

## REPORT OF THE HEAD OF PARK DIRECTION

---

### SUBJECT: PLANNING POLICY WALES EDITION 10 CONSULTATION

#### Purpose of the Report

1. This item asks Members to approve the attached consultation response to the above document. The response is a three Welsh National Parks' response.

#### Background

2. Planning Policy Wales is the central document which sets out National Planning Policy in Wales, on behalf of the Welsh Government.
3. The National Assembly considered the Wales Planning Act, the Well-Being of Future Generations Act and the Environment Act during a similar time period. At that time a commitment was made to review Planning Policy Wales to ensure that linkages between these Acts were addressed.
4. Planning Policy Wales has been revised in light of the 7 Well-being goals introduced by the Well Being of Future Generations Act. The intention is to show conformity with the Well Being of Future Generations Act, provide leadership in this area and change practice on the ground for Local Planning Authorities. In addition Welsh Government has taken the opportunity to update sections of Planning Policy Wales, introduce new policy and streamline the document. Because of the significant nature of the changes to the document, the Welsh Government has produced a draft for public consultation. Appendix 1 sets out a recommended 3 Welsh National Parks response.

#### Main Issues

5. The main issues arising for the 3 Welsh National Parks are:
  - The clarity of wording regarding the role of National Parks and the role of Planning Policy Wales in a National Park.
  - The ability of the user (who is primarily focusing on land use planning issues) to navigate through the document.
  - The distinction between what are land use requirements and contextual matters that a planning authority has no remit over.
  - The need for a glossary of terms, cross referencing to supporting legislation and guidance, and also the need clarification regarding what doesn't need to be repeated in Local Development Plans.
  - Issues of concern on individual policy areas:
    - population growth and housing
    - the role of Green Wedges
    - the use of Local Development Orders for self-build opportunities.

- the transport hierarchy
- the historic environment

### **Risk considerations**

6. The consultation response has sought to set out the implications of these proposals for the 3 Welsh National Parks.

### **Financial considerations**

7. The response set out has been drafted by Officers of the 3 National Park Authorities and is therefore catered for within existing resources.

### **Welsh Language considerations**

8. The publication of the draft is the responsibility of the Welsh Government. Issues arising regarding the Welsh language and land use planning are set out in the 3 Welsh Park Authorities draft response.

### **Human Rights considerations**

9. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.
10. This is a Welsh Government publication. Any issues arising for the 3 Welsh National Parks are set out in the consultation response.

### **Recommendations**

**Members are asked to approve the 3 Welsh National Park Authorities' response to the Welsh Government consultation on the draft Planning Policy Wales Edition 10.**

#### **Background documents**

[Planning Policy Wales: Edition 10 | beta.gov.wales](https://beta.gov.wales/planning-policy-wales-edition-10)  
[Welsh Government | Publication of Planning Policy Wales Edition 9, November 2016](https://www.gov.wales/publication/planning-policy-wales-edition-9)

*(For further information please contact Martina Dunne, Head of Park Direction extension 4820.)*

## CONSULTATION FORM

### Draft Planning Policy Wales: Edition 10

This consultation seeks your views on the Welsh Government's proposed revision to Planning Policy Wales in light of the Well-being of Future Generations (Wales) Act 2015.

Fundamentally, PPW has been restructured into policy themes around the well-being goals and policy updated where necessary to reflect new Welsh Government strategies and policies.

If you have any queries on this consultation, please email: [planconsultations-c@gov.wales](mailto:planconsultations-c@gov.wales) or telephone: 0300 025 5040, 0300 025 6802 or 0300 025 1128.

#### Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

#### Confidentiality

Responses to consultations may be made public on the internet or in a report.  
**If you do not want your name and address to be shown on any documents we produce please indicate here**

**If you do not want your response to be shown in any document we produce please indicate here**

## CONSULTATION FORM

Draft Planning Policy Wales: Edition 10		
Date:		
<b>Name</b>	Martina Dunne	
<b>Organisation</b>	National Parks Wales:	
<b>Address</b>	Llanion Park, Pembroke Dock Pembrokeshire SA726DY	
<b>E-mail address</b>	martinad@pembrokeshirecoast.org.uk	
<b>Telephone</b>		
<b>Type</b> <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

<b>Q1</b>	Do you agree planning policy topics be clustered around themes which show their relationships with each other and the 7 well-being goals? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	

**Further comments**

Two schools of thought emerged amongst the three Welsh Park authorities regarding the restructuring of the document one in support and one raising concerns.

In support in principle: the new integrated approach to policy development is supported. The approach taken is considered to be an innovative response to demonstrating the centrality of the planning system to delivering well-being goals. The shift away from topic based policy making will go some way to achieving culture change within the planning profession engendering a holistic outlook towards place making.

Not in support: In practical terms the re-organisation of the document, although well intentioned, has unfortunately made it difficult to navigate. The starting point for seeking a policy position on a proposal in land use planning terms will be a particular type of development – housing or employment etc. The new layout has resulted in topics being dispersed throughout the document and there is also potential for different approaches to be taken depending on which part of Planning Policy Wales is being read. The need for planning to embrace the principles of the Well-Being Act and ‘place-making’ is understood. However, the National Park Authorities’ preference would be to retain the old chapter format.

The reorganizing of the layout may also prove restrictive which wouldn't be the intention. It is the role of planning authorities to ‘make places’. The ability to achieve this varies greatly depending on scales, locations and issues to deal with. The aim should be to try and consider all four of the themes in the table below paragraph 2.17.

Paragraph 2.22 advises that the document needs to be read as a whole which is understood. The reality is however, that whilst having a general knowledge of the whole document, on a day to day basis it is used as a reference document for specific proposals. Thus the organisation of topics on a chapter by chapter basis is much more helpful. The planner's role is to pull together all the relevant strands and thereby achieve the overall place-making outcome – in a holistic way. It is the role of Welsh Government to ensure its land use planning policies are compatible with legislation. It is the role of the planning authorities to use the policies to achieve the overall outcomes.

The integration of the Well-being of Future Generations Act through the document

appears to have resulted in differing expectations from the planning authority. Terms like 'encourage' and 'promote' will not be considered to be a requirement. In certain instances the expectations are beyond the planning system.

What would be of benefit would be the application of some of the drafting disciplines needed to draft a local development plan so objectives and wider aims can be distinguished policy requirements and any supporting justification. The Well-being of Future Generations Act doesn't set out when a threshold is crossed whereby a planning authority is justified in refusing or approving planning permission. Should the Well-being of Future Generations Act and the sustainable development expectations (commencing at paragraph 2.24) not be used as an appraisal tool (set apart (different document) from the landuse policies of PPW showing how PPW has been improved upon through an explicit assessment?

Additional comments: Consider that it needs to be made clearer how land use planning contributes to 'Wales of vibrant culture and thriving Welsh Language' and 'create a million Welsh speakers by 2050'

The document interchanges (?) the term 'local planning authority' and 'local authority'. Examples of these are set out in the response.

<b>Q2</b>	Do you agree the introduction provides an adequate overview of the planning system in Wales and appropriate context? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>X</b>
<b>Further comments</b>		
1.1 to 1.41 Chapter 1 difficult to follow, containing descriptions of other documents and short statements of policy. There is a need to separate out the background evidence which could be put into an appendix or referenced at the end of the chapter as per the current Planning Policy Wales.		
1.28 to 1.32 National Development Framework, Strategic Development Plans, Local Development Plans:		
Paragraphs 1.28 to 1.32 appear to review the recent Planning Act and consequently the hierarchy of Plans and their roles. Planning Policy Wales should be a product of any review of legislation rather than the reverse? There are also several references throughout the draft that assumes Strategic Development Plans are a ubiquitous requirement.		
National Parks		

The introduction could usefully include a reference to the National Park Management Plan and its status as per the Local Development Plan Manual tests of soundness and national guidance (please see National Park Management Plans Guidance, 2007 Countryside Council for Wales & Welsh Assembly Government paragraph 4.45, page 26).

The introduction could usefully refer to the legislation applicable to National Parks – the Environment Act 1995 where there are specific requirements for National Park Authorities as planning authorities.

In addition, the National Park Authorities consider that reference should be made to the Historic Environment (Wales) Act 2016.

<b>Q3</b>	Do you agree with the Planning Principles? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>x</b>

**Further comments**

Broadly – yes. Please consider if principle 4 should be expanded to include ‘where Welsh can thrive’ to provide consistency with the WBFG Act.

However, in the implementation of these principles, the draft seems to adopt a culture of mitigating detrimental impacts rather than preventing them, which comes across as a weaker policy position when considering development proposals. It is considered that the policy statements should be strengthened and clarified in relation to development that causes unacceptable detrimental impacts that cannot be effectively mitigated. The draft has added a level of ambiguity in many policy areas in pursuit of the well-being goals, which, whilst adding an element of flexibility for policy implementation, will also lead to more uncertainty for those proposing/considering development proposals and producing/commenting on local development plans.

<b>Q4</b>	Do you agree with the definition of what is a ‘Sustainable Place’? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	

<b>Disagree</b>	<b>x</b>
<b>Further comments</b>	
<p>This could usefully be clarified as there is no specific wording that says 'here is a definition of what is a Sustainable Place'.</p> <p>There are key principles, diagrams, boxes with text in them, national outcomes, themes, along with the assessment of sustainable benefits. It is difficult to follow.</p> <p>The text encompasses everything, including matters for which planning authorities have no control. It is not clear what is meant by 'sustainable places' – does this include all of Wales or just the urban environment? Many places are already attractive and do not need to be 'created'. In equal measure the text does not include other sustainability principles such as accessibility. See also the comment regarding the rearrangement of chapters.</p>	

<b>Q5</b>	Do you agree with high-level planning outcomes highlighted by People and Places: The National Placemaking Outcomes? If not, please explain why.	<b>X</b>
<b>Agree</b>		<b>x</b>
<b>Neither Agree nor Disagree</b>		
<b>Disagree</b>		

<b>Further comments</b>	
<p>The statements are generally useful for providing a context or direction of travel but the associated diagram is queried. It is not clear why it is necessary to prescribe links in each case.</p> <p>Reference to 'how places work' and 'positive planning' assumes that a collective and participatory process will lead to a consensus of opinion to move towards more sustainable places.</p> <p>The overall approach on the Welsh language at the bottom of page 20 could usefully be clarified in relation to what is achievable in land use planning terms. The Welsh language is described as a physical entity when what it is in reality is Welsh-speaking persons or communities. Whilst there are means of protecting the interests of Welsh-speakers and effort being made to increase the number of people using the language the approach set out at the bottom of page 20 ( National Placemaking Outcomes) is difficult to reconcile with paragraph 1.8 of the Draft Planning Policy Wales which advises about not discriminating against, nor favouring any particular group or members of society. Could this be clarified?</p>	



<b>Q6</b>	Do you agree with the search sequence outlined for the formulation of development plan strategies? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>x</b>

**Further comments**

National Development Framework, Strategic Development Plans, Local Development Plans:

Paragraphs 1.28 to 1.32 appear to review the recent Planning Act and consequently the hierarchy of Plans and their roles. Planning Policy Wales should be a product of any review of legislation rather than the reverse? There are also several references throughout the draft that assumes Strategic Development Plans are a ubiquitous requirement. Are LDP 'lites' no longer proposed?

The National Park Authorities have contributed significantly in terms of comments in the preparation of the Planning Act (Wales) 2015. The Act provides for the preparation of Strategic Development Plans but not on a mandatory basis.

At this time the following factors are also influencing our view regarding any requirement to prepare a Strategic Development Plan:

- The Authorities are engaged with Welsh Government Officers on the development of the National Development Plan. It would be helpful to have sight of the first iteration of the National Development Plan to consider if at that point there is a gap that needs to be filled.
- The Authorities continue to work alongside colleagues in neighbouring Authorities when preparing their Local Development Plans including the preparation of research, joint supplementary planning guidance and joint statements of common ground.
- A final version of guidance on the preparation of Strategic Development Plans is not currently available (there have been draft informal discussion papers for inserts in the Local Development Plan Manual prepared but these haven't been progressed).

As a final thought the role of National Park Authorities under the emerging Local Government framework for Strategic Development Plans is unclear.

<b>Q7</b>	Do you agree with our revised policy approach for the promotion of new settlements and urban extensions If not,	<b>X</b>
-----------	---	----------

	please explain why.	
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
This is not a matter that is likely to be relevant for National Park Authorities to comment on.		

<b>Q8</b>	Do you agree with our revised policy approach to the preference for the re-use of previously developed land? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>x</b>
<b>Further comments</b>		
The approach could usefully be clarified to advise regarding what a planning authority can and cannot be responsible for and what it can and cannot achieve. Whilst planning officers can liaise and discuss with landowners – it is ultimately the decision of the landowner or developer when sites will be redeveloped. Risk assessment and remediation may be financed by public bodies but this will not be in the control of the planning authority. Potential for land purchase is also outside the remit of planning authorities.		

<b>Q9</b>	Do you agree with our revised policy approach for the designation of Green Belts and Green Wedges? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>X</b>
<b>Further comments</b>		
With regard to the overall difference that Green Belts are more strategic in nature and should be protected for a longer period than Green Wedges, which should be		

reviewed as part of the development plan review process, there is agreement.

However it is noted that paragraph 4.8.10 of Planning Policy Wales Edition 9 is omitted from the text, which states Green Wedges may be justified where land is required to serve the same purpose of a Green Belt. If a Green Wedge can no longer be designated for the same reasons as a Green Belt (as listed in paragraph 2.70 of the draft Planning Policy Wales), then the National Parks would not agree with this approach.

Green Wedges are considered necessary in many smaller rural villages on land which would not necessarily provide a clear distinction between the countryside and built up areas (as stated in paragraph 2.71 for Green Wedges) but would still 'protect the setting of an urban area' (as listed in paragraph 2.70 for Green Belts) and as such require additional protection from, for example, infill development.

If it is intended to differentiate between the justifications for the two designations, then a clear basis for designating Green Wedges should be provided in the draft, as it is for Green Belts.

<b>Q10</b>	Do you agree with the issues and inter-linkages highlighted in the introduction to the Active and Social Places chapter? What other issues and linkages could be identified to support this theme?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Please see earlier comments regarding the structure of the document.		

<b>Q11</b>	Do you agree that it is important for viability to be assessed at the outset of the plan preparation process and for this to be supported by an enhanced role for housing trajectories? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>x</b>
<b>Further comments</b>		

The need to assess viability is understood but it seems to have limited value in practice except when an individual proposal is put forward at a point and time and more detailed and up to date costings are available.

There are limitations to what a local planning authority can achieve in being able to identify all potential costs for the lifetime of the Plan. House prices fluctuate, Welsh Water improvements plans can change, building costs change, and expectations from national planning policy standards (introducing the potential to use life time homes for example) continue to change. The review process for a Plan is still quite lengthy and a greater degree of flexibility is needed in dealing with emerging issues. The use of buffers to safeguard against down shifts in the economy only results in policies which will not secure the true potential of a site.

The use of trajectories is dependent on the best information available but planning authorities are almost always not in control of a site's development. Paragraph 3.28 refers to the trajectory being part of the Local Development Plan when perhaps it should remain as supporting evidence.

Trajectories are based on authorities being expected to plan for growth and the figures are at best estimates.

<b>Q12</b>	Do you agree that it is important for a flexibility allowance to be included as a policy requirement in order to facilitate the delivery of planned housing requirements? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
<p>The Welsh National Park Authorities have no difficulty in aiming for the achievement of this in principle as long as it is understood that the achievement of a housing land supply along with a flexibility allowance may not be achievable in a National Park context - a 10% target is usually referred to in advice provided by the Welsh Government. The Welsh National Park Authorities also accept that they have had lower flexibility allowances agreed through Plan preparation.</p> <p>The calculation of the flexibility allowance has the same inherent difficulties as defining the main housing land supply. The requirement for Development Plans to deliver has moved the job of forward planning from a role of 'designing the best outcome' to trying to manage the will of the market. Developers will only develop when it is opportune for them to do so and whilst they may state an intention to bring a site forward for development as a means of getting land allocated, they will only do so when understandably their own business is ready to do so. Planning authorities have no control over this. Any flexibility allowance will be prone to the same</p>		

difficulties.

<b>Q13</b>	Do you agree that to deliver the new housing Wales needs it is necessary for local planning authorities to allocate a range of site sizes, including small sites, to provide opportunities for all types of house builder to contribute to the delivery of the proposed housing? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
The provision of varying sizes of sites is not necessarily possible in a National Park context and possibly in other planning authorities as well. National housing builder size sites for example may not be compatible in a National Park location. A requirement for this is likely to cause difficulties. Generally the planning authority is not in the driving seat when it comes to the submission of candidate sites. Planning authorities can seek to achieve - but can't guarantee.		

<b>Q14</b>	To ensure that small sites are allocated, should there be a requirement for a specific percentage (e.g. 20%) of sites to be small sites? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Candidate sites that are submitted are not predetermined by the planning authority to ensure there is a mix capable of providing for 20% being small sites. The choice may not be available whereby the soundness test on deliverability is met. What is meant by the term small sites? Is it to be applied across the Plan area or be required at each level in the spatial hierarchy? Furthermore, the size of sites appropriate will vary between Local Planning Authorities and therefore cannot be a one size fits all approach across the whole of Wales.		

<b>Q15</b>	Do you agree that the custom and self-build sector can play an important role in housing delivery, in particular when linked to the use of Local Development Orders and design codes? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
<p>Although in principle a good idea the practicalities of implementation need to be considered further. The expectation is that the planning authority knows the intentions of the landowner, (which may change). It may also raise expectations for self-build in a community which the planning authority can't impose on the landowner. The difficulty with this also is that it is unclear from Welsh Government's guidance on preparing LDO's how planning obligations would be considered. These types of proposals can also be confused with and seen to be 'affordable housing' provision. Clarification/further guidance is needed to manage expectations and deliver all the requirements that are expected of a 'normal' housing development.</p> <p>There are also issues relating to the need to ensure that necessary services and roadways are developed in advance of individual plots which can sometimes be difficult to control. Could more research be done into this?</p>		

<b>Q16</b>	Do you agree that negotiating on an 'open book' basis would help to improve trust between the parties and facilitate the delivery of both market and affordable housing? If not, please explain why.	<b>X</b>
	<b>Agree</b>	<b>x</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Support in principle.		

<b>Q17</b>	Do you agree with the changes to emphasise the need for the appropriate provision of community facilities when considering	<b>X</b>
------------	--	----------

	development proposal? If not, please explain why.	
	<b>Agree</b>	<b>x</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>x</b>
<b>Further comments</b>		
<p>Paragraph 3.36 seems to cover what the current standard approach is, for example, contributions to education whether in built form or financial, libraries etc. These expectations are based on the statutory provider's expert advice in terms of what the impact of the development itself will be in terms of need.</p> <p>The section on 'Community Facilities' further on refers to planning authorities developing a strategic and long-term approach to the provision of community facilities when preparing development plans. This would seem to place the expectation on planning authorities to take responsibility for the longer term plans of services such as the health service etc. Liaison is possible and undertaken but the expertise on forward provision lie with the relevant provider. Some community facilities are private such as pubs. How is 'community facilities' defined? Does this include Welsh Water programming for example?</p>		

<b>Q18</b>	Do you agree that giving greater emphasis to the transport hierarchy will improve the location and design of new development? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>x</b>
	<b>Disagree</b>	
<b>Further comments</b>		
<p>Welcome the emphasis in paragraph 3.122 but more financial support is needed from Welsh Government for rural transport in authorities to support decision making in land use planning terms.</p>		

<b>Q19</b>	Do you agree that the policy will enable the planning system to facilitate active travel and the provisions of the Active Travel (Wales) Act 2013? If not, please explain why.	<b>X</b>
	<b>Agree</b>	

<b>Neither Agree nor Disagree</b>	<b>x</b>
-----------------------------------	----------

<b>Disagree</b>	
-----------------	--

**Further comments**

New development is a miniscule part of the existing built environment and the Active Travel Act is about the way people travel generally. The vast majority of those people will be living in existing houses, working in existing businesses, shopping in existing shops etc. Wholesale redevelopment of City centres may have a greater impact, but in rural areas the effect of planning on the Act will be negligible.

<b>Q20</b>	Do you agree that the policy will enable the creation of well-designed streets? If not, please explain why.	<b>X</b>
------------	---	----------

	<b>Agree</b>	<b>X</b>
--	--------------	----------

	<b>Neither Agree nor Disagree</b>	
--	-----------------------------------	--

	<b>Disagree</b>	
--	-----------------	--

**Further comments**

Paragraph 3.128, which encourages planning authorities to challenge standardised engineering focused street design is welcomed.

<b>Q21</b>	Do you agree with the requirement for non-residential development to have a minimum of 10% of car parking spaces with ULEV charging points? If not, please explain why.	<b>X</b>
------------	---	----------

	<b>Agree</b>	
--	--------------	--

	<b>Neither Agree nor Disagree</b>	
--	-----------------------------------	--

	<b>Disagree</b>	<b>x</b>
--	-----------------	----------

**Further comments**

Planning policy has not previously required the provision of any other type of “re-fuelling” point as part of a development, it is questionable as to why this is now required and if it is relevant to planning.

- The provision of charging points for cars appears to give priority to the private car as a mode of transport. Whilst the claim of relative local reduction in pollution is understood, this proposal has the potential to encourage car use.



- Where related to industrial development, the technology for electric LGV or HGV vehicles makes their potential use at best in the medium term, as the range of the vehicles must be greatly extended before they can be viably used. This proposal perhaps suggests that a vehicle could be charged whilst off loading/loading, however the time taken to recharge a vehicle, currently around 4 hours in good conditions, would result in them being unviable for business use due to the standing time. Such vehicles will only become viable once the range allows them to be run all day for distances greater than or equal to the diesel equivalents, which would then negate the need for these charging points.
- Again, whilst the relative local reduction in pollution is understood, the power generation will still be made elsewhere creating pollution at that point. The national grid is already warning of power shortages at present, particularly since the shutdown of coal fired stations. The increased demand in charging vehicles will add to the potential of power shortages unless there is an increase in the power generated. If demand does spike due to the push to electric vehicles then the only “quick” solution would be to re-open coal fired stations, so any minimal gain from electrical vehicles would be lost.

In remoter locations a power supply to car parks is not always available.

In conclusion there does not appear to be any logic to the introduction of such a requirement, it precedes an unproven technology so may be redundant very quickly so it would appear to have no practical purpose. The provision of vehicle re-fuelling facilities has not previously been a planning consideration and does not appear relevant to planning now.

<b>Q22</b>	Do you agree with the issues and inter-linkages highlighted in the introduction to the Productive and Enterprising Places chapter? What other issues and linkages could be identified to support this theme?	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Please see comments earlier regarding the structure of the document.		

<b>Q23</b>	Do you agree with the changes to Telecommunications section	<b>X</b>
------------	---	----------

	of the draft PPW? If not, what other changes could be made to clarify the situation? If not, please explain why.	
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>x</b>
	<b>Disagree</b>	
<b>Further comments</b>		
<p>Encouraging to note the reference to disguising masts. Mast share could lead to taller masts with larger headframes to accommodate additional antennas – this may lead to a mast which was acceptable in visual and landscape terms originally to become more intrusive.</p> <p>Planning authorities do not have the remit or ability to ‘encourage mobile telecommunications’.</p> <p>The emphasis on the importance of telecommunications to the creation of sustainable communities is welcomed. Although it could be argued that as a planning authority we have little influence to encourage telecommunication development, it is important that we support the appropriate development of a fit for purpose telecommunication network.</p>		

<b>Q24</b>	Do you agree with the location of the transport infrastructure section in the Productive and Enterprising Places chapter? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
<p>Please see response earlier regarding the structure of the document.</p> <p>The significance of transport infrastructure to the development of Productive and Enterprising places is acknowledged.</p>		

<b>Q25</b>	Do you agree with the new requirements for local renewable	<b>X</b>
------------	--	----------

	energy planning as set out in the draft PPW? If not, please explain why.	
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>X</b>

#### Further comments

There is general agreement with the requirement to monitor renewable energy generation and for this to be based on targets derived from the resource potential of the local planning authority area. In their pursuit of National Park purposes, it is not considered appropriate for National Park Authorities to be required to include such targets within their Local Development Plan policies. The level of weight assigned to meeting identified renewable energy targets should not surpass or match the primary purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks and as such their inclusion could cause confusion in this regard when considering development proposals.

It is considered more appropriate for these targets to be identified in the Monitoring section of Local Development Plans with triggers to enable intervention, should the relevant policies be found to be underperforming.

The National Park Authorities disagree with the explicit requirement for planning authorities to identify spatial areas in their development plans where renewable energy developments will be permitted. Whether or not such areas should be identified should be a conclusion drawn from the Renewable Energy Assessment that accompanies a Local Development Plan.

It is concerning that no specific mention is given towards identifying ways to avoid or mitigate adverse landscape impacts in the bullets listed under paragraph 4.143. As landscape impact forms a key planning consideration for renewable energy development, it is considered that specific reference should be given here.

<b>Q26</b>	Do you agree with the use of the energy hierarchy for planning as contained in the draft PPW? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>X</b>

#### Further comments

A more detailed explanation is required for each level contained within the hierarchy and how this hierarchy should be implemented by local planning authorities and developers. This will help to embed the hierarchy within the planning process and give it a stronger weighting when considering development proposals.

Reducing demand is the most important thing to achieve before considering increasing generating capacity with all the environmental impacts associated with its deployment.

<b>Q27</b>	Do you agree with the approach taken to coal and onshore oil and gas as contained in the draft PPW? If not, please explain why. Please consider each source separately.	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Paragraph 4.163 – MTAN 2 Coal paragraph 37 confirms that Minerals Planning Authorities should exclude areas of International and National Designations of environmental and cultural importance from the Coal Resource Zones. There is therefore no requirement to safeguard coal resources within the National Parks. It is suggested that a footnote be added in this regard for clarification.		

<b>Q28</b>	Do you agree with the approach taken to promoting the circular economy and its relationship to traditional waste and minerals planning as contained in the draft PPW? If not, please explain why.	<b>X</b>
	<b>Agree</b>	<b>X</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Agree with the overall approach however the policy wording needs to be stronger to enable authorities to implement effectively. Words such as 'Preference' and 'Promote' help to outline the approach but do not set out clear requirements upon which to base planning decisions.		
Materials Balance on Site, paragraphs 4.181-183 – reference should be given towards the need to balance the benefits of minimising cut and fill and other earthworks against the overall landscape visual impact of a development proposal.		

<b>Q29</b>	Do you agree with the issues and inter-linkages highlighted in the introduction to the Distinctive and Natural Places chapter?	<b>X</b>
------------	--	----------

	What other issues and linkages could be identified to support this theme?	
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Please see earlier response regarding the structure of the document.		

<b>Q30</b>	Do you agree with the approach taken to landscape, biodiversity and green infrastructure? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	<b>x</b>

**Further comments**

National Parks: please see the attached table for comment.

Integrating Green Infrastructure and Development, paragraphs 5.68-69 – the wording could be stronger to make clear requirements from development. As drafted this will limit its weighting in considerations and make its implementation difficult for local planning authorities. A sentence could be added at the end to require development proposals to demonstrate how they have considered and responded to maximising Green Infrastructure benefits, identifying opportunities and constraints.

Paragraph 5.73-74 – it will be difficult for local planning authorities to develop effective monitoring indicators to assess Green Infrastructure, monitoring key species and habitats alone may not be effective in this regard. Should this be the responsibility of Natural Resources Wales? An approach which seeks to '*ensure that development minimises impact within areas identified as important*' rather than preventing unacceptable impacts upon them, may undermine efforts to improve Green Infrastructure elsewhere.

It is considered that the current wording surrounding National Park context and the planning system has the potential to undermine application of Section 62(2) of the Environment Act 1995.

<b>Q31</b>	Do you agree with the approach taken to distinctive coastal? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>x</b>
	<b>Disagree</b>	

**Further comments**

Welcome additional support for taking long-term views – particularly linked to flooding and climate change which are relatively infrequent but potentially singularly catastrophic events. More emphasis needs to be given to reducing risk which may take the form of small incremental change over time and which is a continual action rather than minimizing risk which can be achieved in a single event. It is considered that there should be links between onshore planning system with the Wales Marine Plan. There is also a need to identify National Seascapes where any form of offshore oil and gas and wind turbines would be inappropriate e.g. Cardigan Bay area where there is extensive intervisibility along the whole coastline.

<b>Q32</b>	Do you agree with the approach taken to air quality and soundscape? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	<b>X</b>
	<b>Disagree</b>	

**Further comments**

Paragraphs 5.130 and 5.144 – Suggest adding a requirement for mitigation measures to be measurable and therefore be capable of being monitored if required to ensure they are fit for purpose.

The three Welsh National Parks acknowledge and welcome the reference to dark skies.

<b>Q33</b>	Do you agree with the approach taken to water services as contained in the draft PPW? If not, please explain why.	<b>X</b>
	<b>Agree</b>	
	<b>Neither Agree nor Disagree</b>	

<b>Disagree</b>	<b>X</b>
<b>Further comments</b>	
<p>The approach is in general supported. The emphasis on the importance sustainable water management is welcomed. However concern is expressed over paragraph 5.162. It is not the responsibility of the planning system to undertake infrastructure planning, rather there should be a duty on the statutory undertakers to work with the Local Planning Authority to ensure that their infrastructure plans support the strategy and policy of emerging Local development Plans.</p>	

<b>Q34</b>	Do you agree with the approach taken to addressing environmental risks and a de-risking approach? If not, please explain why.	<b>X</b>
<b>Agree</b>		
<b>Neither Agree nor Disagree</b>		<b>X</b>
<b>Disagree</b>		
<b>Further comments</b>		
<p>In general the approach is supported. National Parks as special purpose Planning Authorities do not have in house expertise in relation to public safety issues such as contained within Environmental Health departments and therefore we support the statement at 5.184 which emphasises the importance in partnership working.</p>		

<b>Q35</b>	Do you agree that other than those policy statements referred to in Questions 1 to 33 above, the remainder accurately reflect the existing policy? If not, please explain why.	<b>X</b>
<b>Agree</b>		
<b>Neither Agree nor Disagree</b>		
<b>Disagree</b>		<b>x</b>
<b>Further comments</b>		
Please see attached table for further comment.		

<b>Q36</b>	Are there any existing policy statements in PPW Edition 9 which you think have not been included in the draft of PPW Edition 10 and you consider should be retained? If so, please specify.	<b>X</b>
	<b>Agree</b>	<b>x</b>
	<b>Neither Agree nor Disagree</b>	
	<b>Disagree</b>	
<b>Further comments</b>		
Please see attached table for further comment.		

### How to respond

Please submit your comments by 18 May 2018, in any of the following ways:

Email	Post
Please complete the consultation form and send it to: <a href="mailto:planconsultations-c@gov.wales">planconsultations-c@gov.wales</a> [Please include ' <b>Draft Planning Policy Wales: Edition 10</b> ' in the subject line]	Please complete the consultation form and send it to:  Planning Policy Wales Consultation Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ

Additional information
If you have any queries about this consultation, please: Email: <a href="mailto:planconsultations-c@gov.wales">planconsultations-c@gov.wales</a>  Telephone: 0300 025 5040, 0300 025 6802 or 0300 025 1128






Planning Policy Wales – 3 Welsh National Parks Consultation  
Response

✘ comments are of significant concern to the National Park Authorities


Reference	Comment
National Parks – General  ✘	<p>The 3 Welsh National Park Authorities could usefully have clarity on the role Planning Policy Wales expects of them in terms of development planning.</p> <p>The document interchanges (?) the term ‘local planning authority’ and ‘local authority’. Examples of these are set out in the response. The paragraphs on Strategic Development Plans and Local Development Plans appear to give little support to locally developed (planning authority spatial area) local development plans.</p> <p>With specific reference to NPAs - the NPAs should retain the ability to prepare Local Development Plans for their areas in line with recent reviews.</p>
Environment Act – General  ✘	<p>The draft refers to only one ‘Environment Act’ and doesn’t put a date on it. There are 2 one of which is fundamental to National Parks.</p>
National Development Management Policies – General  ✘	<p>Local ‘versus’ National Planning Matters</p> <p>The section ‘National development management policies’ at the end of each chapter was helpful. Can this be re-instated please?</p>
Local Authority Planning Authority National Park Authority – General  ✘	<p>Should these paragraphs not refer to ‘planning authority areas’ instead as National Park Authorities are planning authorities?</p> <p>2.55 The search sequence process should not be confined by <u>local authority boundaries</u> and should reflect realities like housing markets, travel to work areas and retail catchments.</p> <p>2.69 Due to their strategic nature Green Belts will have significance beyond a <u>single local authority</u> and they should only be proposed as part of either a joint LDP or an SDP.</p> <p>3.24 The latest <u>Welsh Government local authority level Household Projections for Wales</u>, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan will form part of the evidence base for the plan.</p>


Reference	Comment
	<p>4.74 Effective planning for the economy requires planning authorities to work strategically and co-operatively, through the SDP process, directing development and investment to the most efficient and most sustainable locations, regardless of which <u>local authority area</u> they are in.</p> <p>4.75 The development plan should reflect work between neighbouring authorities and other relevant stakeholders. Travel-to-work patterns do not reflect <u>local authority boundaries</u> and it is essential that planning authorities identify and make adequate provision, through the SDP, for their role in the regional and sub-regional economies of Wales.</p> <p>4.106 To assist in the achievement of these targets, local authorities must take an active, leadership approach at the local level by identifying targets for renewable energy in their development plans.</p> <p>5.62 Planning authorities should protect trees, hedgerows, groups of trees/shrubs and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function. Planning authorities should consider the importance of native woodland and valued trees, and should have regard, where appropriate, to <u>local authority</u> tree strategies or supplementary planning guidance.</p> <p>5.102 The statutory historic environment records for <u>each local authority</u> area are managed and kept up-to-date by the Welsh Archaeological Trusts on behalf of the Welsh Ministers and can be accessed online.</p> <p>1.32 LDPs are site allocation documents, with locally specific policies only where evidence supports a different approach to national or SDP policy. LDPs need to be prepared quickly and kept up-to-date. They must be simple, short and locally focused. Preparation should be on a footprint that reflects evidence on how areas function, in terms of local housing markets and travel to work etc. In most cases this will mean that Joint LDPs should be prepared, <u>covering a number of local authority administrative areas</u>. LDPs have to be in general conformity with the NDF and SDP and cannot be adopted unless they are.</p> <p>2.60 In rural areas the opportunities for reducing car use and increasing the use of walking, cycling and public transport are more limited than in urban areas. In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes when</p>


Reference	Comment
	<p>compared to the rural area as a whole. Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated by <u>local authorities</u> and be identified as the preferred locations for most new development including housing and employment provision. The approach should be supported by the service delivery plans of local service providers.</p> <p>2.61 Due to their strategic nature new settlements or major urban extensions of 1,000 or more dwellings, which will have significance beyond a <u>single local authority</u>, should only be proposed as part of a joint LDP, SDP or the NDF.</p> <p>2.84 Local service centres, or clusters of smaller settlements where a sustainable functional linkage can be demonstrated, should be designated <u>by local authorities</u> and be identified as the preferred locations for most new development including housing and employment provision. The approach should be supported by the service delivery plans of local service providers.</p>
<p>Land Use Planning Matters – General</p> 	<p>It is difficult for the reader to identify those subject areas where land use planning should be intervening. Words like ‘encourage’ and ‘promote’ need strengthening or taken out. Sometimes there appears to be an assumption that land use planning can play a meaningful role when in reality it can only be slightly connected – some examples are provided in the response. Providing clearer guidance on what is expected would be helpful.</p> <p>With the potential increased role of Planning Policy Wales in the absence of an adopted Plan greater precision in language is necessary.</p>
<p>The Historic Environment – General</p> 	<p>The document with regards to the historic environment is concerning because many aspects of the previous version (PPW 9) have disappeared, with the previous chapter having been cut down significantly. Although there are laws in place for some of the historic assets that are registered, the previous version of PPW provided protection for non-designated features and this should be carried through to the new document. This will also ensure consistency between differing local planning authorities’ interpretation of the content. As the draft currently stands, the guidance is much more ambiguous than the current version. Due to this, the structure, headings and guidelines within PPW 9 should be maintained within PPW 10 and include objectives (PPW9 6.2), responsibilities for the historic environment including the organizations and their responsibilities (PPW9 6.3), guidance on development plans and development management. It would also be useful to make reference to the various relevant Acts and Technical Advice</p>

Reference	Comment
	Notes which are currently absent. There are a number of instances where the word 'should' has been used instead of 'must'. It is considered that the word 'must' should be used in the following paragraphs as there are statutory implication - 5.86, 5.87, 5.88, 5.92 and 5.103. Page 18 What is a Sustainable Place?' – 'Protect, promote and conserve the historic environment' add the word 'enhance' after conserve.
Supporting documentation/ Glossary of Terms – General 	The References section at the end of each chapter have also gone  A Glossary of Terms is needed.
Welsh Version of the Draft Document	The Welsh Document needs proof reading. It appears to have all been translated rather than the relevant bits which have been amended. Therefore, parts of the text which have not changed in the English have been changed in the Welsh changing the meaning in some instances. Only the parts of the document that have changed should be translated.
Placemaking	
2.7	5 <sup>th</sup> Key Planning Principle: 'Polluter Pays Principle' and 'Precautionary Principle' would benefit from a footnote to define these, for clarification to the reader.
2.6	Page 16, symbols: Any particular policy could relate to any number of these – it depends on the situation. All these ways of working are all methods that the land use planning system can adopt to achieve the aims of getting the Welsh language to thrive and improve the environment.
2.9	Reference to 'friendly' in the sustainable places box seems too ambitious for planning practice to deliver.
2.9	To ensure a link with the well-being goals the statement should include ....where the Welsh language thrives.  Diagram that follows paragraph 2.9 Page 18, diagram Difficult to read. This would better belong in promotional literature.
Key Planning Principles	
2.9	Text that follows paragraph 2.9 Page 17, Principle 1 and 5 The sentence "applying the precautionary principle...." In Principle 5 should also be in Principle 1 in relation to climate change and flooding.
2.10	The paragraph makes reference to economic matters but not about protecting the countryside, the value of biodiversity and the need to protect it are as much about a sense of place as economics.

Reference	Comment
National Place Making Outcomes	
2.16	The statement below 2.16 should be more challenging, suggest 'acknowledging the importance of ensuring a thriving Welsh Language' and /or 'supporting the efforts to create bilingual places'
2.16	Diagram below 2.16 Page 20, last point The commentary on the Welsh language here appears to be at odds with para 1.8 of the draft Planning Policy Wales which advises about not discriminating against nor favouring any particular group or members of society. Can this be clarified please?
2.16	Diagram below 2.16 Page 21 (page number missing on print out), second point Existing buildings should only be re-used if they are appropriate. Not all existing buildings are suitable for re-use and it may sometimes be preferable to replace them. This can be rectified by adding the word 'appropriate' in before 'existing'. The outcome is however difficult to understand. Could de-risking be explained?
2.16	Diagram below 2.16 Page 22, 3 <sup>rd</sup> point The activity needs to be appropriate.
2.16	Diagram below 2.16 Page 22, first point What is a soundscape? Glossary of Terms?
2.16	Diagram below 2.16 Page 22, last point This just needs to say that we will embrace new technologies for power.
Sustainable Places and Well-being	
2.17	Just below para 2.17 Page 23, diagram, first column of diagram: Need to make reference to reducing risk – this is particularly important in terms of climate change, coastal change and flooding and the key objective of WG's approach. It needs to be reflected here. The inclusion of Welsh language (meaning Welsh speaking people or communities) needs clarifying – see previous comment), unless other languages (meaning people or communities speaking other languages) are afforded the same protection. Should the reference relate to encouraging a thriving Welsh language where land use links can be made? Consider that there should be more positive wording used in relation to 'natural and unique places'
2.22 and 2.23	Would these paragraphs be better at the beginning of Planning Policy Wales? It would be useful if the term 'should' was explained? Does it mean that if authorities don't do as 'expected' then there will be an objection to a Local Development Plan or a call in? Is it a requirement or choice?

Reference	Comment
Assessing Sustainable Benefits	
2.24 	National Parks The language of this paragraph would seem to be at odds with National Park purposes, the role of the socio economic duty in pursuance of those purposes and the Sandford Principle – Environment Act 1995. Some recognition of the priorities for National Parks as set out in legislation is needed. How will the term ‘robust evidence’ be expected to be interpreted?
2.25	Should landscape not be referred to under ‘Environmental Considerations’? It will be difficult to quote the relevant reference as there are so many bullet points.
2.25	Page 26, 3 <sup>rd</sup> bullet point on page- See earlier comments on Welsh Language – is this compliant with earlier statements in PPW?
2.26	The use of language in this paragraph prioritises local authority departments with the word ‘particularly’. There are many other Officer disciplines that have equal priority such as in landscape protection, waste, historic building conservation, and pollution control. Prioritising certain departments contradicts previous statements in relation to collaborative and holistic consideration.
2.31 and 2.32	This needs to take into account climate change and the need for adaption during the life of the development.
2.43	This para is difficult to understand and appears to try and effect action for which planning authorities have little or no control. The second sentence should be deleted. Planning authorities can effect change to the physical environment but not areas of work which are the responsibility of other agencies.
2.51	Who will be undertaking these Impact Assessment, need clearer guidance on what areas of particular sensitivity or importance for the language are (for example a series of criteria)
2.47 to 2.51	See earlier comments on Welsh language.
2.60	Further clarification needed on type of service delivery plans
2.66	The work undertaken by SNPA in facilitating the reclamation of derelict lead and zinc mines in the Gwydyr Forest is a good example of this.
2.78	Should include ‘unless local evidence suggests otherwise’ e.g. in the interests of retaining openness and preventing the further coalescence within relatively small areas and within a National Park context, new affordable housing would be inappropriate within the green wedge.
2.78, last bullet	‘Small-scale’ needs to be defined.
2.82	Paragraph 2.82 refers to infilling or minor extensions where it


Reference	Comment
	can be demonstrated that the proposal will increase local economic activity. Can this be clarified as to what is expected? This is not included in the current Planning Policy Wales.
2.83	This is a repeat of para 2.60 in part.
2.84	Reference to 'local authorities' should read 'local planning authorities'.
Active and Social Places	
3.100	The last sentence of this paragraph does not appear to be needed.
3.103	Planning authorities have no control over provision of community facilities – strategic or otherwise.
3.107	Paragraph 3.107 refers to the local development plan addressing deficiencies in the provision of recreational open space. This can only be done where there is a deliverable scheme to address the deficit proposed through the candidate site process. Local planning authorities can only require provision of a development where the development itself generates that need.
3.119, last bullet	Clarification is needed on what is meant by the term 'facilitate'. Determining planning applications or allocating land in Local Development Plans is as far as a planning authority's remit goes.
3.12	Support inclusion of this statement. However, the ability to be flexible will need to be an explicit requirement in national policy and/or building regulation for whatever the subject area.
3.17 	Housing Growth: The text of Planning Policy Wales 10 is written to advise that there will be housing growth in every planning authority area. There appears to be renewed emphasis on this through its inclusion in Planning Policy Wales 10. It appears to be a standard assumption for all Local Development Plan comments by Welsh Government. This is not the case in the 3 National Park areas where a decline in population and household numbers is forecast. See for example the first 2 bullets of paragraph 3.17. The implication of this approach is to assume a one size fits all for everyone. National planning policy expects planning authorities to provide market housing and on the back of that provide affordable housing. National planning policy does not see a role for affordable housing (100%) except in limited circumstances. With that approach comes a requirement to provide market housing to deliver affordable and all that goes with is such as higher land value expectations versus exceptional land release values. Once the principle of market housing is accepted on site then the negotiation can result in zero affordable housing provision which was not the original intention in locations where there is no need for market housing in the first place.



Reference	Comment
	The 'model' of affordable housing provision through planning could do with a re-visit as the expectations on delivery by this means are too high and the issues that the 3 National Park Authorities face will not doubt be experienced by a larger number of planning authorities as the population generally is aging.
3.18, 3 <sup>rd</sup> bullet	Infrastructure provision is not the responsibility of the planning authorities. Planning authorities can work with the relevant agencies (mostly Councils and WG) but it doesn't not develop them.
3.18, first bullet	The first bullet is attempting to be all-encapsulating but it is not clear what is meant by 'sustainable access'. The planning authority can help to provide where new build and building regulations require accessible buildings, but access to such facilities generally is the remit of other agencies.
3.18, last bullet	See earlier comments on Welsh language and query the role of land use planning.
3.21	3.21 Are housing strategies prepared by local authorities any more?
3.22	3.22 Should refer to local 'planning' authorities? and not just local authorities. Does neighbouring authorities mean 'planning' authorities? – same paragraph.
3.23 	<p>Older peoples' housing needs: Paragraph 3.23 refers to planning authorities meeting the needs of older people and people with disabilities. This appears to be new in the policy statement and it is unclear what the expectations are or how they can be achieved. Paragraph 3.29 refers to 'barrier free housing' but only in terms of promoting it. As it stands life time home standards are only a requirement for Social Housing Grant supported schemes that are built to DQR standard. There are expectations by commentators on plan preparation that the local planning authority can 'impose' life time standards on all new housing. There are issues arising from this expectation and lack of clarity in national planning policy.</p> <p>LPA's would have to both evidence need and consider viability with other S106 requirements as a whole to justify a Local Plan policy requiring the Lifetime Homes Standard.</p> <p>Overall need should not be that difficult to evidence as we have an ageing population. The requirement of provision on specific sites could prove trickier as local factors will come into play and applicants argue against requirements. Viability is another matter with ever increasing competing priorities for the fixed S106 pot, notwithstanding the cumulative effects that other WG policies such as sprinklers or moving to zero carbon will have on</p>




Reference	Comment
	<p>increasing costs and thus developability.</p> <p>No private development would be pursuing the lifetime home standard as they only need to comply with the Building Regulations and developers do not normally go beyond what they need to.</p> <p>The National Parks Wales view is that given the difficulties arising from viability testing of sprinklers in the recent past that this issue should be resolved at a national level one way or another. The tease of 'promoting' will only aggravate local commentators (and does already) when local planning authorities fail to incorporate requirements in their Plan's. WG should decide on whether they should be mandatory requirements for all new dwellings to be built to Lifetimes Homes Standards and that this be done via the Building Regulations rather than Planning, but please take viability into account before making such as decision.</p>
3.24	Notwithstanding previous comments on Welsh language, 'Welsh language' considerations in the context of housing requirements need to be defined.
3.26	Local Housing Market Assessments: Paragraph 3.26 appears to suggest that Local Housing Market Assessments are jointly prepared by housing authorities and local planning authorities. National Parks Wales' understanding is that local housing authorities are the lead (and commissioners) and planning authorities provide a supporting role. Can this phrase be clarified? There appears to be a lack of understanding as to the difference between a local planning authority, local authority and national park authority throughout the document.
3.28	<p>Terminology</p> <p>Paragraph 3.28: Terms like 'allocation' require definition. Planning Policy Wales could do with a glossary of terms.</p>
3.33	What's the difference between a settlement extensions and new development? Is new development a satellite development?
3.38	Proposals must still accord with the relevant policies of the LDP and national planning policy. If the LDP has to accord with the place-making outcomes, this statement is superfluous. The place making outcomes are not specific enough to make a judgement on a planning application.
3.41	<p>Occupancy controls: Paragraph 3.41 refers to market housing being not subject to the control by the <u>local authority</u>. The deletion of the word 'planning', i.e. local planning authority gives this a whole different meaning which is assumed was not the intention.</p>
3.43	Welcome the retention of this para.
3.46	Why is the assumption that the sites are small in number in

Reference	Comment
	relation to total sites – this assumes growth when it is not always the case. Please see comment regarding housing growth earlier.
3.49	Gypsy and Travellers Suggest referring to the need to include of a criteria based policy as well to deal with unforeseen demand.
3.52 to 3.53	One Planet Development The draft no longer refers to the ecological footprint requirements and the nature of construction (included in Planning Policy Wales 9). It cross refers to TAN6 but not to the Practice Guidance for One Planet Development. Can Welsh Government please clarify its position and approach regarding One Planet Development?
3.54	Town centres – especially smaller towns are becoming less popular with users – people prefer out of town shopping and frequently link socialising with other activities such as walking. Planning policy is failing to respond to changes in patterns of behaviour which is rendering many town centres as down-trodden and unsustainable.
3.6	A planning authority can require affordable housing but the quality of provision is not something that it can regulate. This has to be done by other agencies.
3.71	'Town centres first' is not fully defined. A footnote could be added.
3.74	Need to consider multiple uses in individual buildings and new businesses e.g. mini breweries.
3.76	This paragraph is less clear in explaining the approach than its equivalent paragraph 10.2.16 in PPW Edition 9.
3.96-3.97	Evening and Night time Economies represent a newly singled out sector to which greater flexibility is given for the location of premises. An approach of mitigation rather than prevention of these uses in inappropriate places is portrayed. The wording should be clearer on the need to prevent unacceptable detrimental impacts upon residential amenity, town centre vitality, vibrancy and attractiveness.
3.154	Planning authorities have no control over charging policies for parking.
Productive and Enterprising Places	
4.6 to 4.13	This layout is repetitive and potentially constraining. Better to judge each proposal on its merits that set out here what it can achieve under various headings.
4.17	Typo – insert 'be' after need to
4.18	First bullet: If delivery of proposals and allocations in the LDP is

Reference	Comment
	key then this is not always possible. Where need is for small sites and premises unless public money is available they will not get delivered.
4.26	Agree - however if mitigation is impossible the consent must not be granted and a different solution sought
4.30	Difficult to achieve in designated areas where additional antennas, height increases or more robust lattice towers will push the mast towards being unacceptable.
4.69	Consider given the importance placed by Welsh Government on the Welsh Enterprise Zones that there is not more reference and guidance associated to them within the document.
4.106	Might not be possible to come up with credible targets in areas such as National Parks where small-scale and micro generation takes place. Difficult to get an accurate estimate of the resource in terms of installed capacity. Also the capability of the local electricity distribution network to accept new connections is limited. New overhead connections should not be permitted within National Parks.
4.148	Now that management of radioactive waste is a devolved matter Welsh Government needs to provide planning guidance on the decommissioning to Nuclear Power Stations.
4.205  	<p data-bbox="491 1025 954 1059">Minerals in National Parks</p> <p data-bbox="491 1104 1410 1352">Paragraph 4.205 of PPW 10 draft advises ‘A minimum ten year landbank of crushed rock and minimum seven year landbank for sand and gravel should therefore be maintained during the entire plan period of each development plan <u>except within National Parks and AONBs, unless agreement is reached for other authorities to make a compensating increase in their provision.</u>’</p> <p data-bbox="491 1397 1410 2004">This does not reflect current national planning policy which prohibits minerals developments save in exceptional circumstances in National Parks as expanded on in Minerals Technical Advice Note 1. The current Minerals Technical Advice Note 1 more accurately reflects the approach – paragraph 46. ‘In some mineral planning authorities it may not be possible or acceptable to provide an adequate current or extended landbank. In National Parks and Areas of Outstanding Natural Beauty (AONBs), Minerals Planning Policy Wales states that mineral extraction should only take place in exceptional circumstances and may be undesirable in other areas that have been identified for their natural heritage importance. In some areas, suitable resources are not available geologically or are not appropriate for extraction because of environmental designations or the need for protection of existing and future amenity. The RAWPs should consider the assessment of the "environmental capacity" of the authorities in each region to</p>

Reference	Comment
	supply aggregates (see also paragraphs 29 and 50 below).’
4.22	This paragraph does not seem to be needed.
4.24	Not sure how you would ‘encourage’ telecommunications etc in land use planning terms.
4.40	This para has no purpose.
4.65	See comment on para 4.18 above – small sites are typically unaffordable and therefore undeliverable. ‘SME’ could be defined in a footnote for reader clarification.
4.84	Suggest that development must be sympathetic....
4.84	This para should be in The Rural Economy section.
4.85	Peculiar phrasing – ‘There will be scope...’
4.87	Maintenance of tourism facilities is not a planning matter.
4.91	We can allocate – but delivery is key to LDPs and this cannot be guaranteed. This the para needs to be reworded to take this into account.
4.97	The scale of these developments must be strictly controlled in National Parks.
4.96 & 4.213 	These paragraphs refer to a regional need for minerals in addition to a UK need. Paragraph 4.196 goes on to refer to controls that would be particularly appropriate to National Parks and other designations. This approach conflicts somewhat with paragraph 4.224 which refers to the exceptional circumstances upon which minerals development can take place in National Parks, the first being the need for the development in terms of UK mineral supply. It should be made clear that a regional need would therefore hold less weight when considering the impact of development proposals upon National Parks and AONBs in these circumstances.
4.191	TAN 21 needs to revised to take account of the possibility that VLLW and LLW radioactive wastes will be disposed of on-site at Trawsfynydd
Distinctive and Natural Places	
5.6	Landscapes – the landscapes (not just biodiversity) also need to be valued for themselves – ie as a resource and as a visual attraction.
5.7	What is meant by ‘sufficient scales’?
5.11	See previous comments on Welsh language
5.13	Clarify wording – ‘Problems should be prevented from occurring....’ – what is this intended to mean?
5.16	2 <sup>nd</sup> bullet - Inclusion of this statement is welcomed.
5.24 to 5.27 	National Parks: Paragraphs 5.24 to 5.27 are edited versions of paragraphs 5.3.3 to 5.3.7 of Planning Policy Wales Edition 9. The result is confusing and doesn’t reflect the role of National

Reference	Comment
	<p>Park Authorities which are not referred to. As a result the ubiquitous referencing to planning authorities does not reflect correctly the specific role of National Park Authorities which are planning authorities in their own right. Also the role of other authorities is not accurately set out. The previous wording should be reinstated.</p> <p>The opportunity should be taken to make it more explicit how landscapes (and designated landscapes) can contribute to a 'Healthier Wales' where physical and mental health are as good as possible. The document, not only in this section, could also include the concept of how natural beauty and tranquility can play its role in the health of the people of Wales.</p>
<p>5.28</p> <p style="text-align: center;"></p>	<p>National Parks: '5.28 Proposals in National Parks and AONBs must be carefully assessed for their effect on those features which the designation is intended to protect, and the special qualities of designated areas should be given great weight in development planning. The contribution that development makes to the sustainable management of the designated area should be considered.' This paragraph requires further work as it seems to move between development plan work and development management work and misrepresents the weighting to be attached as per the Environment Act 1995. Please re-instate paragraph 5.3.6 of PPW 9.</p> <p>The sentence re 'sustainable management' need clarification.</p>
<p>5.63</p>	<p>The original policy in Planning Policy Wales defined them as "irreplaceable habitats" which should be protected from development.</p> <p>But the revised document changes that to "irreplaceable natural resources", and says instead that "every effort should be made" to prevent damage and "unnecessary loss".</p> <p>The original policy said very clearly that developments which significantly damage irreplaceable habitats should not go ahead. The latest draft only says they should be protected from unnecessary damage.</p>
<p>5.77</p>	<p>It is not clear if historic assets of special local interest includes vernacular and traditional buildings</p>
<p>5.81</p>	<p>Suggest adding 'Any <i>acceptable</i> change' in the last sentence for additional clarity.</p>
<p>5.84</p>	<p>The word 'desirability' should be removed from this paragraph as the word weakens the preservation on this point.</p>
<p>5.89</p>	<p>Last sentence referring to 'exceptional cases' and 'public interest' could usefully be clarified. With no definitions provided it can be potentially interpreted in many different ways. Any proposed development which would damage the character or appearance of a conservation area should be carefully considered and clearly justified against well-defined policy.</p>

Reference	Comment
	Suggest removing this sentence or providing additional clarification on the context to which this may apply.
5.103	In relation to archaeological remains; the word 'may' should be replaced with 'should'. As a National Park, whereby conservation is one of the primary aims, any archaeology is an incredibly important consideration in all and any development.
5.105	Useful to include the tests set out in Cadw's Conservation Principles, as included in the current PPW Edition 9 at paragraph 6.5.29. Reference to these tests should be maintained for clarity when considering development proposals, to ensure clear links between the proposal and defined heritage benefits are available.
5.106	Unclear why reference has been made to outline planning permission here when it should only granted through full planning permission.
5.114	The national strategy for changes resulting from climate change and sea level rise is to reduce risk. It is important that that strategy, rather than 'addressing risk', is included in this document.
5.115	Useful to include development already in 'at risk' areas and the potential need for re-location.
5.116	Other forms of development, and not just tourism, may be appropriate.
5.116	Could the term 'sensitive uses' be explained? Does it mean 'vulnerable development' as in TAN15?
5.118	Last two sentences relating to estuaries and open parts of coast – this is not a land use planning matter.
5.121 to 5.123	This should refer to the need to allow for relocation out of risk areas, where appropriate.
5.127	Which public bodies?
5.174	Last sentence could usefully be more explicit that the risk refers to life and assets and means both now and in the future.
5.176	The development of less vulnerable assets permitted to located in C2 areas also requires an acceptance of the potential impact on those assets and a potentially a shorter life-span.
5.176	Last sentence – it is not just planning authorities that should recognise this but applicants too.
5.181	Reference to the need for early action is welcomed.
5.186	De-risking should also include re-location of existing development in identified risk areas.