a review be undertaken to establish how successful National Park Authority policies and work were in supporting job creation in micro businesses;
- (b) that Dr I ap Gwynn, Mr T Jones and Mr A Phillips agree a brief to be submitted to an independent party (e.g. Bangor University) for the securement of baseline data on micro businesses within and immediately adjoining the three Welsh National Park Authorities;
- (c) that Mr A Phillips liaise with Arup Consultants in relation to information that has already been collected concerning micro businesses within and immediately adjoining the three Welsh National Park Authorities;
- (d) that representatives from the under-mentioned organisations/bodies, together with a selection of individuals from the sectors referred to below, be invited either to present or submit written evidence to the Joint Scrutiny Committee:

Constituent County Councils (Local Authority Business Advisory Services);

Businesses in the National Parks who have experience of the planning process;

Farmers in the National Parks, particularly those who have diversified their business;

Federation of Small Businesses;

Farmers' Union of Wales, National Farmers' Union and the Country Land and Business Association;

Town and Community Councils;

Chambers of Trade;

Planning agents;

Rural Development / Tourism Partnerships, including Visit Wales;

Licensed Victuallers' Association;

Outdoor Charter Groups;

Young Farmers' Club and Youth Councils;

Community Groups, and

Welsh Government (in connection with broadband infrastructure)

- (e) that the next meeting be arranged for April 2014, and
- (f) that the scrutiny review be completed by autumn 2014.

## APPENDIX D2

### JOINT SCRUTINY COMMITTEE 17<sup>th</sup> September 2014

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward (Chair), Councillor DGM James, Councillor RM Lewis and Mr AE Sangster

Officers: Mr T Jones, Chief Executive

Snowdonia National Park Authority representatives:

Members: Councillor A Gruffydd, Councillor S W Jones, Councillor J MacLennan and Councillor C Roberts.

Officers: Mr E Williams, Chief Executive, Mr J Cawley, Director of Planning and Cultural Heritage and Mr G I Jones, Director of Corporate and Legal Services.

(Meeting by Video Conference 2.00pm – 3.00pm)

#### 1. **Apologies**

Apologies for absence were received from Councillor B Kilmister (Pembrokeshire Coast National Park Authority), and Councillor E Edwards and Dr I ap Gwynn, (Snowdonia National Park Authority).

#### 2. **Disclosures of interest**

No disclosures of interest were received.

#### 3. **Minutes**

The minutes of the meeting held on the 21<sup>st</sup> February 2014 were presented for confirmation and signature.

It was **RESOLVED** that the minutes of the meeting held on the 21<sup>st</sup> February 2014 be confirmed and signed.

#### 4. **Confirm the Scope of the Review**

The Chairman reminded the Committee that at the previous meeting, it had been agreed “that a review be undertaken to establish how successful National Park Authority policies and work were in supporting job creation in micro businesses”. Since the meeting a number of Members had reflected upon this and had expressed the view to her that

this was too limited in scope; she therefore sought the views of the Committee as to whether the scope of the review should be widened.

Initially some Members were concerned that widening the project would make it too big to implement, especially given that slippage had already occurred, and that the brief should remain as agreed previously. They were keen to stress the importance of small businesses to the National Park and that the Authority's welcomed their expansion into bigger businesses. However other Members were of the opinion that a concentration on microbusinesses could give a distorted view, although agreeing that they were an important element within the National Park, medium sized businesses could have a bigger economic impact. A better sample would therefore be obtained if a wider range of businesses were considered.

It was suggested that it might be helpful to define what was meant by small, medium and large in terms of numbers of employees and this was agreed as small (micro) being under 10, while a SME (Small and Medium sized Enterprise) was up to 250. It was noted that there were few businesses of over 250 employees within the National Park, however there were quite a number with more than 10, particularly those which employed part-time staff.

It was **AGREED** that the scope of the scrutiny review be broadened to include all small and medium sized enterprises.

The Chairman then pointed out that at the previous meeting a title for the Committee had not been agreed. "The National Parks Joint Scrutiny Group on the Economy" was suggested and it was **AGREED** that the Chief Executives of both Authorities finalise a mutually acceptable title.

## **5. Possible Interview Framework**

The Chairman suggested that the Interview Framework circulated with the agenda be used as a basis for each Member to interview 3 businesses, and that the data collected be used a basis of evidence for the scrutiny review.

One Member questioned whether this would provide sufficient data, however it was pointed out that as this was qualitative data, rather than hard statistics, information from 30 businesses would be reasonable. It was hoped that a wide variety of business sectors would be covered, as well as those established 10 years or more ago as well as more recently, and it was **AGREED** the Members provide their lists of proposed interviewees to their respective Chief Executives so that this could be ensured.

It was also **AGREED** that some changes be made to the list of questions, with the inclusion of an additional question regarding the effects of businesses on the Welsh language, with this being formulated by the Chief Executives in consultation; also the first question be amended to establish whether the businesses had received any assistance, and from what sources and to ask about their access to broadband.

## 6. Evidence Providers

The Chairman asked whether the Committee was happy with the list of evidence providers discussed at the last meeting and set out in the minutes. It was agreed that all remained relevant however it was proposed that Councillors who had Wards in the National Park could be included and that in order to further explore the issues surrounding broadband provision, information could be sought from BT or Welsh Government Officers. It was also suggested that it might be interesting to meet with the Minister for Economy, Science and Transport. Other Members felt that it was not appropriate to invite the Minister to what was a Scrutiny Committee, and it was **AGREED** that County Councillors, BT and Welsh Government Officers be included in the list, but that a presentation to the Minister would be considered once the scrutiny report had been completed.

The Chairman then sought Members views as to which organisations would be invited to give evidence to the Committee and from which written evidence would be sought. It was **AGREED** that Members first undertake their interviews with local businesses, and that this take place before the end of October, before the Committee then met again in Aberystwyth to go through the evidence collected and to decide on a way forward.

## 7. Date of Next Meeting

It was **AGREED** that officers would agree a date for the next meeting hopefully in November, once all the outstanding issues had been resolved and Members had carried out their evidence gathering interviews.

There being no further business, the Chairman thanked everyone for their participation in the meeting.

## APPENDIX D3

### THE NATIONAL PARKS JOINT SCRUTINY GROUP ON THE ECONOMY 30<sup>th</sup> January 2015

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward (Chair), Councillor DGM James and Mr AE Sangster.

Officers: Mr T Jones, Chief Executive.

Snowdonia National Park Authority representatives:

Members: Councillor A Gruffydd, Dr I ap Gwynn, and Councillors C and Mrs E Roberts.

Officers: Mr E Williams, Chief Executive, Mr J Cawley, Director of Planning and Cultural Heritage and Mr GI Jones, Director of Corporate and Legal Services.

(Meeting by Video Conference 2.00pm – 3.10pm)

#### 1. **Apologies**

Apologies for absence were received from Councillors B Kilmister and RM Lewis (Pembrokeshire Coast National Park Authority), and Councillors E Edwards, SW Jones and J MacLennan (Snowdonia National Park Authority).

#### 2. **Disclosures of interest**

No disclosures of interest were received.

#### 3. **Minutes**

The minutes of the meeting held on the 17<sup>th</sup> September 2014 were presented for confirmation and signature.

It was **AGREED** that the minutes of the meeting held on the 17<sup>th</sup> September 2014 be confirmed and signed.

#### 4. **Face-to-face discussions: results**

The Chairman referred to the results of those face-to-face discussions that had taken place to date, and thanked the Members involved for taking the time to carry them out. She was of the opinion that quite a lot of useful information could be taken from the 'interviews'. Mr AE Sangster agreed, saying that some themes could be identified, namely:

- the involvement of the planning process;
- the fact that contacts and processes were important to people;
- very small businesses appeared to have a lack of understanding of and/or difficulty in engaging with the National Park Authorities;
- almost universal approval/support of the value National Parks added to the landscape and those who lived in the Parks.

The question was raised by Dr I ap Gwynn as to how the information gathered was to be used; whether for internal use or for wider external circulation. He contended that the limited number of businesses/areas of industry interviewed was not wide enough, and could be considered as being too subjective – or even biased – in its approach, which could lead to criticism of any eventual findings.

Mr T Jones responded by saying that the scrutiny exercise was intended to provide the Authorities with an insight into how successful current National Park policies were, and whether these needed to be redefined in any way. He reported that previous Scrutiny review undertaken by the Pembrokeshire Coast National Park Authority (whether in partnership with the Brecon Beacons National Park Authority or on its own) had followed the same format, and some of the evidence gathered was not flattering. However, the outcome of those reviews had resulted in changes being made, which would improve the Authority's way of working. The fact that only a small sample of businesses was being targeted should not be discarded as bringing no value to the current review process.

The Chairman also reminded Members that the National Assembly for Wales continuously looked at itself and the way it operated. Because the Authorities were undertaking this investigation themselves did not render the review invalid. They were creating a body of knowledge about attitudes towards National Park economic policies.

Councillor Mrs E Roberts welcomed the fact that 'service users' were involved in the process. She referred to the Future Generations Bill, which focused on the citizen centred approach. Mr T Jones reported that the Brecon Beacons National Park Authority had developed their Scrutiny process to involve members of the public in their reviews. This was welcomed by Members as a way forward for future Scrutiny reviews.

## **5. Responses received from 'umbrella bodies'**

The Chairman reported that responses had been received to date from the National Farmers' Union, the Country Land and Business Association, and Pembrokeshire Tourism. Reminders would be sent to those other 'umbrella bodies' that had been contacted to see whether



they wished to provide a written response or whether they would rather meet the Committee to discuss issues.

Snowdonia National Park Authority Members suggested contacting some 'umbrella bodies' in their area, and the Chairman asked that all written responses should be received by the end of February 2015.

## **6. Additional evidence**

The Chairman stated that the Pembrokeshire Coast National Park Authority Members had met with officers and Members from Pembrokeshire County Council to discuss their respective economic approaches. This had proved a very useful session, and Mr E Williams stated that he would arrange a similar session with Gwynedd County Council.

Members also considered that oral evidence should be invited from a number of sectors, including tourism, agriculture, retail/chamber of commerce and outdoor pursuits. It was suggested that two sessions be arranged, one in Pembrokeshire and the other in Snowdonia, and relevant organisations/bodies invited to attend to give evidence. It was also suggested that Assembly and/or Parliamentary Members be invited to give evidence, particularly as they were the people businesses approached if they had a problem.

It was **AGREED**:

- (a) that two meetings be arranged, in the respective National Park areas, and that organisations/individuals identified be invited to give oral evidence to the Committee,
- (b) that Members approach their constituent Assembly and/or Parliamentary Members to provide evidence.

## APPENDIX D4

### THE NATIONAL PARKS JOINT SCRUTINY GROUP ON THE ECONOMY 11 March 2015

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward (Chair), Councillors DGM James, B Kilmister and RM Lewis and Mr AE Sangster.

Officers: Mr T Jones, Chief Executive.

Snowdonia National Park Authority representative:

Member: Councillor A Gruffydd,

(NPA Offices, Llanion Park, Pembroke Dock: 10.00am – 12.35pm and  
12.55pm – 3.50p.m.)

#### 1. Apologies

There were no apologies for absence.

#### 2. Disclosures of interest

No disclosures of interest were received.

#### 3. Minutes

The minutes of the meeting held on the 30 January 2015 were presented for confirmation and signature.

It was **AGREED** that the minutes of the meeting held on the 30 January 2015 be confirmed and signed.

#### 4. Questioning Arrangements

The Chairman reminded Members that a suggested list of questions had been circulated to the Committee and these had also been sent to those who had been invited to give evidence to help them in their preparation. Members discussed who would ask each question and the order in which they would be asked.

#### 5. Presentations and Evidence

##### a) Ms Martina Dunne, Head of Park Direction and Mr Gary Meopham, Estates Officer, Pembrokeshire Coast NPA

The Chairman welcomed the first group to provide evidence to the Committee. Mr Meopham explained that as Estates Officer his core

responsibility was to manage the Authority's property portfolio, however this sometimes included economic activity. Most of the portfolio was held for conservation objectives, however when economic opportunities did present themselves, the Authority did seek to capitalise upon them. Unfortunately there was insufficient time to ask questions of Mr Meopham, and he was asked to return at the end of the day (Minute 5e refers).

Ms Dunne gave a presentation which focused on Development Management and the Local Development Plan and how planning applications impact on economic development within the National Park.

Points raised in the session with Ms Dunne were as follows:

- Valuing Wales' National Parks (September 2013) stated that there were 1,390 business units in the Pembrokeshire Coast National Park employing 7,000 people, and that the National Park's environment supported 3,532 of these jobs directly and a further 529 indirectly.
- On average businesses in Wales' National Parks employed 15.06 people, which was lower than the Wales average of 26.92
- The level of employment in National Parks was similar to that in the rest of Wales
- The average Gross Value Added (GVA)/population for the Welsh National Parks was c£7,000, which was lower than the rest of Wales where there were more advanced employment opportunities.
- It was suggested that the reasons for these figures was likely to be that National Parks contained diverse rural businesses in sectors linked to tourism. Many of the businesses were smaller and there was a lack of manufacturing, but lots of self-employment and lifestyle businesses.
- Pembrokeshire County Council had commissioned a business survey of a sample of businesses in 2012 which had highlighted that business confidence was relatively high going forward but barriers to growth included apathy within the economy, high business rates, competition from larger businesses and seasonality
- The majority of responses to a question regarding the availability of business support stated that there was no support, which officers found quite worrying, and possibly due to self-employed business people who were not aware of the advice network that was available.
- 7% of business replied that they needed larger premises, however there was no location specific advice as the survey covered Pembrokeshire businesses in general.
- The Wales Spatial Plan was the guide in writing the LDP. There were three strategic hubs in which future investment in the area would be concentrated – at the Haven/Haverfordwest, Fishguard and Carmarthen. Also rural centres with the National Park at Newport, St Davids, Tenby and Saundersfoot. Strategic employment sites needed

to be focused in larger centres and renewable energy in the Haven waterway area. Also tourism/leisure – need to lengthen the season and improve the quality of provision.

- Key Diagram from PCC's LDP which showed how the Spatial Plan translated to the policies of the LDP. This diagram showed centres within both PCC and the National Park. Employment was now acceptable within or adjacent to settlement boundaries and there would be no specific allocations.
- Planning applications - perception that the Authority refused everything. In fact in 2012/13 overall 84% of commercial or business applications were approved. Update on stats for 2013/14 – 92% approved. Fewer turbines being approved, however this was not surprising as there were fewer opportunities for turbines to fit within the landscape, especially when the cumulative effect was considered.
- Reasons for refusal usually due to detail: Location, scale, design, detailed requirements, amenity of neighbouring uses.
- Current work to update the employment background papers as part of the LDP review (handout tabled at meeting)
- Awaiting final guidance from Welsh Government on Employment Land Reviews. The Authority was working with PCC to prepare a local survey element as a precursor to the Review.
- Updated Planning Policy Wales adds a consideration for adjacent to a settlement, rather than just within. This would be a material consideration in any planning application. Such sites could be sizeable – up to 2ha – have to consider impacts on landscape.
- Other issues to be considered as part of the LDP review were on shore connections (including capacity of grid) for off shore developments; Super dairies (the accommodation of large buildings within the landscape)/ Slurry lagoons; and Sites allocated not coming forward. (handout showed current position on LDP allocations)
- The Spatial Plan still set the strategic context for the Authority's Plan through legislation, despite talk of Enterprise Zones and City Regions from politicians
- Ms Dunne considered that the Authority's policies contained sufficient flexibility to cope with new Welsh Government guidance or initiatives, however there was always a time lag in the production of such guidance.
- The Authority did not currently have the expertise or resources to provide advice on economic development other than through the role of planning. However there was currently liaison and partnership working with PCC who provided that role.
- There was no timescale for the publication of WG guidance on Employment Land Review, the Authority was working jointly with PCC using the draft methodology that WG had provided. Criteria based policies were considered to be the way forward rather than allocations as there was limited funding available to deliver sites.

- The Authority's website could be revamped to promote how the Authority responded to employment opportunities and links could be provided to PCC business support officers.
- Account was taken of rural poverty, as one of many issues, when writing policies, through the sustainability appraisal of the LDP
- Those requesting industrial units would first be directed to those already built. There was a problem with funding of allocations either in or outside of the National Park, however officers were confident that PCC would make people aware of allocations in the National Park as PCC had requested that the allocations be made.
- Caution was expressed regarding the proposed Strategic Development Management Boards as officers felt that the National Park was better able to plan for its own area.
- Officers considered that, having done both a joint Unitary Development Plan and a Local Development Plan for the National Park alone, that individual plans were more helpful. With the JUDP there was a continual need to explain to people that certain policies applied only in the National Park and others to PCC only. While it was important to collaborate and communicate with regard to the strategy, it was considered that the current LDP's allowed better engagement.
- There could be opportunities for a secondment from PCC to allow economic development officers to gain a broader perspective regarding the work of the National Park.
- Much work was done by PCC with regard to adding value in the food industry -there was a vision – many food festivals which were well attended and there was a proposal for part of the Withybush Industrial estate to become a food emporium.
- Surveys of applicants to the Development Management process had been carried out, and the results would be made available to Members; these might provide information on whether micro-businesses needed help to expand.
- If the economic duty was part of the National Park purposes it could make a fundamental difference to the Local Development Plan, depending on how such a purpose was worded.
- Members understood that there was a waiting list for industrial units in the north of the County and it was questioned why PCC were not doing more to address this; officers agreed to provide a breakdown of availability of units in the National Park by area.
- It was pointed out that not all industrial units were being used for that purpose, one in Newport, for example, was being used for storage.
- Evidence would be needed before the Authority changed its focus to actively encourage more businesses. Currently the work was largely reactive.
- The annual LDP monitoring report looked at approvals contrary to officer recommendation, numbers were currently low, however it was

acknowledged that the right for such decisions to be taken was fundamental to the democratic process.

b) Kate McEvoy, The Real Seed Catalogue and David Lewis, Hean Castle Estate, Saundersfoot

Welcoming Ms McEvoy and Mr Lewis, the Committee first introduced themselves.

Ms McEvoy explained that she was a founder and Director of the Real Seed Catalogue which grew and supplied vegetable seeds to home gardeners. The company had started in 1998 and had been based in Pembrokeshire since 2004; it was growing steadily and had a turnover in 2013/14 of £366,000. The company employed six people in fieldwork, office work and seed packing. It operated from an office in Newport and owned 6 acres of land outside the town. The company, which was small scale and organic, was considered a key stakeholder by Welsh Government as one of only four companies producing seed designed for growing in a Welsh climate. The company tried to be environmentally minded and now sold exclusively through its online catalogue, although a number of old catalogues were circulated to the Committee for their information.

Turning to the questions asked in the letter of invitation, Ms McEvoy provided the following answers:

- There were no obvious advantages to operating a business in the National Park, and in fact from a business point of view it was not helpful – she would advise others to locate outside. It was easy to recruit and retain staff as the company offered good wages and there was much unemployment
- The main problem was a suspicious and obstructive approach with regard to planning. She believed that her application for a small, traditional barn and polytunnels would have been permitted development outside of the Park area. She found the planning process slow and it was impossible to get feedback, particularly through the pre-application process. As a regulated seed business they worked closely with DEFRA and felt that the relationship was much more collaborative. Where there was disagreement, the position was put in writing and a compromise was reached. There was no uncertainty.
- Also a problem to continue to have to submit variations for minor works – all takes time, and time had a cost as there was work to do. Officers didn't seem to understand that.
- Implementation and culture needed to change, rather than policies themselves. Policies did, however, focus on tourism and agriculture, with less understanding of niche businesses.
- Clear information and certainty were critical.

Mr Lewis then introduced the work of the Hean Castle Estate. This was a traditional rural estate based around the coastal village of Saundersfoot which had been in the same family ownership since 1897. In general he was in favour of the National Park and his grandfather had been a keen proponent in the creation of National Parks. The total land area was 1250 acres and encompassed a diverse range of businesses:

- Scar Farm Holiday Park – a large static holiday caravan park in an excellent sought after location on the edge of Saundersfoot village within walking distance to the beach, shops and pubs
- Forestry & biofuels - 350 acres of managed plantations and woodlands, firewood processing & retail sales and a woodchip fired district heating system serving Hean Castle, estate buildings and cottages due to be commissioned June 2015
- The 'Hean' herd of pedigree Herefords – recently established and aiming to produce premium quality beef for local outlets
- Netherwood house - A dilapidated, grade 2 listed manor house, until recently used as a private boarding school but with planning permission to convert to a 15 bedroom 'exclusive use' serviced holiday property. The project was currently 'on hold' until time and funding was available.
- An extensive portfolio of let property: 60 Cottages, 3 Farms, 5 Caravan Parks and 3 Hospitality & Catering properties
- Coppet Hall Beach Centre –this was completed May 2014 and consisted of public toilets & changing rooms, 'Coast' Restaurant, watersports hire & retail centre, Ice Cream and snacks kiosk and local history interpretative mural

He had a different view of the planning process. The estate made many applications – 25 in the last seven or eight years, three of which had been major developments and he had a good relationship with officers. He agreed that improvements could be made to the process and felt that much could be gained by increasing the understanding of business groups of the planning system, through the use of forums with officers. This would improve the perception of planning and thus the National Park.

In a joint questioning session, the following points were made by Ms McEvoy and Mr Lewis:

- Neither had significant issues with National Park policy, but more regarding its application.
- It was suggested that there could be greater education of the business community regarding planning matters.
- Quite small scale projects were considered to be major development in the National Park and this led to additional costs. As a recent example, a visible, exposed site with a lot of constraints had professional fees just

short of £100,000 to be expended (approximately 5% of the total project cost) and there was no guarantee of gaining permission at the end of this process. It was acknowledged that planning permission was an investment, however there needed to be an element of certainty before such large sums were expended.

- The planning process was considered to have a lack of trust (that applicants would use a building for the purposes applied for), certainty in the outcome and communication and was very costly. This was putting some businesses off.
- There was a focus on tourism, however year round jobs were important.
- The Authority was congratulated on the steps it had taken to review its policy on affordable housing. While it was agreed that lots of housing was not desirable, market housing was needed to pay for affordable housing – large scale developers.
- Farming and tourism were key economic drivers. Dairy farms either needed to get bigger or they would cease to operate. It was considered that there was scope for planning officers to talk to farmers to resolve issues – greater interaction was needed.
- There was a lack of understanding by officers of niche agricultural businesses – it was hard for horticulture businesses to demonstrate financial viability as there was little experience of them.
- The coast path was well managed and this was good for marketing of businesses. Also the Authority's use of social media to re-tweet' events was considered helpful. Good experiences had also been had with Rangers and regarding signage.
- As many businesses deal with PCC for other elements, it would in some ways be easier to deal with them with regard to planning, although the need for different policies for the Park was acknowledged.
- The National Park brand was considered helpful but not vital to one of the businesses, and unimportant to the other.
- The duty to seek to foster the economic and social wellbeing of communities living within the Park was considered as important as the two existing purposes if a vibrant National Park was wanted. The landscape was not wild or empty but had been shaped by people over millennia and continued to evolve – the landscape could not be kept in stasis.
- Planning staff were considered to understand mainstream businesses but only have an element of commercial awareness. Members also needed to appreciate the cost of, for example, requiring additional landscaping.
- It was considered that the pre-application service didn't deliver what it set out to do. The idea of charging for the service was felt to be interesting, but it was important that the advice did not change between pre-app and planning application. Also that advice was received in a timely manner.



- The biggest hindrance to expansion was likely to be planning, however the point was made that not all businesses wanted to expand, due to other considerations.
- The Minister's suggestion that Planning Boards consisting of professional officers (architects, planners, etc) as well as local representation was supported.
- For major applications it was suggested that planning officers be part of the project team, attending their monthly meetings to give a greater understanding of the process and policies to all sides. Also that such applications be allowed 30 minutes to give a presentation to the Committee before any decision was taken and a right to reply to correct factual information.

c) Mr Huw Pendleton, British Holiday & Home Parks Association and Mr Chris Osborne, Wales Tourism Alliance

In introducing himself to the Committee, Mr Osborne stated that he wore a number of hats in that he ran the Fourcroft Hotel in Tenby, was President of Tenby Chamber of Trade, one of the founder members of Pembrokeshire Tourism and President of the Wales Tourism Alliance (which represented circa 8,000 tourism businesses). He added that he had influence with Welsh Government and Visit Wales and was an active influencer in government legislation and policy when it was allowed.

Mr Pendleton stated that he was Vice President and West Wales Director of the British Holiday and Home Parks Association, a Director of the Wales Tourism Alliance and Chair of the Caravan and Camping Forum for Wales. He owned three caravan parks in Pembrokeshire, which had a turnover of £3.5million.

The British Holiday and Home Parks Association had 877 members, with 385,000 pitches across the United Kingdom (54,000 in Wales). There were 250 Parks in Wales with 71,000 bed spaces. The economic impact to Wales was in the region of £317 million per annum. The Association provided the Park industry with a voice to ensure that full account of its input to the tourist industry was taken when changes to residential legislation was being considered. The Association also provided guidance and advice throughout the industry.

In a joint questioning session, Mr Osborne and Mr Pendleton raised the following issues:

- From an industry point of view, the beauty and infrastructure of the National Park had to be preserved, but the needs of the industry to compete with abroad also had to be taken into consideration.
- There was no need for a rash of new planning legislation; the holiday aspect should be retained, not all-year residency of holiday parks.

- There was a need for diversity of accommodation be it caravan parks, hotels, bed and breakfast establishments, self-catering accommodation, yurts, etc. Tourism needed to work together.
- Customers' expectations were continuously changing and there was a need to exceed these. National Parks played a valid role in protecting the environment and continuing the "heritage story", but not if it constrained tourism. A balance needed to be found.
- The purposes of the National Park Authority should include the sustainable financial environment as well. The socio-economic duty was not as forceful as it could be; it should include economic sustainability and carry equal weight with the two purposes.
- The National Park needed to be a living, working environment. As beautiful as the natural landscape was, more attractions/contributions to employment were needed also. Farming played a massive part in the Pembrokeshire economy, and if a large farm were to fail it would have a big impact on the community. Tourism was the same and the Authority shouldn't restrict tourism growth.
- Without caravan parks, there wouldn't be so many attractions, which were a valuable contribution to the area both in terms of employment and bringing money in to the area. Allowing people to buy caravans also helped the economy and did not take housing stock out of the local equation.
- Mr Osborne was a great believer in supply and demand and considered that planning should neither instigate, nor create a total block to, development in its own right. Planning was part of, but not the whole story. He used self-catering accommodation as an example, where it was getting in the way of a community's sustainability. Areas had been allowed to become desert towns out of season. Meanwhile, the people needed to work in the tourism business couldn't afford to live in the areas where they were needed.
- The current LDP's Supplementary Planning Guidance on the loss of hotels was an important tool. There was a need to be able to provide a diverse range of accommodation to cover all expectations and budgets, and the guidance tried to prevent the loss of hotel accommodation without first providing evidence that the business was no longer viable.
- There was a need to be innovative, different and vibrant to cater for customers' expectations, but such development had to be in the right place and sensitively done.
- The National Park Authority's retro posters campaign was really strong, but it needed to be supported with road signs stating that people were entering/driving through the National Park. It was a trick missed; businesses should be proud to state that they were located in the National Park and should shout about it.
- The National Park brand should be better marketed, although it was conceded that Wales as a whole wasn't marketed well either.

- Mr Osborne stated that his hotel had two unique selling points – the people who worked in it and the view from it. He added that he wouldn't be there if it wasn't for the National Park and the Authority's careful controls on development. Regular customer surveys also showed that 92% of his customers adored the pedestrian scheme between the town walls, and thanked the Authority for its vision in implementing the scheme.
  - Affordable housing had an important part to play, particularly in a business sense. If people couldn't afford to live in the National Park, they couldn't work in it either. Both businessmen were also seeing a return of skills shortages in the area, and higher instances of people from other countries working in the tourism industry.
  - Business vitality was absolutely critical; there were three strands to sustainability – environment, social and business/economy.
  - There were signs that recovery was quietly making an appearance in Pembrokeshire.
- d) Ms B Prickett and Ms A Grimes, Solva Business Forum, and Mr T Baron and Mr N Blockley, Federation of Small Businesses

Ms Prickett stated that she owned a business in lower Solva, Window on Wales, which employed fifteen staff all year round. She was also Chair of the Solva Business Forum, which had fifty members associated with sixty-two businesses in the area. The Forum was aware of how important tourism was as it had a knock-on effect for the whole village. She added that the Forum was in constant contact with the St Davids Peninsula Group.

Ms Grimes introduced herself as the Secretary to the Solva Business Forum. She also owned Solva Woollen Mill, which was the oldest in Pembrokeshire and had worked continuously throughout. The Mill was open throughout the year and employed seven full/part-time employees. 17,000 people had visited her business. She was a member of the campaign for wool and had been chosen as one of fifty participants in an event in Suffolk Cathedral the previous year.

Mr Blockley stated that the Federation of Small Businesses (FSB) was made up of thirty-three regions and 188 branches, looking after some 200,000 members across the UK. There were 7,500 members across the South Wales region, for which he was responsible, with 630 members in the Pembrokeshire branch, of which Mr Baron was Chair. Most of the members were involved in the tourism industry.

Mr Baron went on to say that the FSB had a strong network across Wales. FSB Wales was not a region of the UK, but a devolved area. It had its own policy unit and lobbied Welsh Government in Cardiff. The reason for this was due to the fact that the environment in Wales was

different to the rest of the UK. Employment in small to medium sized enterprises was higher in Wales (62% compared to less than 59% in England).

He added that the FSB took a very strong interest in all things that affected the growth of SMEs, the reason being that most SMEs in Wales outsourced business to others. By way of example, he stated that he owned a caravan site where the local builder spent a third of his time carrying out maintenance work. An environment that encouraged small growth was more sustainable than an oil refinery which, although employing hundreds of people, lost those jobs if it went under.

Mr Blockley stated that the FSB was a member-led organisation. Usually, common themes/issues were raised by members, which the FSB then lobbied for on their behalf. He went on to say that he had consulted with his counterpart in north Wales in order to provide the Committee with the views from both areas involved in the review process. He also referred the Committee to a recently published document *FSB Wales: Planning in National Parks* which he considered would be of interest to the Committee.

In a joint questioning session, the following points were raised:

- The Authority's emphasis was more on conservation than economic development.
- FSB Wales' policy unit had held meetings with Welsh Ministers and put forward a recommendation that planning powers be removed from National Park Authorities and given to the constituent local authorities. If that were to be the case, however, there would have to be close association between the National Park Authorities and the local authorities, with the former becoming a statutory consultee on planning applications.
- National Park Authorities and Areas of Outstanding Natural Beauty should work more closely with local authorities to promote economic development.
- Solva Business Forum queried whether it was their job to come to the Authority. The Forum was of the opinion that the local Rangers could visit local businesses occasionally in order to build up a working relationship.
- The Authority's Members were "faceless people", with mostly negative interaction between them and businesses. The Rangers were the face of the National Park to most people.
- The National Park was a huge tourist attraction, but it was also a living, working Park.

- If the National Park Authorities were more proactive, they wouldn't need to approach businesses in this way to ask what they thought. There should be regular consultation.
- What the National Park represented was generally good, and its aims were good but people had to live and work in it. There was a general feeling that the National Park Authority would rather have nobody living in it.
- The Scottish National Park Authorities had economy as a purpose, with equal weight, which was considered an advantage. If there was no thriving economy, where would tourists eat, sleep, etc?
- The National Park was needed by most people, but there needed to be interaction between its communities and the National Park Authority.
- There was a distinct advantage to the National Park brand, and a direct benefit from the presence of the Coast Path.
- Communities had to develop and not be frozen in aspic, but there had to be an understanding on the planning side that things did not have to remain the same. It was conceded that development should be in harmony with the National Park Authority's purposes.
- There was indifference to having a Member representative for certain areas within the National Park as there were already Rangers "on the ground"; it was more about developing trust and a relationship between businesses and the National Park Authority. Starting a dialogue would be a help.
- It was accepted that the road at Newgale was not in the remit of the National Park Authority, but it was pointed out that tourism in the north of the National Park wouldn't survive if the road was shut.
- Anything that could be done to extend the tourist season would be good. The winter months were very quiet and businesses had to rely on the summer season. More should be made of the fact that Pembrokeshire was open all year round. The National Park Authority's website and *Coast to Coast* magazine was a big advantage in that respect.
- There was a need to look at the infrastructure, particularly broadband.

e) Gary Meopham, Estates Officer, Pembrokeshire Coast National Park Authority

The Committee welcomed Mr Meopham's return to the meeting to provide evidence to Members. The following issues were raised:

- It was important to be proactive, and try to do as much as possible with and through other organisations, e.g. undergrounding of electricity lines at Strumble Head and other areas in the National Park.
- Sometimes there was an unreasonable expectation of what the Authority could do.
- There were times when things couldn't be done as it could set a precedent or would not be in keeping with National Park purposes.

- There were no areas of land in the ownership of the Pembrokeshire Coast National Park Authority that could be developed were another organisation interested in taking them forward.
- Risk-taking organisations drove the economy; they were bold and had money. The Authority could work with other organisations in this respect, but any decisions would have to take the National Park purposes into consideration.
- There was a need for a more robust approach from Members to the property portfolio.

Everyone who gave evidence at the meeting were thanked for their contributions and informed that a report on the entire scrutiny process would be published in due course. Any recommendations contained therein would be presented to the respective National Park Authorities for consideration.

## APPENDIX D5

### SNOWDONIA NATIONAL PARK SCRUTINY 25 March 2015

Present:

**Snowdonia National Park Authority representatives:**

**Members:** Dr. Iolo ap Gwynn (Chair)  
Councillor Alwyn Gruffydd  
Councillor Sion W. Jones

**Officers:** Mr. G. Iwan Jones, Director of Corporate Services  
Mr. Jonathan Cawley, Director of Planning and Cultural Heritage  
Mrs. Anwen Gaffey, Member Services Officer

**Apologies:** Councillor E. Caerwyn Roberts, Councillor John MacLennan,  
Councillor Elizabeth Roberts.

#### 1. Questioning Arrangements

The Chairman advised that a suggested list of questions had been circulated to Members and also to those who had been invited to give evidence to assist them in their preparation. Members discussed who would ask each question and the order in which they would be asked.

#### 2. Presentations and Evidence

##### a) Land Use Sector

Dafydd Tomos, George & Tomos, Architects  
Gwynedd Watkin, O.G. Thomas and Elwyn Roberts, Farmers Union of Wales  
Rhys Evans, The National Trust

The Chairman welcomed the participants from the Land Use Sector to the meeting and asked each representative to introduce themselves to the group.

- i) Dafydd Tomos, George & Tomos Architects, advised that as a practicing architect he has worked on a variety of projects in the National Park for over 10 years.
- ii) Gwynedd Watkin, County Executive Officer, Farmers Union of Wales, Arfon Area reported that he has always had a good working relationship with officers from the Snowdonia National Park Authority which has been beneficial to the farming community in the form of 5b Programmes, Rhaglen Tir Eryri, CAE etc.

- iii) O.G. Thomas, Chairman of Meirionnydd County Farmers Union of Wales and Elwyn Roberts, who farms in Llanfrothen, were Members of the Farmers Union of Wales and feel some negativity towards the National Park.
- iv) Rhys Evans, Eryri Manager for the National Trust would answer questions as they arose, as he had stepped in at the last minute to replace Mr. Richard John, the Architectural Consultant who was unable to attend.

The Chairman advised that the Committee, in the light of the current Welsh Government review of Designated Landscapes in Wales, was seeking to establish the effectiveness of National Park policies in supporting businesses and job creation in small and medium sized enterprises within the Park. Any suggestions for improvement and comments on fundamental advantages and/or problems as a result of operating within a National Park would be welcomed.

Points raised in the session were as follows:

- OGT felt that the National Park did nothing to help local people stay in their communities with more people from outside the area moving to the countryside. This change was unacceptable as local people have protected the language and the landscape over the years. He felt that the Welsh language will be lost, and there was no work for our young people which results in their moving out of their communities as they see no future for themselves. An example of this was the loss of employment opportunities as a result of the delays in the National Park planning process for the Llanbedr Airfield project. The quarries have also closed and the deterioration in employment opportunities in the area was very serious.  
Arising thereon, Officers felt the criticism was unjustified as the National Park had initially approved the certificate prior to approving the planning application. The Authority's Members had supported the proposal and officers had done everything to assist the developers with their planning application at Llanbedr.
- RE considered that if the National Park Authority answers the requirements of the two statutory purposes this was acceptable, if not, there was possibly a need to amend the purposes.
- GW would like to see "the duty to seek to foster the economic and social wellbeing of communities living within the Park" being upgraded to a third statutory purpose.
- GW noted that pockets of some areas were not Welsh speaking, but overall this was very small and the use of the language in many areas was very positive.
- GW stated that to include AONB's as part of the National Park's remit should be dependent on whether the budget was increased for this



purpose. If there was no additional funding for the National Parks, then it would not be acceptable to take on the role.

- RE felt it made sense not to duplicate the work of National Parks and AONB's.
- OGT stated that whilst some jobs were created directly by the National Park and new skills were being developed to manage rhododendron etc, overall this type of work was not very well paid. To attain a mortgage these jobs need to be permanent and in general the feeling towards the Park was negative after their failure to attract the developers to Llanbedr. He welcomed the statement which made clear and promoted the fact that "The National Park was open for Business".
- DT's experience of the National Park's planning officers had been very helpful and positive. Planning Legislation in England was now very different following the relaxation of the rules to allow agricultural buildings to be re-used without the need for planning permission.
- GW felt that it was much easier to contact officers from the Snowdonia National Park Authority to discuss planning issues compared to contacting officers from Gwynedd Council, which at times can be very difficult.
- GW saw great value in the Snowdonia National Park "brand". The Snowdonia National Park Authority should remain as it is in order to protect this area of land and sea and the AONB's should only be included if additional funding is provided.
- OGT raised concerns that the areas within the National Park border should be more beautiful and well maintained. This was not the case with many footpaths closed due to poor upkeep. A Member suggested that this may be something the Community Councils could undertake in their own areas, working with the National Parks.
- Officers advised that the Snowdonia Society was a lobby group and was a separate body from the Authority.
- RE felt the Authority should communicate better and perhaps lead a business forum to promote opportunities available for businesses in the National Park. Examples of successful businesses were Tree Tops, Antur Stiniog, Zip Wire, Yr Urdd.
- DT stated that as there were no opportunities to establish new caravan parks in the National Park, there should be some flexibility for existing businesses to grow and noted the difference between static and touring caravan sites.
- the Director of Planning and Cultural Heritage agreed that it was difficult to form policies which protect and were also more flexible. He advised that the Development Plan review this year would allow further consideration of existing policies and if they need changing this will be considered during the course of the review. Monitoring Reports have identified an increase in the number of applications for more specialised non serviced accommodation such as yurts and pods on new fairly small scale sites. Some larger scale proposals in woodland locations to

take advantage of nearby cycle tracks have also been discussed and highlight the need to amend the policy or introduce a new policy to deal with alternative accommodation types which are not caravans.

- RE agreed that it was difficult to get the balance right.
- OGT felt that in the past caravan sites were granted planning permission for shops and services on their sites and now visitors to the area rarely visit nearby towns and villages and provide no wealth for the local economy.
- RE noted that the infrastructure in Meirionnydd was poor as was the availability of Broadband. This was outside the National Park's remit but stands in the way of developers moving in to invest in new businesses.
- GW suggested that the National Park should consider allowing business opportunities for farmers in the form of small scale car parking for 5 to 20 vehicles. These could be landscaped and would provide opportunities for farmers to earn additional income.
- GW recommended that the Authority should seek other income sources, such as the new RDP fund. GW felt that businesses were not aware of the available schemes and officers from the Authority could offer this as a service to secure small grants and take advantage of opportunities like the Leader programme.
- The Director of Planning and Cultural Heritage advised that he sits on the RDP Groups with Conwy County Borough Council and Gwynedd Council.
- GW noted his disappointment that the FUW had expressed such negative views on the National Parks, which did not reflect in any way his experience of the Snowdonia National Park and its officers. DT also agreed that dealing with the Authority's officers was always a positive experience.
- RE asked that the National Park should use its status to influence Manweb, which in his opinion, exploits the farmers and landowners when services are sold. Their fees are extortionate and the National Park may be able to help with this problem.
- The Director of Planning and Cultural heritage confirmed that he has quarterly meetings with the energy providers and the very high charges make any future benefits unaffordable.
- GW would also like to see a "one stop shop" between the National Parks, Natural Resources Wales and other statutory bodies to make communication easier.

The Chairman thanked the representatives from the Land Use Sector for their input and for their willingness to be contacted again to assist the Authority from time to time.

b) **Outdoor Recreation Sector**

Martin Doyle, Chief Executive, Plas y Brenin Mountain Sports Centre  
Huw Antur Edwards, Yr Urdd, Glan-Llyn  
Tracey Evans, Chief Executive, The Outdoor Partnership

The Chairman welcomed the participants from the Outdoor Recreation Sector to provide evidence to the Scrutiny Committee. He advised that the Committee, in the light of the current Welsh Government review of Designated Landscapes in Wales, was seeking to establish the effectiveness of National Park policies in supporting businesses and job creation in small and medium sized enterprises within the Park.

Each representative introduced themselves to the group and the participants gave a brief presentation of their role with suggestions for improvement and comments on fundamental advantages and/or problems as a result of operating within a National Park.

- i) Martin Doyle, Chief Executive of Plas y Brenin, provided details of his background and interests. He advised that he had been a mountain guide since 1988 and involved in education in the mountains since the mid 1980's. Mr. Doyle moved to Snowdonia in 1992, was part of the Senior Management team for Plas y Brenin since 1994, and has been the Chief Executive for the last 10 years. Since moving to Snowdonia, Mr. Doyle has witnessed many changes in outdoor recreation, not least in the variety of activities now available. Outdoor recreation should be recognised as an important driver in the economy.

Plas y Brenin is a training centre for mountain sports, mainly for adults, but does work with children and young adults. It provides residential courses and is a large organisation with 90 employees. Plas y Brenin has 80 beds in the building, twin occupancy rooms, all en suite and 36 beds in 2 bunkhouses. Plas y Brenin provides 35,000 instructed days a year for both locals and visitors for disciplines such as climbing, mountaineering, kayaking, road cycling etc. Plas y Brenin teaches the people who teach novices and provides best practice for coaches, leaders and instructors. They work closely with the British Mountaineering Council, British Cycling, British Canoeing, British Orienteering and their Welsh equivalents. Plas y Brenin operates in North West Wales and relies on co-operation with landowners / managers. Plas y Brenin also helps to support local communities and supports the Outdoor Partnership as well as working with the YHA. The Centre's aim is to help people to develop self sufficiency in quiet recreation and provide training in these skills for them to carry on activities themselves.

The National Park has played a positive role with regard to access to open countryside which is a prime interest for this sector. National Park Officers, the Access Forums and the Warden Service provide good support. Although enshrined in law, access to the countryside still has to be delivered and the summit building on Snowdon and the visitor centre in Cwm Idwal shows how the National Park has transformed iconic spots. Mr. Doyle would welcome improvements at Pen y Pass, which lacks capacity to meet the demand. A significant improvement in car parking provision was needed, possibly creating smaller car parks nearby without disrupting the area. He had no problems with charges being raised and was of the opinion that the work undertaken at Pen y Gwryd had resulted in lost capacity.

The National Park had worked hard to resolve issues such as canoeing in upper Conwy and Ysbyty Ifan. The Authority could act as an “honest broker” getting agreements in place and improving relationships. There was also a need for the National Park to provide a visible presence for visitors and the recent warden volunteer programme had been very constructive.

Mr. Doyle outlined some negatives, such as access to water, which needs the recognition to match access to the land, although it was noted that the CROW Act helped in this. The National Parks should play a lead role in this area and, as there has been a great increase in mountain biking currently taking place in forest areas, the National Parks could assist in opening old tracks which would make wonderful routes. There needs to be a commitment to extend and improve biking access as is permitted on trails in Scotland

There was a need to create small car parks at road heads, for example at Gerlan, to provide access to the Northern Carneddau which causes frustration for all. There is no resistance in paying for car parking as this is now a fact of life.

Experience of the National Park Planning Department was that good informal advice was always available from officers but the process itself was slow and difficult, which then paralyses progress for the applicant. There needs to be some scope to speed up the process. The Director of Planning and Cultural Heritage confirmed that Wales Government was currently consulting on the planning process.

- ii) Huw Antur Edwards, Director of Gwersyll Glan-Ilyn, a residential centre for Yr Urdd Gobaith Cymru. Glan-Ilyn has been an outdoor

education centre for 65 years with the focus on giving the young people of Wales the chance to take part in outdoor activities through the medium of Welsh, with the focus on the language. A high percentage of Wales' children have attended Glan-Ilyn at some time in their lives. The centre has worked with children aged from 8 years to adults in their 80's although the customer base has changed, with schools now very much the focus. There have been 13,000 residents at Glan-Ilyn over the last 12 months making a total of 28,000 nights. The courses usually last for 3 days and at certain times, such as changeover days, there can be some 400 people in the centre. There have been changes in the method of delivering outdoor education and in recent times more use has been made of facilities outside the centre, e.g. visits to Llanuwchllyn and Llangywair, doing environmental research work, taking groups up Snowdon, running water based activities on Llyn Tegid.

Glan-Ilyn has up to 60 employees over busy periods as well as 75 who work centrally and are based at Glan-Ilyn. This makes the centre one of the largest employers in the area with all the staff being Welsh speakers. Glan-Ilyn provides a trainee programme for 18 to 20 year olds who work at the centre for 12 months, and at the end of the year attain a qualification. Some of the trainees are offered employment at Glan-Ilyn and this year 6 young people are attending the trainee course. Many Welsh speaking instructors have been trained at Glan-Ilyn. The centre also employs 15 full time instructors with teams of 3 going out into the local community to deliver activities. The centre in Cardiff also has an outdoor licence and the hope for the future is to have a network of centers throughout Wales.

Glan-Ilyn has a good relationship with its neighbours and the local community and works closely with accommodation providers in the area as well as with Coleg y Bala. All the centres work together and contribute to the local economy. Glan-Ilyn has a good relationship with the National Park as lake owners, and with the Warden Service, who at times have been assisted on the lake by staff from Glan-Ilyn. The Lake Wardens also give regular presentations to students on the work of the National Park and on the wildlife and nature of the area. Glan-Ilyn has received funds from the National Park to develop a centre of excellence; also the centre was working in partnership to develop a footpath to connect Glan-Ilyn to the village.

Overall, the experience of working with the National Park has been positive although dealing with their planning department seems to

be long drawn out and could be faster. It now feels there are more partners involved than there was in the past.

- iii) Tracy Evans, Chief Executive, The Outdoor Partnership. Has worked with the Partnership over 10 years and is one of the original officers. The Partnership was established on the back of the foot and mouth disease. Research by Bangor University showed that only 4% of the full time outdoor activity providers were Welsh speaking and from the local area. This figure has now risen to 25% and The Outdoor Partnership has recently been registered as a Charity with 6 trustees, one of whom is Ifer Gwyn who works for the National Park Authority and is a benefit to the Partnership. The Partnership has worked with over 30,000 people, who include community groups and over 1,500 have attained a qualification, providing them with career options and transferable skills. 80% of outdoor activity providers now speak Welsh which shows a great shift over the last 10 years.

The Partnership Development Officers work with local schools to arrange competitions such as kayaking etc. Access to water on the Afon Dwyrdd, although a complicated process, has now been achieved. The Partnership is a small charity which depends on grant funds. Developing volunteer projects with the Warden Service, possibly through a young ranger scheme and other training schemes with the National Park would be of mutual benefit. The Gwyrfai footpath in Beddgelert is of great benefit to the Partnership as would be developing a mountain biking infrastructure. As well as the financial support from the National Park towards the Outdoor Activity Festival, joint working on apprenticeship schemes for outdoor activities and training plans would also be welcome. The Outdoor Partnership was a readymade partner for the National Park Authority.

Further points raised in the session were as follows:

- the group felt that the National Park Authority's role was clear, but access issues were a concern and the role should be strengthened with the National Park acting as a partner, encourager and helper. Promoting access was a key role which should not be diluted.
- the group felt the third purpose should include improving local skills as part of the duty. Also a stronger role to support employment etc., as an economic driver to build a better infrastructure.
- the group were critical of access to water, planning delays and not enough car parking facilities.
- HAE noted that the Development Plan review this year would allow further consideration of existing policies, in particular the policy on

camping. Glan-Ilyn had been disadvantaged by the existing policy and welcomed the opportunity to amend it.

- the group felt the Snowdonia National Park “brand” was very important to their sector.
- MD felt that the inclusion of AONB’s as part of the National Park’s remit made sense as there were obvious links. Also, the long mountain range running down the centre of Wales was an AONB and was a draw for people whilst the Cambrian Mountains were currently unclassified. As recreation becomes more popular there will be a need to spread people further and wider.
- the group agreed that the National Park Planning Officers were very helpful and positive whilst the delays in the planning process were noted.
- MD asked whether planning officers had delegated powers as the process was so drawn out. The Director of Planning and Cultural Heritage advised that only a very small number of applications are presented to the Planning and Access Committee with the majority being dealt with through the officer delegation scheme.
- TE would like to see more partnership work with the Warden Service in the form of a Young Ranger Scheme and similar projects. Officers advised that the Authority’s newly adopted Improvement Objectives would allow the Authority to contribute to and support such schemes.
- TE would like to see the 3 National Parks in Wales as partners in the Outdoor Partnership’s Outdoor Awards.
- the group were in overall agreement that developing partnership working with the National Park would be beneficial to all, especially educational courses, volunteering, the work of the Warden Service etc.

The Chairman thanked the representatives from the Outdoor Recreation Sector for their input and for their willingness to work with the Authority. An outcome report on the scrutiny findings would be published in due course and all contributors would be provided with a copy.

The meeting ended at 12.55

## APPENDIX D6

### THE NATIONAL PARKS JOINT SCRUTINY GROUP ON THE ECONOMY 17 April 2015

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward (Chair), Councillor B Kilmister and Mr AE Sangster.

Officers: Mrs Janet Evans, Administration and Democratic Services Manager.

Snowdonia National Park Authority representative:

Members: Dr I ap Gwyn and Councillor A Gruffydd.

Officers: Mr. G. I Jones, Director of Corporate Services,  
Mr. J Cawley, Director of Planning and Cultural Heritage.

(Aberystwyth Park Lodge, Aberystwyth: 10.30am – 1.00pm)

#### 1. **Apologies**

Apologies for absence were received from Councillors DGM James, SW Jones, RM Lewis, EC Roberts, J MacLennan and E Roberts, and Messrs Tegryn Jones and Emyr Williams, Chief Executives of the Pembrokeshire Coast and Snowdonia National Park Authorities respectively.

#### 2. **Disclosures of interest**

No disclosures of interest were received.

#### 3. **Minutes**

The minutes of the meetings held on the 11 March 2015 and 25 March 2015 were presented for confirmation and signature.

It was **AGREED** that the minutes of the meetings held on the 11 March 2015 and 25 March 2015 be confirmed and signed.

#### 4. **Review of the work undertaken and the Evidence received to date**

##### a) Meeting held 11 March 2015 (Pembrokeshire Coast NPA)

The opinion was expressed that Pembrokeshire Coast National Park Authority's (NPA's) Local Development Plan (LDP) was in need of review as it no longer addressed the economic needs and direction as intended



when adopted, and that this point needed to be made in the report. Officers from Snowdonia NPA noted that they were about to embark on a review of the LDP, however guidance was awaited from Welsh Government as to how this should be carried out. The officer added that Snowdonia were also carrying out a review of their National Park Management Plan, however Pembrokeshire Coast NPA's plan had recently been reviewed and a new version had now been adopted. Members of both Authorities stated that the issue of planning had been raised by all businesses interviewed and it was hoped that a simpler development plan would result from the reviews.

It had been widely agreed that the National Park Authorities' current duty to foster the economic and social well-being of communities living within it should have parity with the existing purposes. It was hoped that the scrutiny report would be available in time for Welsh Government to consider its conclusions in this respect as part of the current Review of Designated Landscapes.

It was acknowledged that the Authorities did not currently have the resources to deliver economic development, and if the duty were to become a purpose this would require either additional resources or improved partnership working so that this could be delivered. A number of those interviewed, both at a previous meeting and in face-to-face interviews, felt that the Pembrokeshire Coast NPA's planning staff currently lacked the time and expertise to address economic development issues, particularly with regard to large scale projects.

Another Member suggested that this also underlined the problem that the Authorities were reactive in this respect, rather than proactive, and this needed to be looked at. Officers responded that this was inevitable with a policy led approach and that until the Authorities had a proper economic development remit, the LDPs could only go so far – people could not be forced to submit planning applications. In the meantime there was potential to work more closely with County Councils and possibly for planning officers also to link more closely with specialist officers within the Authority in e.g. tourism or agriculture.

It was noted that one of the conclusions of the exercise was likely to be that more statistical evidence of the economic activity in National Parks was needed.

The conflicting experiences of the Hean Castle Estate and Real Seed Catalogue had suggested to the Committee that those businesses that were more familiar with the planning system or who had access to professional advice seemed to have a better experience. Therefore it seemed that education and the provision of guidance for

microbusinesses had a role to play. Officers agreed that perhaps more training in preparing planning applications was needed as individuals or smaller architectural firms would not have the in-house support to address the complexities of the planning system that larger consultancies would have. Both NPAs had worked with Community Councils and planning agents with varying degrees of success, however there was scope for greater communication with these groups as well as the public and wider business community. However it was acknowledged that staff time to provide greater levels of advice on an individual basis was limited. It was suggested that greater information could be provided on the Authorities' websites.

#### b) Meeting held 25 March 2015 (Snowdonia NPA)

It was noted that again those individuals who had a better understanding of the work of the Authority were more supportive. Attention was drawn to the importance of the Authorities' work in providing small scale infrastructure such as rural car parks, maintenance of the paths, etc and the value of the National Park brand. It was important to promote this good work and raise awareness of what was being done to promote economic growth through environmental work. An example was the Rhododendron eradication programme in Snowdonia.

Unfortunately some of the participants at the meeting had criticised the National Park Authority for an economic decline which was being felt across the country and for things, such as the lack of jobs for young people, over which the Authority had little or no control. It was, however, felt that the participants left better informed regarding the role of the Authority.

The second session had focused on the outdoor recreation sector, and the contribution of the centres to the local economy was noted as being significant, both in terms of their direct employment and in benefits to the wider community. Pembrokeshire had fewer large scale providers and the sector consisted of many small scale operations. Their message was generally positive as the National Park brand helped them to attract visitors. The centres in Snowdonia also enhanced the language and cultural aspects of the economy.

#### c) Scrutiny Process

It was agreed that the process had taken too long, partly because of the wide scope of the exercise undertaken, and it was noted that future scrutiny exercises should be more focused. However the fact that the review was being undertaken by two Authorities had made the logistics more complicated. Members also agreed that stricter deadlines should have been adhered to. It was also suggested that more statistical

information should have been gathered at the outset in order to provide a baseline and this could have led to a more targeted subject area.

**5. Consideration of whether any further information/evidence was required**

It was agreed that the Committee had a reasonable body of evidence on which to base its recommendations and that it was important that all recommendations were evidence based. These could include recommendations that further work was necessary. However for future scrutiny studies one Member felt that there should be more independent research and that as a result care had to be taken in how the report that this Committee produced was used; this was not accepted by all Members. The point was also made that the views of politicians were being sought as they were key decision makers and their support would be needed in addressing some of the issues identified.

**6. Structure of the Final Report**

Based on the evidence received as part of this process, it was felt that the report should be positive and should underline that those who lived and worked in the National Parks generally appreciated it and felt pride in it. The collaborative nature of the project should also be underlined. It was felt that the context should stress the role of the National Park as one of the organisations within their areas which worked to sustain local communities and the importance of working in partnership with others to do this. It was hoped that there would be opportunities to nurture those partnerships.

In terms of the key points and recommendations, the importance of the current economic duty becoming a National Park purpose had been universally supported, however the proposed wording as currently drafted by the Panel involved in the Review of Designated Landscapes needed to be strengthened. The need to review the Local Development Plan in the light of any change in the Authorities' purposes was agreed. There also needed to be greater partnership working, principally with the County Councils, and also greater engagement and a closer relationship with other bodies such as Community Councils, tourism bodies and business organisations possibly through a business forum. Officers also needed to be more business aware in their day-to-day work. In addition, Members needed to undertake a greater ambassadorial role and greater training and encouragement would be needed to achieve this.

The importance of the National Parks and their surrounding areas delivering a good visitor experience was also brought out, together with the evidence that the industry could deliver a good career for young people with the right skills. Marketing of the National Park brand was felt

to be good, however improvements could be made in promoting their achievements.

Thanking everyone for their contribution, the Chairman said that she would try to assemble the information into a report and circulate this electronically for comment. It was hoped that the report would be finalised at the next meeting of the Committee which would take place by video conference on the afternoon of 6<sup>th</sup> May. Once the report had been agreed by the Authorities, it was hoped to engage with politicians to ensure progress was made.

## APPENDIX D7

### THE NATIONAL PARKS JOINT SCRUTINY GROUP ON THE ECONOMY 6 May 2015

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward (Chairman), Councillors DGM James and B Kilmister, and Mr AE Sangster.

Officers: Mr Tegryn Jones, Chief Executive and Mrs Janet Evans, Administration and Democratic Services Manager.

Snowdonia National Park Authority representative:

Members: Dr I ap Gwynn, Councillors A Gruffydd, J MacLennan, C Roberts and Mrs E Roberts.

Officers: Mr. GI Jones, Director of Corporate Services and Mr. J Cawley, Director of Planning and Cultural Heritage.

(Via video conference between Llanion Park, Pembroke Dock and Penrhyndeudraeth: 2.00p.m. – 3.00p.m.)

#### 1. **Apologies**

Apologies for absence were received from Councillors E Edwards (SNPA) and RM Lewis (PCNPA), and Mr Emyr Williams, Chief Executive of Snowdonia National Park Authority.

#### 2. **Disclosures of interest**

No disclosures of interest were received.

#### 3. **Minutes**

The minutes of the meeting held on the 17 April 2015 were presented for confirmation and signature.

It was **AGREED** that, subject to a correction to the spelling of Dr Iolo ap Gwynn's name, the minutes of the meeting held on the 17 April 2015 be confirmed and signed.

#### 4. **Draft report of findings**

The Chairman referred Members to her draft report of findings and the recommendations contained therein. She thanked Mr AE Sangster for his support and advice during the drafting period.

A lengthy debate ensued concerning general and more specific aspects of the report, including a discussion on whether the report should be published for internal use only as a baseline for commissioning further external research into the work of the National Park Authorities. Members accepted that there were changes that needed to be made to the report and that further examples/references needed to be incorporated before the report could be finalised.

It was **AGREED** that the respective Authorities provide further comment/evidence in order that a final draft report could be presented to the next meeting of the Committee for ratification.

## APPENDIX D8

### THE NATIONAL PARKS JOINT SCRUTINY GROUP ON THE ECONOMY

8 July 2015

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward (Chairman), Councillor B Kilmister and Mr AE Sangster.

Officers: Mr Tegryn Jones, Chief Executive and Mrs Janet Evans, Administration and Democratic Services Manager.

Snowdonia National Park Authority representative:

Members: Dr I ap Gwynn and Councillor Mrs E Roberts.

Officers: Mr E Williams, Chief Executive, Mr GI Jones, Director of Corporate Services and Mr J Cawley, Director of Planning and Cultural Heritage.

(Via video conference between Llanion Park, Pembroke Dock and Penrhyndeudraeth: 2.00p.m. – 3.15p.m.)

**1. Apologies**

Apologies for absence were received from Councillors DGM James and RM Lewis (PCNPA) and Councillors J MacLennan and C Roberts (SNPA).

**2. Disclosures of interest**

No disclosures of interest were received.

**3. Minutes**

The minutes of the meeting held on the 6 May 2015 were presented for confirmation and signature.

It was **AGREED** that the minutes of the meeting held on the 6 May 2015 be confirmed and signed.

**4. Draft report of findings**

The Chairman reminded Members that, at the last meeting, she had presented her draft report of findings for comment. It was considered

that further comment/evidence was needed on some points raised in the report and it had been finally agreed that the respective Authorities provide such details in order that a final report could be presented to the next meeting for ratification. The amended draft report before Members that day incorporated the comments made in the interim, but the Chairman considered that there were still some elements that needed clarification. She sought Members' comments on the points raised, but with a view to finalising the report that day.

Members debated at length the draft report before them, suggesting amendments, re-wording, etc. It was accepted that some alterations needed to be made before the final document could be published.

It was **AGREED** that the Chief Executives of both Authorities work together to incorporate the suggestions made by Members and officers at the meeting, and that the final draft report be submitted to the next respective National Park Authority meeting for discussion.



## APPENDIX E1

Discussion with Paul Davies AM and County Councillor David Howlett

Haverfordwest Monday 2<sup>nd</sup> March 2015

In the main Paul's view is that the majority of people have a fairly positive view of the National Park and the way it operates although he does have the occasional constituent raising concerns about the effect of the NPA on their employment and living in the area and also on successfully managing businesses in the Park – mainly over planning issues.

The PCNPA is generally viewed as being more stringent in its planning policies and hurdles than PCC by the public at large and as far as business is concerned PCNPA is not seen as being supportive. He provided as an example the noise that the FSB were making last year with their survey. He accepted that the survey might have been rather dodgy in the way in which it was carried out but it fed an existing perception and was not countered very well by us or the other NPAs.

He also accepts that the view of our planning policy is perhaps not always accurate but rather that there is a gap between perception and reality (for example far from being obstructive to the majority of planning applications Paul knows that over 85% are approved). He believes that PCNPA should be more proactive in tackling and dispelling these myths. We don't explain and promote what we do to support the local economy.

There is also an issue as to a variation between Tegryn and the Directors and some of the staff on the ground with the former being well able to take a wider and more pragmatic view (and Paul has a very useful and positive relationship with Tegryn) but the staff with whom most members of the public deal with being more rigid and falling back on policy and procedures rather than adopting a partnership approach to seek a mutually acceptable solution to problems when they emerge. The default should not be "NO" but rather "not that way but let's see if maybe there is another way".

He sees that business has difficulty in planning effectively for their future needs because of the difficulty of understanding what PCNPA's view of what it expects and will allow from business. Thus the need to deal with the PCNPA especially on planning matters is seen as a barrier to growth.

He is very supportive of moving the socio economic duty to a statutory purpose.

He has concerns as a result of cases he has dealt with about our affordable housing and our accessibility policies. The former is too expensive and restrictive and prevents developments taking place for and by individuals. The latter is plain daft in allowing affordable housing or tourism economy building but not for normal housing. This again militates against local people trying to stay living and working in the area.

He sees that PCNPA has a crucial role to play in supporting the vitally important tourism economy and in the main does so well. Improvements could be made

however in building on the excellent marketing already undertaken and the realignment of policies to better support development of businesses in the sector as touched on above.

## APPENDIX E2

Discussion with Simon Hart MP 10.00 am 27<sup>th</sup> February 2015

15 St John Street,  
Whitland  
Carmarthenshire

[Simon.hart.mp@parliament.uk](mailto:Simon.hart.mp@parliament.uk)  
01994 342002

- The National Park has long experience of helping to promote the area as a tourist destination
- Uncompromising in protecting landscape (rightly so)
- As result sometimes seems disconnected from economic activity and innovation
- Praise of Tegryn Jones, CEO's approach to the tension between economic activity and the Sandford Principle
- Staff should be more flexible
- Believes that there has been a change of approach recently
- Issue of Affordable homes policy and Accessibility rules problematic for developers and business generally
- Not so many complaints made to him in recent months
- Approves more sensible approach epitomised by Huff House and Hean Castle applications
- The Park needs to engage more effectively with public and explain what is possible
- Should be open and accessible, explaining policies to businesses.
- Believed the present duty on the economy should become a purpose

## APPENDIX E3

### Discussion with Stephen Crabb MP - Haverfordwest Friday 6<sup>th</sup> March 2015

Stephen started off by saying that he saw PCNPA as a powerful, very strong brand that is a distinct asset to Pembrokeshire.

However this is offset to a significant degree by the PCNPA often exhibiting a real lack of sensitivity to the people who live in the Park. He would be supportive of having some direct accountability by for example having the PCC nominated members being replaced by directly elected members as is the case he believes in Scotland.

PCNPA is good at presenting a “picture postcard” vision of the Park which he sees as both a strength and weakness.

The retro poster campaign for example was “brilliant” but is offset by the common frustrations experienced by many of petty decision making and a real lack of any demonstrable actions in supporting business and the economy in the Park. The economy changes but the Park does not change its approach to meet its new requirements.

He evidenced this with some examples where, on behalf of constituents he has been “tearing his hair out” in battles with individual officers usually in the planning department (as it is planning issues he has most complaints about, who are inflexible and singularly unsympathetic and unhelpful and completely lacking in the common sense that Stephen believes should be much more in evidence in the way that the PCNPA deals with people and businesses.

Some of the examples he gave included a fisherman wanting storage for a tractor which in Stephen’s view could have been resolved much more quickly had the officer/s not “dug their heels in”; a replacement window in Newport which was similarly opposed and delayed but where the PCNPA eventually backed down; and the planned new development of a business at St Ishmaels that “took years to resolve” etc.

Whilst he recognises that the planning department has improved over the past few years he is still of the view that more pragmatism and common sense is needed and he is also extremely supportive of the socio economic role of the Park being formally recognised as a statutory purpose.

Our affordable housing policy is a nonsense in the way in which it increases costs for individuals wanting to build houses for themselves or their family to stay living and working in the area.

His dealings with senior officers are not like those that he has complaints from constituents about in their dealings with individuals in the organisation at more junior levels.

At senior levels there is evidence of the pragmatism and common sense he sees should inculcate the whole Authority. He has had a number of dealings with Tegryn for example, who whilst he will always defend his officers he finds to be professional, polished and (that most looked for quality) pragmatic.

## APPENDIX E4

### Pembrokeshire Tourism Response.

#### “How could the National Park Authority, in terms of its policies, better support businesses in the Park to prosper and expand?”

Pembrokeshire Tourism is the leading trade association in Pembrokeshire for businesses involved in or interested in the tourism and visitor economy. Our membership is drawn from all sectors within the industry and also provides a good geographic spread through the county.

We understand that the National Park Authority does not have the delivery of economic development as a primary function, with any economic outcomes being viewed very much as a ‘by product’ of the delivery of duties in relation to conservation, access and recreation.

That said, a significant proportion of the work carried out by the National Park Authority does create an economic benefit for businesses both within and outside of the Park boundaries.

The work undertaken by the Park to deliver the primary functions of conservation and access contribute to local businesses in a number of ways. A significant number of our members are accommodation providers catering for visitors to the county, many of whom choose Pembrokeshire as their destination on the basis of it being a coastal National Park, with a strong reputation for a well maintained landscape. These businesses in many cases are building their own marketing activity on the strength of the National Park and the attraction of activities such as walking when promoting their product to potential customers.

Within the Local Development Plan there are two clearly defined goals in relation to the economy of the county:

- 1) Help to create and maintain a diverse, viable and sustainable local economy benefiting all sections of the community. (Policy 42 and Policy 43)
- 2) To attract a sustainable number of people at all times of the year to enjoy the special qualities of the National Park. (Policy 35)

To date the National Park has done well against these goals, whether through the continuing delivery of conservation and access work, consideration of planning applications or involvement in the Destination Pembrokeshire Partnership. Additionally the outstanding success of the 60<sup>th</sup> Anniversary Poster Campaign added significantly to the tourism economy in the county, and continues to do so as the images and associated photographs are widely used and recognized.

We are fortunate here at Pembrokeshire Tourism to have developed a good working relationship with the Park Authority. We are able to communicate to our members the work of the Authority and how they can maximize the opportunities this activity affords for their businesses.

Tourism is a key economic sector within Wales, and particularly so here in Pembrokeshire. The support afforded to the sector however is coming under increasing pressure against a backdrop of financial cuts within Pembrokeshire County Council and to a lesser degree the National Park Authority. Neither body currently has a statutory obligation to provide support for the tourism economy, however given the importance of the sector locally, both in terms of job creation, overall jobs supported, and the scope for growth and development, it would be sensible to consider whether there should be a greater emphasis on a strong commitment to economic development.

The work currently undertaken by the Park Authority already delivers a number of economic benefits as a 'by-product'. If the primary purposes of the Park were expanded to include a third, namely delivery of economic development, there would be considerable scope to add significantly to the local economy. For example, destination marketing activity generated specifically by the National Park would provide greater benefits to tourism businesses located within the Park boundary as they would be able to take advantage of such campaigns through their own activity and directly link to them, whereas at present it is more by the endeavours of private individuals that such marketing activity occurs.

The Pembrokeshire Coast National Park is a strong and well respected 'brand', and the identity therefore associated with it is important for future destination marketing activity. The accolade from the National Geographic in 2010 reinforces this: "magnificent protected coastline from both an ecological and geological perspective. Land-based and marine-based conservation tourism appeals to all ages. Current stewardship practices maintain quality and integrity". The future remains uncertain in light of the recommendations of the Williams Commission, and as such it is quite possible that at some stage Pembrokeshire will cease to exist as an Authority. For businesses to continue enjoying the benefits associated with marketing the destination under the Pembrokeshire brand, it will be vitally important that the National Park Authority is able to reinforce that through activity specifically supporting the local economy. Whilst the Park does not cover the entirety of the county, it is a key stakeholder in that identity and as such has the potential to make a significant contribution to economic activity, business growth and development both now and in the years to come.

## APPENDIX E5

Karen Anthony  
Director of Policy Wales, CLA  
Tŷ Cymru  
Presteigne Enterprise Park  
Presteigne  
LD8 2UF

Thank you for the opportunity to make representation to this scrutiny. I apologise for the delay which was caused by notification of the exercise being sent to our former Director.

During the short time scale that has now been afforded to us, our enquiries have been largely confined to members of our regional committees which can only be a representative sample of the membership.

Within those confines overwhelmingly the response has been one of disappointment that the scrutiny is not universal to all Welsh National Parks. As you may recall, CLA Cymru and the 3 NP's undertook some joint information seminars in early 2013. The response from each was predominantly positive and the most recent reports of engagement with both Pembrokeshire and Eryri are positive. Whilst we have the odd report of difficulties, they are predominantly resolved by early engagement and a willingness on both sides to do what is best. In the 2 parks under examination, members report that the need for understanding business needs is supported by a willingness to listen and advise. Members have always accepted that not all developments will be consented but the early engagement and understanding of the needs has been appreciated in most parts. Sadly membership experience does not support the same level of collaboration with the BBNP authority.

I have become aware of one issue which surrounds the attitude to enforcement, but I will take that up under separate cover confident that it will be resolved amicably.

If necessary I would be happy to provide verbal feedback to your review but feel that at this point the relationship with these two parks are such that as a representative body we can approach as necessary on a case by case basis.

Kind regards  
Karen



## APPENDIX E6

### NFU Cymru response to Pembrokeshire Coast and Snowdonia National Park Authorities' Joint Scrutiny Review

NFU Cymru welcomes the opportunity to submit written evidence to the Pembrokeshire Coast and Snowdonia National Park Authorities' Joint Scrutiny Review which seeks to establish how successful National Park policies and work are in supporting business.

NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors. Our aim is to establish the background conditions in which farm businesses can be profitable and develop.

The importance of the farming industry as the backbone of rural Wales cannot be over-stated, the Welsh Government identifies that the vitality and potential of rural areas is closely linked to the presence of a competitive and dynamic farming sector which also plays an important role in generating additional economic activities.

The range of goods and services delivered by agriculture in Wales is unparalleled by any other industry. First and foremost we provide safe, high quality food and are the cornerstone of the £4bn Welsh food and drink sector; alongside this, as farmers, we have created, care for and manage our treasured Welsh landscape which not only supports a diverse range of species, habitats and ecosystems but also provides a significant backdrop for our tourism sector worth an estimated £1.6bn annually.

NFU Cymru would highlight the need to recognise the fact that the Welsh landscape both within National Parks and more widely is not 'natural'. It is the result of centuries of farming and other activities by man. It is also important to understand that agricultural land which has been created, shaped and maintained by farmers makes up by far the largest proportion of land area within the designated areas.

NFU Cymru believes that it is vitally important that National Parks are viewed as living, working environments which are constantly evolving. As such, we are keen to see National Park policies which take into account and embrace equally the economic, social, cultural and environmental strands of sustainability.

NFU Cymru has long called for an appropriate balance to be struck between the weight attached to protection of the landscape and community and business development within the National Parks. It is our view that National Parks have to some extent de-emphasized the socio-economic aspects, prioritising landscape conservation above all else with insufficient regard given to the social and economic wellbeing of those living and working within these areas.

It is our view that the most important qualities and features of designated areas are the people and communities who live and work within them, particularly, those in the land-based sectors with critical role in shaping and maintaining the landscape. It is these individuals and businesses that provide a cultural dimension to the visitor experience as well as the economic rationale underpinning landscape quality.

We, therefore, emphasise the need for an increased economic focus in decisions taken with respect to development. We would highlight that modernisation and investment in the latest technologies in farming will be essential going forward. Farms are also well placed, and should be actively encouraged and supported to harness the natural resources available to generate renewable energy.

Also, given that farmers in Wales are operating in global commodity markets and are increasingly exposed to market volatility, developments that allow them to diversify their income and increase business resilience should also be actively supported and not stifled within Park boundaries. It is our view that the National Parks need to proactively support the development of redundant farm buildings and derelict farmhouses. We would stress that whilst these buildings may have served their useful purpose in agricultural terms they can be developed and continue to deliver economic and aesthetic benefits.

We would also express concern that development within the National Park often costs more as a result of the need to change the siting of buildings, the requirement for stone cladding etc. Going forward we would stress the need for improved visitor management with some acknowledgement within policy that there is a limit to how many visitors 'honey pot' areas can accommodate. We are concerned that whilst significant effort is made to promote National Parks as visitor destinations, often this is not accompanied with appropriate visitor infrastructure with budgets for 'wardening' and footpath improvements increasingly challenged. It is our view that visitor access should emphasise quiet enjoyment on foot to CROW access areas and no more than that.

Finally, we would express some concern that the National Parks are increasingly exerting influence beyond their physical boundaries, through for example, objecting to renewable developments that can be seen from the National Park.

To conclude we would highlight that NFU Cymru supports a planning system that delivers national, local and community objectives by supporting appropriate development. Central to this vision is a planning system that demonstrates a thorough understanding and appreciation of the role of agriculture, not only from the perspective of farmers as food producers and principle land managers but also having due regard to the critical economic relationship between the appearance of the countryside and the need for profitable businesses to sustain it.

It is vital that farms and businesses within designated areas are able to react to wider Government and EU Policy objectives through, for example, investments in renewable energy projects and farmyard infrastructure for slurry and manure storage necessary to meet Water Framework Directive requirements. Farmers in these areas should incur no increased costs over and above farmers in other areas in terms of putting together a more detailed planning application, or indeed having to accept additional 'conditions' to planning permissions.

NFU Cymru welcomes the Pembrokeshire Coast and Snowdonia National Park Authorities' Joint Scrutiny Review. We would stress that designated landscapes are not 'natural' but are the result of centuries of farming and other activities by man. Without sustainable agriculture and healthy local communities to underpin them, these landscapes would not be maintained

## APPENDIX E7

Notes from meeting between Snowdonia NPA and Gwynedd Economic Development department

### **Have you formally dealt with the National Park Authority? If so, please provide a brief description of the result**

- Attitude has changed recently, less negative
- A lot more willing to discuss and develop ideas, including some challenging ones
- Authority has been helpful in developing the “Snowdonia centres of excellence” project
- No more difficult dealing with planning matters in the Park than Gwynedd’s planning department

### **How can the National Park do more to help businesses in the Park prosper and expand?**

- Infrastructure – don’t think the infrastructure is adequate in the Park – most industrial estates are on the Park boundary – obvious gaps in relation to Dolgellau and Bala
- Most small businesses in rural areas are “lifestyle” businesses – but when there’s a need to expand the business from the current property the infrastructure doesn’t allow for it
- Need to identify more land for small development sites in the Local Development Plan
- Need for the Local Development Plan to recognise and refer to the designated “Enterprise Zone” in Meirionnydd

### **In your opinion and experience, has the fact that your business is located in a National Park been of advantage to your business or not?**

- Generally, it is considered that the designation gives an advantage to businesses, particularly in the tourism sector
- There are marketing advantages to the designation for businesses

## APPENDIX E8

### NOTE OF JOINT PCNPA AND PCC MEETING ON ECONOMIC DEVELOPMENT AND SCRUTINY

Held at County Hall, Haverfordwest on the 5<sup>th</sup> December 2014

Present:

Pembrokeshire Coast National Park Authority representatives:

Members: Mrs G Hayward, Councillors DGM James, B Kilmister and RM Lewis and Mr AE Sangster

Officers: Mr T Jones, Chief Executive

Pembrokeshire County Council representatives:

Members: Councillor K Lewis, Cabinet spokesperson for communities and voluntary sector

Officers: Dr S Jones, Director of Development, Mr M White, Head of Regeneration and Ms C George, Partnership and Scrutiny Support Coordinator – Economy and Environment

#### Main points raised

1. PCC's Economy Overview and Scrutiny Committee have undertaken a lot of work on this subject. PCC decisions are based on evidence/statistics from Welsh Government and other sources, although it's not as strong an evidence-based approach as it could be (PCC doesn't have a dedicated research unit to digest all available data). "There's a lack of joined-up thinking in Wales between local authorities and research institutes, colleges, etc. which could help in this respect" (SJ).
2. The last economic profile of Pembrokeshire was undertaken in 2008; it is in the process of being reviewed. Unfortunately, no specific National Park research has been undertaken.
3. Gross Value Added (GVA) statistics show that Pembrokeshire has a low GVA (59.7) compared to Swansea (74.9) and Cardiff (100+). Average British GVA is 100.
4. There are a lot of large businesses and small/micro businesses in Pembrokeshire, but not many middle-sized businesses. There are also more part-time jobs than PCC would like to see.
5. Inward migrators tend to be cash rich, so not an economic burden. Need to find ways to encourage them to invest in businesses. Indycube(?) had recently opened in St Davids where people with ideas can share a space to develop those ideas with others. They also have links to funding streams. There are similar spaces in Narberth and Pembroke Dock.

6. The recent Welsh index on deprivation shows that Pembrokeshire is 12<sup>th</sup> highest of wards in worst deprivation out of the 22 local authorities. This is largely attributable to pockets around the Haven, but also to rural deprivation.
7. The population projection is going up, but whether in the right demographic is uncertain.
8. The lack of employment opportunities is having an effect on the Welsh language as it is driving young people out of the area to find work (KL). He asked PCNPA to take this into consideration. TJ enquired whether there are any examples where PCC has done better at enhancing economic development. KL replied that it is a big issue for PCC as well, and that the Council is having to look at ways of improving the situation.
9. “PCNPA’s sustainable transport policy does not make a level playing field for residents – the NPA is far more robust at implementing policy than PCC” (RML). “PCNPA’s LDP is outdated, and circumstances have changed since its adoption” (BK). “The ‘rigidity’ of the LDP is having a negative impact on realising the potential for economic development” (EAS). CG mentioned that the LDP is one of the barriers to the Future Generations Bill, and that it needs to keep up to meet the requirements of the Bill. “TAN 23 allows local planning authorities to give more weight to economic development” (SJ). RML agreed, stating that PCNPA’s socio-economic duty should have the same weight as its purposes.
10. TJ asked whether there is any difference between the PCNPA’s LDP and PCC’s JUDP. SJ replied that PCC prioritise planning applications that have economic development or housing implications. BK argued that PCC will favour economic development within the Council’s area first, rather than within the National Park. SJ conceded that this is probably true, although not consciously. MW added that approaches for possible development in Tenby or Newport, for example, will be referred to PCNPA; however, many are requests for larger development sites. He went on to say that PCNPA is led by a “narrow steer” – the statutory planning context is legal, but narrower – while the Strategic Improvement Plan “has a more balanced context”.
11. Tourism is important, but vacancy rates aren’t everything; there is a need for the correct retail square footage in relation to population as well. PCC has revised primary retail boundaries for the emerging LDP, so they have shrunk in places. However, the evidence base relied upon 2008/09 statistics, so circumstances have changed again since then. A more flexible planning mechanism is needed to accommodate such changes.
12. Town Teams have been established by PCC to produce action plans for their respective areas.
13. PCC would like to invest more in collaborative partnership working, but haven’t got the resources to do so. PCC is currently working with Pembrokeshire College on a STEM (science, technology, engineering and maths) project to try to improve enterprise skills and would like to see a 6<sup>th</sup> form centre for excellence with enterprise as a basis of rationale.

14. PCC has adopted a targeted approach; there is an over-reliance on some sectors and there is a need to focus more on marine and renewables. PCC has an aspiration to create a food business park in the county. The Bridge Innovation Centre is a core of diversification and is beginning to realise projects; the hope is to get fast-growing medium-sized enterprises to plug the gap. KL would like to see PCNPA more involved in this aspect.
15. SJ believes that the Destination Pembrokeshire Plan puts the county ahead of other destination management areas.
16. PCC is exploring the Business Improvement District Model, whereby businesses in a specific area contribute a small levy towards improving their trading environment and helping to meet the challenges from out-of-town shopping, the internet and other issues specific to that area. Bournemouth has introduced such a model.
17. PCC's Economy Overview and Scrutiny Committee has looked at employment sites, where the point was made that PCNPA has a role to ensure that enough sites are available to encourage/promote economic development. PCC would like to see the socio-economic duty become a third National Park purpose.
18. "It is important to create employment, particularly in terms of rural economics. PCNPA should allow/encourage small clusters (2-3 businesses) to develop in an area – this would create more impact than 2-3 separate businesses (e.g. Nine Wells, Solva or St Davids)" (KL).
19. "PCNPA's role is to encourage high-value vibrant businesses based upon good broadband connectivity" (KL).
20. "PCNPA is a huge benefit to the visitor economy" (SJ).
21. PCNPA does not have direct access to EU grant funding, but works in partnership with PCC (and other bodies) to access European monies. "There is a need to ensure that no duplication takes place; PCNPA does not want to take on an economic brief itself, but to work in partnership with others" (TJ).

### Extract from Pembrokeshire County Council, The LDP and the Pembrokeshire Economy – Page 51

December 2010

(please note paragraph numbering is not as per original.)

#### Conclusions

- 1.1 The Council has identified the need to draw together the disparate evidence used to establish whether the strategic and general policy approach to the provision of employment land through the LDP for the period from adoption to 2021 is sufficiently resilient to meet existing needs and changing economic circumstances.
- 1.2 There is considerable **uncertainty** over future direction, scope and scale of economic development resulting in a broad spectrum of scenarios for the international energy, UK, Wales economies and Pembrokeshire. The LDP must respond to this uncertainty with a resilient framework of strategic policies for economic development complemented by site allocations and strong policy criteria.
- 1.3 **Land identified for employment use will require significant investment** in infrastructure and services. There is concern that reduced public sector funding will discourage private sector investment and limit the amount of land that is effectively available for development. **Greater focus on criteria based planning policy should ensure flexibility to address employers/developers needs with due regard to environmental and other constraints.**
- 1.4 Businesses are seeking affordable premises and the need to build to BREEAM Excellent standard significantly adds to build costs. These premiums are passed on via higher rentals etc. that businesses find difficult to afford. This is especially true of engineering and similar businesses where large doors are left open for access and ventilation and some of the benefits of BREEAM excellent standards of insulation may be lost.
- 1.5 There are potential threats to the economy with global changes in the oil economy and with the two **Pembrokeshire refineries** being for sale, as major oil companies consider withdrawing from the downstream activities<sup>7</sup>.
- 1.6 There are specific opportunities for the local economy in the form of **Renewable Energy** (especially the development of Marine Energy Technologies), **Quality Tourism, Agrifood and niche manufacturing**. These activities may stimulate new investment and employment creation on sites with the necessary locational characteristics and there will be **a need for flexibility** within the planning system to consider individual cases on their merits.
- 1.7 During the period of the JUDP the availability of employment land has changed significantly due to large scale take up for major energy projects at South Hook, Waterston and the Pembroke Power Station site. This reversed the trends of the previous ten years when large brownfield sites became available. Blackbridge and Trecwn however still represent considerable “opportunity assets” for development requiring their rare locational characteristics.

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<sup>7</sup> in all 6 of the 9 major British refineries are currently for sale

- 1.8 **A combination of employment land allocations and criteria based policy is required to meet the land use requirements for dispersed rural enterprise and to ensure that appropriate employment land can be brought forward to meet location specific, diverse and unpredictable needs of rural enterprises.**
- 1.9 Detailed information on infrastructure and service constraints will be made available in supplementary planning guidance.
- 1.10 The land use implications of the Pembrokeshire economy **place a mix of requirements** for the LDP, embracing specific land use allocations, policies protecting existing employment land, minerals resources and environment and cultural heritage and criteria based policies which provide the basis for securing the right scale and type of development in the appropriate locations in accordance with the settlement hierarchy and the distinctive requirements of the economy, including, at opposite ends of the spectrum:
- for a small number of major development sites, including for energy and port related development, that may come forward over an elongated time span and which will require extensive project development and
  - for small scale development across rural Pembrokeshire.
- 1.11 Waste planning requirements for the LDP recognise the suitability of some employment land allocations for certain types of waste treatment and set out criteria for allocations for other types of
- 1.12 In relation to renewable energy the County Council has identified the need<sup>8</sup> for:
- sites for stand alone renewable energy projects,
  - requirements for renewable energy to be incorporated into major development sites and
  - co-location of waste energy uses/ renewable energy sources with energy consumers,
  - developing the potential in Pembrokeshire for servicing the renewables industry and associated Research and Development both on and off-shore.
- 1.13 **Generally there has been poor take up of JUDP allocated sites and evidence is weak that allocating a site in a rural area is effective in providing for the needs of rural enterprise. There are some significant questions about the way the rural economy functions and a criteria based economy is preferred to allocations as more responsive to the particular opportunities that arise.**
- 1.14 There is continuing squeeze on agriculture, with changing patterns of farming practice and flux between those intensifying the scale of operations, and those reducing the intensity and securing added value through quality and 'local food miles'. Increasing pressures on the Pembrokeshire housing market from tourism and those making lifestyle choices will ensure continuing employment and housing challenges for young people, with significant reverse commuting and a prevalence of low paid / part time / seasonal jobs.
- 1.15 The ageing population structure, considered alongside continuing pressures for young people to leave Pembrokeshire for education/ employment and housing is likely to continue with future growth of the rural economy predicated on tourism, personal health care and rural services. The authority recognises the importance of housing market choice and affordable housing within the Pembrokeshire economy.
- 1.16 The Pembrokeshire economy has a history of vulnerability to major plant closures brought about via external influences and decisions. Land and infrastructure requirements need to be regularly reviewed to ensure that they meet the needs of employers and investors. The WAG proposal to use the Spatial Plan process to identify infrastructure requirements will

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<sup>8</sup> Pembrokeshire County Council: LDP Background Paper on Renewable Energy 2010



help to highlight the performance of the commercial property market, it's successes and failures.

- 1.17 The authority has worked with other private and public sector organisations to ensure that the draft LDP meets the needs of businesses, investors and residents.
- 1.18 **The Authority is committed to providing resilience within the LDP in the face of these unprecedented economic uncertainties. In response to these uncertainties the LDP shall build in flexibility by identifying a range of employment sites in terms of size and location, with particular emphasis on identifying allocations to develop energy and port related economic growth around the Haven Waterway, providing opportunities for employment growth close to the main centres of population and providing for the particular needs of rural enterprise through focussed allocations supported by strong criteria based policies.**

Table 1

Type	Commentary	Centres <sup>9</sup>	Conversion	Adjacent to Centres	Countryside	Conversion
		New Build		New Build	New Build	
<b>Major Development (including Hazardous Installations, Ministry of Defence proposals, Minerals extraction)</b>  <b>National Planning Policy</b>	Major Development Test – Planning Policy Wales may permit such developments in exceptional circumstances. e.g, Combined Heat and Power Plant Milford Haven  Pantgwyn Quarry, extension to minerals extraction area.  Trefign Quarry – extraction to minerals extraction area.	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Workshops/ Industrial Units (up to 2 hectares) Policy 42</b>  <b>National Planning</b>	National Policy <b>within or adjacent</b> to  Applies to Centres identified in the National Park	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>9</sup> Tenby – Local Service & Tourism Centre,

St Davids, Newport, Saundersfoot, - Local Centre

Rural Centres: Amroth ,Angle, Bosherton, Broad Haven, Dale, Dinas Cross, Felindre Farchog, Herbrandston, Jameston, Lawrenny, Little Haven, Manorbier, Manorbier Station, Marloes Newgale, Pontfaen, Solva, St Ishmaels, Trefin, Cosherton, Hook\*, Houghton\*, Llangwm\*, Milton\*, New Hedges, Pleasant Valley\*, Roch\*, Square and Compass, Summerhill

\*Lies predominantly within the County Council's planning jurisdiction

Type	Commentary	Centres <sup>9</sup>		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
<b>Policy</b>	Example existing units at Newport, St Davids.  For business, general industrial, storage and distribution.					
<b>Local Waste Management Facilities (Policy 27)</b>	Where the proposal predominantly serves the need of the National Park community. Recycling Centres, waste transfer stations, landfill sites, composting facilities.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>Conversion of Buildings in the Countryside (Policy 7d)</b>	Accessibility criterion applies in the countryside conversions unless it is a live work unit.  Examples: Fisherman's accommodation and boat storage and maintenance – Solva – live work unit. Conversion of 2 barns to woodworking studio/workshop - Pencaer					<input checked="" type="checkbox"/>
<b>Farm Diversification (Policy 7c)</b>	The Local Development Plan relies on Planning Policy Wales for a policy context for farm diversification  Examples of permissions granted:  Bunk house accommodation  Holiday accommodation  No accessibility criterion	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Type	Commentary	Centres <sup>9</sup>		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
	No need to limit to farming related uses.  Examples – Musselwick Farm near Marloes – conversion of outbuildings to 5 holiday lets;					
<b>Borrow Pits /Local Building Stone Policy 23 &amp; 24</b>	Local construction industry benefitting from locally sourced materials.  Borrow Pits Nolton/Druidston Equine Track			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Tourist attraction or recreational facility that requires a rural location Policy 35</b>	Supplementary Planning guidance on the types of recreational uses appropriate in different parts of the National Park.			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Low Impact Development Policy 47</b>	Subsistence employment.  Supplementary Planning Guidance Low Impact Making a Positive Contribution			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>New Farm Buildings for agricultural purposes Policy 7h)</b>	Examples – Removal of 4 ad-hoc buildings and caravan to be replaced with 1 new build agricultural storage/tractor shed – Llanrhian.  Supplementary Planning Guidance Siting and Design of Farm Buildings  Supplementary Planning Guidance on slurry lagoons??			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Type	Commentary	Centres <sup>9</sup>		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
<b>Shore Based facilities &amp; Renewable Energy connections (Policy 17) and (Policy 33)</b>	<p>Aimed towards the developed coast. Technically feasible locations for onshore connections to off shore renewable energy uses may require locations on the undeveloped coast. Others include lifeboat stations, landing stages, pontoons and slipways.</p> <p>Examples St David's lifeboat station.</p> <p>Permission for grid connection to. Ramsey Sound Delta Stream unit.</p>					
<b>Porthgain, Saundersfoot, Solva and Tenby Harbour (Policy 18)</b>	<p>Supporting development that sustains harbour activity.</p> <p>Examples: Mixed use development at the Jones and Teague site at Saundersfoot – including commercial and residential uses.</p>					
<b>Renewable Energy (Policy 33)</b>	<p>Small scale wind turbines approved at Hendre Farm St Davids, Landway Farm Jameston, Shipping Hill Farm, Beavers Hill, Norchard Farm and Thornhill, Manorbier, Glasdir Farm Nevern, Rainbolts Hill Roch, Pearson Farm and Windmill Farm St Brides, Trewarren Farm St Ishmaels, Cherinlee Broad Haven.</p> <p>Solar arrays approved at the MOD Merrion Camp and Upper Porthmawr St Davids,</p>					

Type	Commentary	Centres <sup>9</sup> New Build	Conversion	Adjacent to Centres New Build	Countryside New Build	Conversion
	<p>approved on listed buildings such as St Brides Castle and incorporated into housing schemes such as Ty Solar at Glanrhyd and numerous householder and agricultural building applications where not classed as permitted development.</p> <p>Biomass approved at Hope Cove Druidstone in an adjacent barn to the dwellinghouse, householder extension to house a new boiler at Broomhill Farm Martletwy and numerous approvals for flues where not classed as permitted development.</p> <p>Hydro run-off river scheme approved at Pontfaen (100kw) generating enough electricity to power approximately 80 homes per year.</p> <p>Air source heat pumps approved at Teggars Brewery development site in Saundersfoot (for Tesco), Royal Playhouse Cinema in Tenby, numerous householder applications approved where not classed as permitted development.</p> <p>Tidal grid connections approved for the Ramsey Sound test facility at St Justinians.</p>					

Type	Commentary	Centres <sup>9</sup>		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
	Supplementary Planning Guidance on Renewable Energy Supplementary Planning Guidance on Cumulative Impacts of Turbines					
<b>Visitor Economy (Policy 38 &amp; 39, 40 &amp; 41) Camping Caravanning or chalet developments</b>	<p>No increase in number.</p> <p>Some upgrading permitted.</p> <p>Demolition of unused toilet blocks and replacement with 2 additional static caravan pitches within an existing site at Newgale. Changeover from 40 tent pitches to 20 touring caravan pitches and 20 tent pitches at Moreton, Saundersfoot</p> <p>Aim is to:</p> <ul style="list-style-type: none"> <li>- lengthen the season all year round without adverse impact on the landscape.</li> <li>- Improve quality</li> </ul> <p>Environmental improvements supported.</p>	☒	☒	☒	☒	☒
<b>Protecting against the loss of hotels (Policy 36)</b>	<p>Tests included for release to other uses in the policy</p> <p>Former Royal Gatehouse site Tenby – redevelopment continues to provide for hotel accommodation with residential and commercial development.</p>					

Type	Commentary	Centres <sup>9</sup>		Adjacent to Centres New Build	Countryside New Build	Conversion
		New Build	Conversion			
	Royal Hotel in Broad Haven – conversion to care home.					
<b>Protecting existing employment sites (Policy 43)</b>	Tests included for release to other uses in the policy					
<b>Policy 49 (Retail in the National Park)</b>	<p>Supported in a range of Centres.</p> <p>Royal Mail Depot, Tenby. Outside of Town Centre but not found to be detrimental to its vitality or vibrancy. Development will include provision of a new convenience store.</p> <p>Residential dwelling and extension to existing shop at Jameston.</p> <p>Replacement reception, office and shop at Amroth Castle.</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
<b>Policy 50 Town &amp; District Shopping Centres</b>	<p>A range of uses supported</p> <p>Royal Gatehouse Development - mixed use including new ground floor retail space of approximately 450m<sup>2</sup> and is expected to be used for comparison goods.</p> <p>Redevelopment of the Cambrian Hotel in Saundersfoot to mixed use including 6</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			



Type	Commentary	Centres <sup>9</sup>		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
	<p>additional retail units with a combined floor space of approximately 768m<sup>2</sup>. A1, A2 and A3 uses are proposed.</p> <p>The new Tesco Express Store in Saundersfoot District Centre is now complete and in use, approved under This store provides approximately 347m<sup>2</sup> of additional convenience floor space.</p> <p>Natural Healthcare Centre in Newport – policy used to protect against the loss of a retail unit within the Centre to residential use.</p>					
<b>Policy 51</b>	Supported within or adjacent to Centres	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
<b>Garden Centres</b>						
<b>Policy 55 &amp; 56</b> <b>Telecommunications</b> <b>Powerlines &amp; Pipelines</b>	<p>Criteria based policies</p> <p>Mobile Infrastructure Project has identified sites within the National Park – new masts may be required.</p> <p>Numerous prior approval applications for telecommunications development (telegraph poles, lines, broadband cabinets etc).</p>					

**Table 2 – Extracts from the Employment Background Paper – update – draft**

**PPW (7<sup>th</sup> Edition) and TAN23 requirements**

	<b>PPW Requirement</b>	<b>Initial Consideration</b>	<b>Conclusions</b>
1.	In applying location, environmental and sustainability considerations, local planning authorities should aim to steer economic development to the most appropriate locations, rather than prevent or discourage such development.	The policies of the Local Development Plan allow for the consideration of a range of uses in appropriate locations. (Policies 2 to 7; Policies 15, 17, 18, 30, 34, 35, 37, 42, 43, 49, 50 and 51) The pre-application service offered by the Authority allows for discussion with applicants, including the potential to proposals that may be refused for locational reasons to alternative sites.	No change to the Plan is needed to accommodate this national policy requirement.
2.	<p>Plans and decision should be based on up-to-date and locally-specific evidence demonstrating the suitability of the existing employment land supply. Authorities should undertake and keep under review an Employment Land Review. This should be prepared on a sub-regional basis wherever possible.</p> <p>The LDP should be underpinned by an up-to-date and appropriate evidence base to support policy choices and land allocations for economic development.</p> <p>Development plans should reflect work with neighbouring authorities and relevant stakeholders to plan strategically for employment land provision.</p> <p>The LDP should seek to provide the right amount of land and qualitative mix of sites to meet the market demand for economic development uses.</p>	<p>The strategy for the Local Development Plan is to make small-scale employment provision in the National Park. Large-scale proposals are not considered compatible with the National Park designation. Small scale employment development is seen as development involving less than 2 hectares of land for business, general industrial or storage and distribution.</p> <p>Welsh Government guidance on the methodology to undertake Employment Land Reviews is not yet published. The National Park Authority is within the south-west Wales regional planning group. As the first Authority to adopt its Local Development Plan it has reached the 1<sup>st</sup> revision in advance of the other authorities in the group. As the smallest, most rural and remote authority with National Park principles guiding all development, this Authority is not best placed to lead on an Employment Land Review for the wider group. However a review of the existing employment land and allocations within the National Park judged against the evidence of need can be undertaken. Work is commencing on a joint local review with Pembrokeshire County Council whilst awaiting the WG guidance. If this is completed in time it will be used to inform this Plan Review, else future Reviews of the Plan will be guided by the wider Regional studies.</p>	<p>Need to review all employment allocations in the Local Development Plan.</p> <p>The Authority is working with Pembrokeshire County Council to prepare a local survey element as a precursor to an employment land review. Should the review be completed within the Review of this Plan then the results can be taken into account. Else it will need to be included in the Annual Monitoring Reports of the Plan and included in a future Review of the Local Development Plan.</p>
3.	Local authorities should encourage the growth of self-employment and	The policy approach allows for proposals coming forward to be considered. (Policies 2-7, 15, 30, 42) Various allocations are for	No change to the Plan is needed to accommodate this

	<b>PPW Requirement</b>	<b>Initial Consideration</b>	<b>Conclusions</b>
	micro-businesses in rural areas by adopting a supportive and flexible approach to home working.	mixed uses, including workshops and live/work units which would support micro-businesses and home-working.	national policy requirement.
4.	The LDP should, as far as is practicable, set out an economic vision for the area, including a broad assessment of anticipated employment change by broad sector and land use.	This is set out in paras 4.179 to 4.182 of the Plan. The anticipated Employment Land Review will assist in assessing if the vision is likely to be achieved.	No change to the Plan is needed to accommodate this national policy requirement.
5.	The LDP should provide targets on land provision for employment uses (B1-B8) showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development.	Welsh Government guidance on the methodology to undertake Employment Land Reviews is not yet published. The National Park Authority is within the south-west Wales regional planning group. As the first Authority to adopt its Local Development Plan it has reached the 1 <sup>st</sup> revision in advance of the other authorities in the group. As the smallest, most rural and remote authority with National Park principles guiding all development, this Authority is not best placed to lead on an Employment Land Review for the wider group. However a review of the existing employment land and allocations within the National Park judged against the evidence of need can be undertaken. Work is commencing on a joint local review with Pembrokeshire County Council whilst awaiting the WG guidance. If this is completed in time it will be used to inform this Plan Review, else future Reviews of the Plan will be guided by the wider Regional studies.	The Authority is working with Pembrokeshire County Council to prepare a local survey element as a precursor to an employment land review. Should the review be completed within the Review of this Plan then the results can be taken into account. Else it will need to be included in the Annual Monitoring Reports of the Plan and included in a future Review of the Local Development Plan.
6.	The LDP should include policies relating to future development on existing employment sites to protect them from inappropriate development: <ul style="list-style-type: none"> <li>• encourage the regeneration and re-use of sites which are still suitable and needed for employment:</li> <li>• manage the release of unwanted employment sites to other uses.</li> </ul>	Policy 42 of the LDP protects existing employment sites for continued employment use and Policy 43 sets out the types of acceptable uses where the employment loss can be justified.	No change is needed to the LDP to accommodate this national policy requirement.
7.	The LDP should propose specific locations for those necessary industries which are detrimental to amenity and may be source of pollution.	No specific proposals have come forward requiring a land allocation of this type. Any speculative proposals coming forward will be considered against the generic policies of the Plan and its links to Planning Policy Wales.	No change to the Plan is needed to meet this national policy requirement.

	PPW Requirement	Initial Consideration	Conclusions
8.	The LDP should seek to promote and facilitate development that will deliver physical regeneration.	Several sites are allocated in the LDP on redevelopment or brownfield land. Two of the sites – The Gatehouse Site (including the Delphi Apartments) in Tenby and the Cambrian site in Saundersfoot are under construction and are delivering mixed developments including housing, affordable housing, commercial and retail space. Also allocated is Sergeant's Lane in Tenby which is a semi-derelict lane within the heart of Tenby town. Planning permission granted in June 2014 for one of the units to be redeveloped will hopefully be a catalyst for further redevelopment here. The Plan also allows for redevelopment within the harbour areas at Tenby, Saundersfoot, Solva and Porthgain.	No change is needed to the LDP to accommodate this national policy requirement.
9.	In safeguarding existing sites and providing new sites, the LDP should prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities.	The scale of opportunities for new build employment sites in the National Park is limited and generally not developed due to prohibitive infrastructure costs. This issue is best considered through a wider Employment Land Review.	The Authority is working with Pembrokeshire County Council to prepare an employment land review. Should the review be completed within the Review of this Plan then the results can be taken into account. Else it will need to be included in a future Review of the Local Development Plan.
10.	The LDP should concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres.	The largest mixed use and employment use allocations are situated in the largest settlements of the National Park – namely Tenby, Saundersfoot, Newport, St Davids and Broad Haven. Retail proposals are also directed to these Centres (policy 50)	No change to the Plan is needed to meet this national policy requirement.
11.	The LDP should include criteria-based policies to deal with development not specifically allocated in the development plan and help respond to unexpected change.	Policy 42 sets out where speculative applications for employment development may be permitted within the National Park, taking into account the scale, location and potential for combining employment uses with other uses. It also protects land for employment proposals.	No change to the Plan is needed to meet this national policy requirement.
1.	Consider and make provision for the needs of the entire economy and not just B Use Classes.	The LDP policies allow for consideration of all types of development. It also includes a number of allocations for mixed commercial, retail, community and residential use – at Tenby, Saundersfoot, Newport, St Davids and Broad Haven. At June 2014 two of the allocated sites are under construction and a third has planning permission to develop part of the site for an employment use.	Amend Policy 42, criterion b to read:  <i>Directing small-scale employment proposals to appropriate locations in or adjacent to the Local Development Plan's identified Centres or buildings</i>

	PPW Requirement	Initial Consideration	Conclusions
		<p>Whilst two of these allocations are being built, there remains sufficient scope within the remaining sites to cater for a range of uses. The policies within the LDP allow for consideration of planning applications coming forward for a range of uses. Policy 42 of the Plan will need modification in line with amendments to Planning Policy Wales (para 7.3.2) to locate employment uses within or adjacent to defined settlement boundaries.</p>	<p><i>suitable for conversion in the countryside (See policy 7d). Farm diversification can also assist. (see policy 7c).</i></p>
2.	<p>The LDP should include policies on the scope for new economic development in and adjoining rural settlements and identify suitable sites. In remote rural areas and smaller settlements a criteria-based approach should be considered.</p>	<p>Policy 42 of the Plan is a criteria-based policy which sets out how proposals for new economic development will be considered including allocation of land and directing small-scale employment proposals to appropriate locations in identified Centres or buildings suitable for conversion in the countryside. This will require amendment to reflect the change in Planning Policy Wales to allow developments 'adjacent' to Centres and to allow for a criteria-based approach for proposals in remote rural areas and smaller settlements.</p>	<p>Amend Policy 42, criterion b to read:</p> <p><i>Directing small-scale employment proposals to appropriate locations in or adjacent to the Local Development Plan's identified Centres or buildings suitable for conversion in the countryside (See policy 7d). Farm diversification can also assist. (see policy 7c).</i></p> <p><i>Criteria-based approach for smaller settlements and remote rural areas.</i></p>
3.	<p>The LDP should include policies encouraging farm diversification and new rural development opportunities.</p>	<p>The Plan policies allow for a range of rural development opportunities both through site allocations and the generic policies which allow consideration of employment enterprises within and adjacent to Centres and in the countryside through the re-use of appropriate buildings. The Plan relies on Planning Policy Wales to guide proposals on farm diversification. A footnote to</p>	<p>Cross reference to Section 7.3 of Planning Policy Wales (Edition 7) to be inserted into para 4.53 of the LDP.</p> <p>Para 4.184 of the Plan should be moved to the start of the employment</p>

	PPW Requirement	Initial Consideration	Conclusions
		Chapter 7 of Planning Policy Wales would help to clarify the policy approach.	<p>section and reworded to reflect the updated section of Planning Policy Wales, as follows:</p> <p><i>Planning Policy Wales Edition 7 sets out clear statements of national development control policy on <b>business and economic development</b> in rural areas. Please refer to Chapter 7 – <b>Economic Development.</b></i></p>
4.	The LDP should identify protection zones around establishments that hold hazardous substances and protect the ability of existing establishments to operate or expand by preventing the incremental development of vulnerable uses in the vicinity of such sites.	<p>There are a number of hazardous installation zones in or adjacent to the National Park. These are currently not shown on the Proposals Map.</p> <p>No allocations are made for hazardous substances development or potentially polluting activities in the Local Development Plan. The major development test will provide the primary policy context for the consideration of proposals for hazardous substances development.</p>	<p>Amend Proposals Map to hazardous installation zones within the National Park in accordance with the National Planning Policy requirement.</p> <p><b>NB PCC's approach was to publish a separate advisory note rather than use the LDP proposals map.</b></p>
5.	Owners of land allocated for employment use South of St Davids Assemblies do not wish to sell or release the land nor bring it forward for development themselves.	This land was allocated in the Local Development Plan in line with advice provided by Pembrokeshire County Council relating to demand in the area. Since Plan adoption there has been no interest expressed in developing the land. Whilst the need for small premises remains, the costs associated with developing greenfield sites with the necessary infrastructure is prohibitive for most small companies. There are no known proposals to privately or publicly fund such developments. In addition the landowners have recently advised that they would resist development of this land. The land is thus highly unlikely to be developed and the allocation should be	<p>Delete allocation EA748 from the Proposals Map.</p> <p>Delete allocation EA748 from the list of allocations in Table 3 of the Local Development Plan text and amend total figures accordingly.</p> <p>Amend Policy 42 of the Plan by deleting</p>

	PPW Requirement	Initial Consideration	Conclusions
		deleted from the Plan.	criterion a) and renumbering the subsequent criteria accordingly.
6.	Discussions have commenced with the landowners of Site MA776 at Broad Haven which is allocated for a mixed development of residential, workshops and community facilities. Pembrokeshire County Council has advised that the workshops are not likely to be viable.	There is a need for small premises throughout Pembrokeshire. Whilst land has been allocated for this purpose at several locations in the National Park it is acknowledged that the capital costs of providing small units is not viable. Sufficient evidence to substantiate an objection to mixed use sites such as this one at Broad Haven is not available. It is important that this does not delay sites being brought forward for development for other viable uses such as residential use. It is therefore considered appropriate to delete the requirement for the workshops at this site.	Amend site allocation MA776, North-east of Marine Road, Broad Haven to include residential and community facility uses only.  (May require further amendment to remove the community facility requirement subject to confirmation from PCC).

**Table 3 Sites Allocated for Business/Employment Use in the Local Development Plan – current issues – extract from the Employment Background Paper – draft update**

Ref	Location	Size (HA)	Brown/ Greenfield	Current position
MA706	Upper Park Road, Tenby	0.01	Brownfield	Currently being developed as part of a wider mixed commercial/residential development.
MA707	White Lion Street/ Deer Park, Tenby	0.49	Brownfield	Currently being developed as part of a wider mixed commercial/residential development.
MA232	Adj to the Business Park, Newport	0.79	Greenfield	Allocated for live/work units. Planning permission to use whole site for ice-cream factory lapsed in 2014. Landowners have no immediate plans for the site.
MA777	Rear of the Cambrian, Saundersfoot	0.30	Brownfield	Currently being developed as part of a wider mixed commercial/residential development.
EA748	South of St Davids Assemblies	0.93	Greenfield	Allocated for employment use. No interest in this site by developers. Landowners have advised they would be unwilling to release land for development.
MA746	Between Glasfryn Road and Millard Park, St Davids	0.74	Greenfield	Allocated for live/work units. No interest in this site by developers. Landowners willing to sell for development but have no plans of their own to bring site forward.
MA776	NE Marine Road, Broad Haven	2.29	Greenfield	Allocated for mixed residential/workshops/community facilities. Landowners in pre-application discussion

Ref	Location	Size (HA)	Brown/ Greenfield	Current position
				with the NPA and with PCC regarding access to the site. PCC advise that the workshops are not a viable proposition. Awaiting information from PCC on need for community facilities. Landowners keen to develop site wholly for residential use in absence of other requirements.



- PCNP Settlements
- PCNPA Mixed use Allocation
- PCNPA Employment Allocation
- PCC Settlements
- PCC Employment allocations
- PCC Strategic Employment Land
- Port and Energy Related Development
- Wales Spatial Plan Hubs

