

Local Development Plan 2: Consultation draft Preferred Strategy

Name of Committee	National Park Authority
Date	25 th June 2019
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Purpose of Report	Officers are recommending that the Preferred Strategy as appended to this report be published for the purposes of public consultation for an 8-week period commencing July 4 th 2019.
Single Integrated Assessment	The SIA process has highlighted the positive impact implementation of the Preferred Strategy is predicted to have on a range of objectives relating to the future well-being of the National Park and its resident communities. The consultation on this document will provide all interested parties the opportunity to contribute to the development of the Strategy as part of the LDP process ensuring opportunities for collaborative working.
List of Enclosures	<p>Enclosure 1 Single Integrated Assessment</p> <p>Enclosure 2 Equality Assessment</p> <p>Enclosure 3 Preferred Strategy for Consultation</p> <p>Enclosure 4 Initial Consultation Report</p> <p>Enclosure 5 Initial SA Report</p> <p>Enclosure 6 Habitats Regulation Assessment of the Preferred Strategy</p> <p>Links; -</p> <p>Review Report</p>

	Delivery Agreement Topic Papers
Public Interest Test	Not applicable
Recommendation(s)	<p>It is recommended that Members:</p> <p>a) approve the Preferred Strategy for a period of 8 weeks public consultation</p> <p>b)approve the publication of the following documents for observation</p> <ol style="list-style-type: none"> 1. Initial Consultation Report 2. Initial Sustainability Appraisal Report 3. Habitats Regulations Assessment of the Preferred Strategy

1.1 Introduction

The NPA is statutorily obliged to review the Local Development Plan (LDP) every 4 years. The first part of the current review commenced in December 2017 and concluded the need to develop a replacement Local Development Plan for the area (see the [Review Report](#) for more detail). This replacement LDP is referred to as LDP2. The process and timescales for producing LDP2 are set out in the [Delivery Agreement](#) as agreed by the Welsh Government.

In accordance with Regulation 15 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015) the Authority must publish Pre-Deposit documents for consultation as an initial stage in the development of a replacement LDP. The term Pre-Deposit documents collectively refers to the following documents:-

- *Preferred Strategy for Consultation* (Enclosure 3)
- *Initial Consultation Report (CR)*(Enclosure 4)
- *Initial Sustainability Appraisal Report (SA)*(Enclosure 5)
- *Habitats Regulation Assessment of the Preferred Strategy (HRA)*(Enclosure 6)

The purpose of this consultation is to provide key stakeholders and members of the public with an understanding of:-

- The emerging vision and objectives for future development in the National Park and the board strategic levels and locations of growth necessary to support the vision through *The Preferred Strategy*
- How the proposals of the Preferred Strategy contribute towards defined sustainability objectives through the *Initial Sustainability Appraisal Report*
- An assessment of the likely significant effects on protected areas for nature conservation in and around the National Park as a result of the proposals within the Preferred Strategy through the *Habitats Regulation Assessment of the Preferred Strategy*

1.2 The Preferred Strategy

As part of the Review of the existing Local Development Plan the existing Strategy was assessed for its continued relevance to direct development in the National Park for a further 15 years. This review process concluded that it would be prudent to undertake an assessment of options and alternatives to consider alternative approaches which might better enable the Authority to, in particular, maintain a 5 year housing land supply into the future.

Accordingly officers commenced work on the process of developing a Preferred Strategy. The Preferred Strategy has been prepared in accordance with the following sources of evidence and guidance:-

- The results of stakeholder and member consultation (set out in the Initial Consultation Report, Enclosure 4 to this report)
- All baseline Evidence, which includes a review of relevant national and regional guidance (see Evidence Base supplementary information to this report) – [Topic Papers](#)
- The Sustainability Appraisal (incorporating Strategic Environmental Assessment)
- The Review Report

The Preferred Strategy is a high level first step in the delivery of the more detailed ‘Deposit’ LDP (publication anticipated in summer 2020). The Preferred Strategy is best thought of as a framework document, defining the 15 year vision for development in the National Park. The Preferred Strategy seeks to demonstrate, at a strategic level, how the vision could be achieved through the identification of:-

- Levels of growth necessary to meet housing and employment needs
- Broad indication of the distribution of growth to demonstrate how the vision translates spatially
- Strategic topic based policies necessary to implement the vision
- Identification of development sites which contribute to the implementation of the Preferred Strategy (this element is discussed in more detail in the Candidate Site Report, a separate item to this agenda)

The vision for the Preferred Strategy is proposed as the following;

'Our vision is for the Brecon Beacons to comprise connected, accessible and inspiring places for everyone. An exemplar of resilient landscapes, vibrant culture, thriving communities and green enterprise enjoyed and fostered by people who visit, live and work in the National Park.'

In order to realise this, the proposed Preferred Strategy takes a three-fold approach to the future development of the National Park: -

- 1. Providing aspirational growth levels concentrated in the towns of the National Park*
- 2. Setting ambitious policy interventions aimed at developing a Valued and Resilient Brecon Beacons*
- 3. Empowering Communities for future action*

The following section of the report provides an overview of each of the policy strands the Preferred Strategy proposes: -

1. Growth

The Preferred Strategy sets out an aspirational housing requirement of 1,720 homes for the plan period, with 65% of the homes being provided within the Principle Settlements of the National Park. A large proportion of the required housing growth can be provided within the existing housing land supply. The residual housing requirement being largely met through mixed use development sites on previously developed land in Brecon. Some Greenfield sites will be provided around Key Settlements for the provision of no less than 70% Affordable Housing where there are certain mechanisms for delivery.

In accordance with the principle requirements of Planning Policy Wales, to create strong linkages between jobs and houses, it is proposed that the 3Ha of employment land identified as necessary is similarly provided within the existing key settlements, with a focus on utilising previously developed land.

2. Policy Interventions

Stakeholder involvement and the review of evidence identified a number of challenges facing the National Park which has led to the development of a range of policy interventions. The following table (table 1) sets out how it is proposed that LDP 2 addresses key issues:-

Summary of Key Issues relevant to the Brecon Beacons National Park Local Development Plan		Proposed Policy Intervention
<p>a. National Park Purposes and Special Qualities</p>	<p>The effect of development and visitor pressure on the NP, its special qualities, and physical and natural features including the landscape, geodiversity, biodiversity and cultural heritage.</p>	<ul style="list-style-type: none"> • <i>Sustainable Placemaking</i> <p>Policy seeking to concentrate development within principle settlements to limit landscape impacts</p> <ul style="list-style-type: none"> • <i>Environmental Protection</i> <p>Policy seeking to protect environmental assets and making a requirement of major development to provide a Green Infrastructure Plan as part of their planning application.</p> <ul style="list-style-type: none"> • <i>Historic Environment</i> <p>Policy seeking to ensure the conservation of all elements of the Historic Environment, including elements of intangibles cultural heritage inherent in place.</p>
<p>b. Sustainability and Climate Change</p>	<p>The requirement to adapt to and mitigate against the effects of climate change through sustainable development and renewable energy production.</p>	<ul style="list-style-type: none"> • <i>Climate Change</i> <p>Policy requiring all development to be resilient and adaptable to the likely effects of climate change, and in the case of Major Development seeking to ensure carbon neutrality in construction and operation from 2023</p> <ul style="list-style-type: none"> • <i>Sustainable Development</i> <p>Policy seeking to ensure development delivers benefits towards the four pillars of sustainability without compromising the resilience of future generations.</p> <ul style="list-style-type: none"> • <i>Renewable Energy</i> <p>To develop a renewable energy strategy based on place utilising community based energy master planning</p>

Summary of Key Issues relevant to the Brecon Beacons National Park Local Development Plan	Proposed Policy Intervention
	<ul style="list-style-type: none"> • <i>Sustainable Management of Natural Resources</i> <p>Ensuring that all future development proposals utilise natural resources in a way and at a rate that maintains and enhances the resilience of ecosystems and the benefits they provide.</p> <ul style="list-style-type: none"> • <i>Waste</i> <p>Requiring development proposals to demonstrate that waste production has been minimized and reuse/recycling of waste materials facilitated</p>
<p>c. Potential/ Capacity for growth</p>	<p>The capacity for growth in terms of the following:</p> <ul style="list-style-type: none"> - Environmental Constraints - Infrastructure - Utilities - Public service provision. <ul style="list-style-type: none"> • <i>Sustainable Infrastructure</i> <p>Enabling proposals that provide sustainable benefits to National Park Communities</p> <ul style="list-style-type: none"> • <i>Major development in the National Park</i> <p>Enshrining the Silken Principle into Policy for the Brecon Beacons</p> <ul style="list-style-type: none"> • <i>Sustainable transport and active travel</i> <p>Addressing infrastructure constraints within existing communities through the support for active travel within development schemes</p>
<p>d. Housing, including Affordable Housing</p>	<p>The need to provide a mix of dwelling types to meet the housing, employment and demographic needs of the National Park and in particular to meet affordable housing</p> <ul style="list-style-type: none"> • <i>Housing Requirement</i> <p>Providing housing growth at an aspirational level to meet policy drivers around demographic change</p> <ul style="list-style-type: none"> • <i>Affordable Housing</i> <p>Maximising the provision of affordable housing through the planning system through a</p>

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	needs.	range of interventions
<p>e. Economic Development, including Employment opportunities</p>	<p>Need for circular and sustainable economic development, local employment opportunities and links with housing provision in a time of significant uncertainty.</p>	<ul style="list-style-type: none"> • <i>Vital and Viable Retail Centers</i> <p>The retail strategy of the LDP is to maintain and enhance the vitality and viability of the identified retail centers and to support proposals which contribute to the regeneration of the Town Centres</p> <ul style="list-style-type: none"> • <i>Economic Well being</i> <p>Development proposals which are aimed at improving the economic and social well-being of the National Park’s communities will be permitted where they are located in areas which minimise the need to travel or are well connected to areas of residential population through sustainable forms of transport. Providing aspirational levels of employment land to meet emerging employment interventions supported by housing growth having taken into account the environmental capacity of the National Park.</p> <ul style="list-style-type: none"> • <i>Farm Diversification</i> <p>Permissive policy aimed at supporting our farming communities within a post-EU economy</p> <ul style="list-style-type: none"> • <i>Sustainable Tourism</i> <p>Supporting proposals for sustainable tourism and outdoor recreation development which promote opportunities for the enjoyment and understanding of the National Park, whilst ensuring their contribution to the conservation of the Park’s natural beauty, wildlife and cultural heritage.</p>
<p>f. Thriving Communities</p>	<p>Need for natural growth of rural villages to allow</p>	<ul style="list-style-type: none"> • <i>Sustainable Communities</i>

Summary of Key Issues relevant to the Brecon Beacons National Park Local Development Plan	Proposed Policy Intervention
	for increased community vitality and quality of life by enabling placemaking through place-planning.
	Policy aimed at supporting community sustainability, Or permissive policies aimed at enabling development which would have a positive impact on community sustainability

Table 1: Policy Interventions

3. Empowering Communities

The NPA has been engaged in Place Plan development since the adoption of the first Local Development Plan in 2013. Our experience with this community-led planning work has provided impetus for the next iteration of the LDP to further capitalise on the strength of our communities. Accordingly in order to meet small scale community aspirations for local needs growth, LDP2 will provide opportunities to prepare and review Place Plans to identify and plan for new housing, employment land, renewable energy schemes and active travel.¹

1.3 Sustainability Appraisal and Habitats Regulations Assessment

The Preferred Strategy has been subject to Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) as per requirements of the LDP Regulations and EU Directive 2000/42/EC

Sustainability Appraisal incorporating Strategic Environmental Assessment. The evidence collected through the SA process demonstrates that the Preferred Strategy should balance the need to mitigate the effects of climate change and environmental impact against the need to provide opportunities for key social and economic growth whilst enabling opportunities for community vitality. All elements have been subject to detailed assessment through the drafting process, helping to refine the Preferred Strategy to better achieve sustainability objectives.

Habitats Regulation Assessment. The initial screening assessment is contained in Appendix F of the appended HRA. On the basis of objective information, likely significant effects of the preferred strategy cannot be ruled out on any of the European sites considered. The process is iterative and the deposit plan will need also need to be screened. If at that stage Likely Significant Effects cannot be ruled out, an appropriate assessment will need to be undertaken to determine whether the Deposit LDP, alone or in combination with other plans or projects, will have an adverse effect on the integrity of any of the European sites considered.

1.4 Risk

Publication of pre-deposit documents is a statutory obligation on the Authority. The timeline for publication has been agreed with the Welsh Government in the published Delivery Agreement (BBNPA 2018). Compliance with the Delivery Agreement is a Welsh Government Key Performance Indicator and any slippage from the timetable would reflect as the Authority

¹ It is acknowledged that Place Plan can include these elements as well as a range of actions for future action identified by the community. Please refer to the guidance produced by the NPA with the Design Commission for Wales: <https://www.beacons-npa.gov.uk/wp-content/uploads/Place-Plan-Toolkit-Shape-My-Brecon-Beacons.pdf>

failing in this area. The Authority has already faced a 4 week delay due to the need to revisit some of the economic forecast evidence (referred to as acceptable slippage)

Moreover, there is substantial risk arising from delay in the adoption of LDP2. The existing LDP runs until December 2022, after which it will no longer be considered to be the adopted development plan for the area. At present we are anticipating adoption of LDP2 in March 2022, obviously if this were to be delayed beyond December 2022 there is the potential for the area to be without an adopted development plan. The Authority would then be without the key framework document against which it could consider and determine planning applications.

1.5 Conclusion

It is considered that the suite of Pre-Deposit documents provide a robust response to National policy drivers and the challenges facing the future of the National Park.

Officers are seeking Member approval to publish the proposals for the purposes of public consultation and comment. Officers will consider all the comments received and the Preferred Strategy will be brought back to members for final approval at a later date. It will then form the framework for the development of the detailed proposals and policies of the pre-Deposit LDP2.

RECOMMENDATION(S):

It is recommended that Members:

- a) approve the Preferred Strategy for a period of 8 weeks public consultation**
- b) approve the publication of the following documents for observation**
 - 1. Initial Consultation Report**
 - 2. Initial Sustainability Appraisal Report**
 - 3. Habitats Regulations Assessment of the Preferred Strategy**