

Senedd Cymru
Y Pwyllgor Newid Hinsawdd, Amgylchedd a
Materion Gwledig
Craffu ar Fframwaith Datblygu Cenedlaethol
Cymru
CCERA(5) NDF(v2) 07
Ymateb gan Tri Awdurdod Parc Cenedlaethol: Parc
Cenedlaethol Eryri, Parc Cenedlaethol Bannau
Brycheiniog, Parc Cenedlaethol Arfordir Penfro

Welsh Parliament
Climate Change, Environment and Rural Affairs
Committee
National Development Framework for Wales
CCERA(5) NDF(v2) 07
Evidence from Three National Park Authorities:
Snowdonia National Park, Brecon Beacons
National Park, Pembrokeshire Coast National Park



1. Introduction

2. Covering 20% of Wales - our 3 National Parks are amongst our oldest spatial planning designations.
3. Future Wales - The National Plan 2040 does not demonstrate how the Welsh Government's own priorities for designated landscape (in the form of '*Valued and Resilient: The Welsh Government's Priorities for AONBs and National Parks*', 2018) are incorporated in to the framework. It is not clear either from the Welsh Government's report of consultation¹ whether the issues we raised during the process have been considered – with no reference to this in the Arcadis report (consultants appointed by the Welsh Government). It does not appear either that the Welsh Government had any regard to the National Park Management Plans, which are plans of national significance².
4. Clarity is required on how Welsh Government can designate a regional growth zone in the Brecon Beacons National Park or a potential *Development of National Significance in Snowdonia* without full consideration of the above policy or without application of the Major Development test.
5. The National Plan 2040 makes reference to Strategic Development Plans throughout the document. There are concerns about the role and purpose of NPAs in the Strategic Development Plans. As special purpose Authorities, National Park Authorities (NPA) embrace a spatial partnership of national and local interest where Welsh Government appointees work together with members appointed by Unitary Authorities in the national and local interest.
6. The changes we propose to help deliver National Park statutory purposes and the protection of their special qualities should not require wholesale changes to *Future Wales - The National Plan 2040*. A clear reference to there being a presumption against large scale developments within National Parks is important, Welsh Government officers have previously advised that this is the case and suggested that this was the reason for the omission of a National Park policy.
7. Our key concerns are focused on six key areas as set out in points A-F (many of which are inter-related), below.

A. Specific Policy for National Parks

8. This issue was raised in our original consultation response.
9. As national designations made by Government Order, of international significance it is considered that *Future Wales 2040*, must include a specific policy, or at the very least some wording, to recognise the significance of National Parks, their purpose, the benefits they have for Well-being and the importance of their protection and enhancement.

¹ Available at: <https://gov.wales/sites/default/files/consultations/2020-09/draft-national-development-framework-consultation-report.pdf>

² <https://www.pembrokeshirecoast.wales/wp-content/uploads/2019/05/National-Parks-Management-Plans-Guideance-English-2007.pdf>

10. The Welsh Government's own policy statement on National Parks and AONBs (*'Valued and Resilient – The Welsh Government's Priorities for Areas of Outstanding Beauty and National Parks, 2018'*) is neither considered in the *'Evidence Compendium Update'* (September 2020) which helped inform the latest iteration of the NDF, nor is it referred to in the list of policy documents which informed the NDF on p10 of the NDF (Sept 20). It is not referred to either in the Welsh Government's Integrated Sustainability Appraisal (ISA) - prepared by consultants Arcadis (See Appendix A of the ISA).
11. Page 14 of *Future Wales 2040* states that "It has policies on issues where the Welsh Government considers them a national priority at this time, or matters which are distinctly spatial and require national leadership." There are policies referring to 'National Growth Areas', Green Belts and National Forests. A specific policy on National Parks (which make up 20% of the land area of the nation), is important given the issues of national significance that the National Parks are currently facing. There are several reasons for this.
12. The pressures on National Parks are as high as ever. These include pressure from inappropriate development, congestion, unprecedented visitor numbers, reliance on the private car, housing problems to name a few. The reason National Parks were formed in the first place in the aftermath of the 2nd World War is as relevant and important as ever. More than ever, people need access to beautiful landscapes, nature and cultural heritage for their mental and physical well-being. The lifting of the Covid-19 restrictions in June demonstrated this, as people flocked to National Parks in unprecedented numbers.
13. As these pressures on National Parks intensify, the risk of unsustainable or inappropriate development increases – be it unaffordable housing, increases in holiday lets at the expense of local people, car dependent development, car parking problems and associated congestion. There is also a danger that as we plan for post Covid economic recovery, that there will be pressure to encourage development that could erode the Special Qualities of our National Parks. These pressures are happening in each of the 3 National Parks in Wales, Our concerns are further exacerbated by the additional pressure which will be brought to bear on our designation through the collective action of Strategic Development Plans.. It is for these reasons that this issue needs to be addressed at national level in the National Plan during these unprecedented times. Further detail is also provided in our original consultation response.

B. Transport in National Parks

14. There are many aspirational statements in the National Plan that refer to the need to reduce reliance on the private car, and the ambitious objective to create a decarbonised society.
15. It appears as though these aspirations will perhaps understandably be focused upon urban areas, with much reference to metro systems – for example Policy 12 (Regional Connectivity) refers to the opportunities for higher density, mixed-use and car-free development around metro stations.
16. However, urban areas do not have the monopoly on this problem, transport is equally relevant to rural areas. Over recent years all 3 National Parks have experienced significant and increasing congestion, full car parks, illegal and hazardous parking and an almost complete reliance on the private car to get to our beauty spots. This was highlighted on an almost weekly basis in the press and media this Summer, as unsurpassed numbers accessed National Parks in their cars. Not only is this bad for the environment and climate (and even bad for the economy), it also prevents people without a car from visiting National Parks (arguably the people who would benefit most from them).
17. Again such a significant but deep-rooted problem, which happens on a national level in our nationally designated landscapes requires recognition and support to resolve it through the *Future Wales 2040*.
18. Breaking this cycle of car dependence in our National Parks will be a tough nut to crack, arguably harder to achieve than in urban areas. Again, it is for this reason that support for addressing this should be provided in *Future Wales 2040*.
19. Snowdonia National Park Authority have recently initiated a transportation and parking study, but this will require a significant joined up and strategic approach to help achieve its ambitious aims. Support through the *Future Wales 2040* would go a long way to achieving these aims across all of our designated landscapes.

C. Housing in National Parks

20. This issue was raised in our original consultation response. However, we believe the issue needs to be addressed in further detail in *Future Wales 2040* to address this issue which is intensifying across the nation.
21. The NDF states that there is a need to “focus on increasing the delivery of social and affordable homes....The Welsh Government is targeting its housing and planning interventions towards achieving this aim within the broader context of increasing supply and responding to different needs, including our ageing society and climate change.”
22. National Parks, in particular the honey pot areas, are facing significant housing pressures, which create real challenges in developing sustainable communities. National Parks have generally tried to focus their housing development towards local need, but this has come under significant pressure recently in particular with the rise of holiday rental market such as AirBNB.
23. To deal with these problems, it is suggested that *Future Wales 2040* should have a specific policy for ‘locally derived housing’ (not just local affordable housing) – thereby helping local people who do not fall within the strict definition of ‘affordable’ housing but are struggling to get access to the open housing market. This bold approach would help communities which are now facing extreme housing pressures, but would only be workable with support in a national plan.
24. This issue could also be supported through the policy for National Parks which has been referred to above.

D. Welsh Language

25. Linked to the above, the aspirations of a thriving and vibrant Welsh language needs further and stronger support from various policy areas in the NDF. As has been referred to above, several Welsh speaking communities are under immense pressure, particularly housing pressure. As people move to beauty spots to live or retire, buy second homes or increasingly use the existing housing market for holiday lets such as AirBNB, local people are excluded from the housing market. This issue needs addressing at national level – and *Future Wales 2040* would be the ideal mechanism to achieve this.
26. In addition to appropriate housing, creation of employment opportunities will also sustain communities. The national response to Covid has seen a sharp rise in working from home employment opportunities. Rural communities need to be supported by appropriate infrastructure to enable this, in order to retain diverse thriving communities. Infrastructure such as high speed broadband, 4G is required in rural and urban settings

E. Appropriate levels of Development in National Parks

27. The principle of allowing Major Development in National Parks requires a specific test to be satisfied – and *Future Wales 2040* is silent on this key issue. Again, this raises issues of transparency, which may lead to confusion and uncertainty further into the process (and uncertainty inevitably leads to delay). The Major Development Test is referred to in the NDF's Evidence Compendium Update – September 2020. However, such a critical policy consideration should not be relegated to a background paper, and lacks transparency.
28. Planning Policy Wales (PPW) states *"In National Parks or AONBs, special considerations apply to major development proposals which are more national than local in character. Major developments should not take place in National Parks or AONBs except in exceptional circumstances."*
29. Specifically relating to this, PPW requires the following issues to be addressed with regard to Major Development:
- *the need for the development, in terms of national considerations and the impact of permitting it or refusing it upon the local economy;*
 - *the cost of and scope for providing the development outside the designated area or meeting the need for it in some other way; and*
 - *any detrimental effect on the environment and the landscape, and the extent to which that could be moderated and/or mitigated.*
30. This policy has its foundations in the 'Silkin Test' which states major development in National Parks must meet 3 main criteria, which are:
1. it must be in the National interest;
 2. there is no practicable alternative to development in a National Park;
 3. must be built in a way that minimises detrimental effects on the environment.
31. We believe that the NDF fails to address these principles in its direction. By way of example we draw the Committees attention to two examples of this policy disconnect (a) the identification of Trawsfynydd as a potential site for a Small Modular Reactor within SNPA and (b) the designation of a Regional Growth Zone around Brecon within BBNPA

(a) Trawsfynydd Small Modular Reactor

32. The NDF States: "Proposed developments associated with the Isle of Anglesey Energy Island Programme, Wylfa Newydd and **Trawsfynydd will be supported in principle** as a means to create significant economic benefits for the area as well as generating renewable or low carbon energy."
33. **"Trawsfynydd is a potential site for a Small Modular Reactor"**, building on the existing sector-specific technical capacity and expertise available locally and creating a new nuclear industry growth zone. The site is in a unique position, having previously been a former nuclear power station with the necessary infrastructure and local skills in place. The site lies within the Snowdonia National Park and major development here should be subject to the principles in Planning Policy Wales. At the detailed planning stage, it will be necessary to consider design and impact upon the environment and landscape of the National Park including potential mitigation."
34. It should be emphasised at the outset that the provision of a site that provides high quality jobs in an area of relatively low wages is strongly welcomed.
35. However, given that *Future Wales 2040* is part of the statutory development plan, it is not at all clear what status a potential nuclear site has. This may lead to confusion and therefore potentially delays further into the process. There was a relatively vague reference to Trawsfynydd in the first draft of the NDF. This now appears to have become a slightly more formalised proposition in the latest iteration, stating it "is a potential site for a Small Modular Reactor". Identifying Trawsfynydd as a potential nuclear site in *Future Wales 2040*, without directly referring to the Major Development test is at best unclear and at worst misleading.
36. It is therefore suggested that the principles set out in the Major Development and Silkin Test are applied (albeit at a strategic level) prior to identifying the site as a potential SMR site in *Future Wales 2040*. This would not only highlight the test / policy that has to be applied to such development, but also would provide an indication as to whether such a proposal could meet this test. This would be a more transparent way of including such a significant development proposal in a National Park.

(b) Regional Growth Zone within the Brecon Beacons National Park

37. *Future Wales* as laid at the Senedd rightly recognises the Mid Wales region as a region in its own right and this is both welcomed and supported. However, we cannot agree that there is a need for the identification of a Regional Growth Zone in and around Brecon. Regardless of the levels of growth identified in support of this aspiration within this iteration of *Future Wales*, we have significant concerns that this will create an expectation from stakeholders for growth at levels far beyond the environmental capacity of the area in direct contradiction to the purposes and duty of the National Park. Given that future economic growth within the region (as envisioned by Policy 26) will be directed by a future CJC which will exclude NPA representation (the draft regulations for the establishment of CJs demonstrate that NPAs will be represented only in so far as Strategic Development Plans are concerned) but will have jurisdiction over our area – our concern for the sovereignty of our designation in decision making grows.
38. Our concern is further escalated in relation to the assessment of the Brecon and the Border Growth Zone against the ISA and Habitats Regulations. Here having assessed Policies 25: *Regional Growth Areas Mid Wales* & 26 *Growing the Mid Wales Economy*, which include the identification of a regional growth zone within the Brecon Beacons National Park, Table 3.3. on page 75 of the ISA shows:

- negative/adverse results for sustainability objectives relating to landscape and townscape, historic environment, biodiversity and geodiversity and natural resources; and
- positive and significantly positive for employment and economic growth.

This result demonstrates a clear conflict with the National Park purposes and is a clear indication that further work is necessary on to resolve the plan's approach towards National Parks.

39 The assessment of these policies also notes the HRA of the NDF has ruled out an adverse effect on a Natura 2000 site as a result of P25, P26 and P27. It is not clear how this is the case. The overall conclusion of the HRA states:

40. No adverse effects on integrity are anticipated as a result of implementing the NDF policies (alone or in-combination) because:

- Table 7 of the Appropriate Assessment sets out the type of impacts which could occur through implementation of the policies and identifies avoidance/mitigation measures which must be adhered to when producing lower-tier plans and projects to ensure no adverse impacts on Natura 2000/ Ramsar sites.
- legal requirement for lower-tier plans and projects to undertake HRA.

41. Yet the Future Wales – The National Plan 2040 does not contain detailed policy to secure each of the mitigations identified in Table 7 of the HRA. Indeed the text of the plan pushes all assessment work onto strategic and local tiers of development planning: in effect undermining the delivery of each and every policy in Future Wales – The National Plan.

Development at the lower-tier plan or project stage will need to demonstrate there are no adverse effects on the features for which a Natura 2000 site has been designated, and Future Wales does not support lower-tier plans or projects where this is not concluded.

42. Of great concern is that text in the plan mis-represents the findings of the HRA.

*The Habitats Regulations Assessment concludes that, on the assumption that the findings of the Habitats Regulations Assessment are adopted at the lower- tier planning or project scales, adverse effects on the integrity of Natura 2000 sites can be avoided **as a result of implementing the policies within Future Wales** (bold emphasis added).*

43. How can this be the case when the HRA states: *It is not possible at this high level to identify an extensive list of all plans and projects which may lead to in-combination effects together with the NDF.*

44. The difference between the findings of the Assessment and its reporting and representation within the NDF are not just points of process or accuracy. They are fundamental to the understanding of the deliverability of the NDF within a wider legislative and policy framework which seeks to protect our most valued natural resources.

E. SDPs

45. Both the Major Development Test, and the Silkin test and Welsh Government Priorities for National Parks referenced above provide clear context relating to the scale of development acceptable within National Parks.
46. Future Wales now identifies that Strategic Development Plans must be produced within each region and that matters of housing provision, economic development and scale and location of growth will be matters for SDPs and not a LPAs LDP. We have significant concerns that the sustainable development of our National Parks could be peripheral considerations within an SDP where the gravity of political power will lie outside the sphere of designated landscape management.
47. We believe that the contribution that National Park Authorities can actually make to strategic development plan production could be valuable, clearly there may be areas where National Parks could and should contribute to wider strategic plan making, for example in relation to sustainable transport, grid connections, green infrastructure or tourism. However, in such circumstances, it should be for the NPA to **opt into** a Strategic Development Plan area, rather than a default position of inclusion.
48. We believe that the contribution that National Park Authorities can actually make to strategic development plan production will be dwarfed by the resource it would take to service their creation. By way of example, the creation of the fourth mid wales region means that the BBNPA is now expected to resource production of three SDPs whose value will be mostly felt outside of its area.
49. Due to concerns on resources and appropriate skills we implore the committee recommends that chapter 5 of *Future Wales* is amended to ensure that SDP areas do not automatically include National Park Authority Areas and the emphasis on the primacy of developing **full** Local Development Plans in National Parks is retained.