

A response from Campaign for National Parks to consultation on draft *Planning Policy Wales: Edition 10*

May 2018

1. Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation’s green treasures. We have been campaigning for over 80 years to ensure that our National Parks are beautiful, inspirational places that are relevant, valued and protected for all.
2. Campaign for National Parks brings together a wide variety of people and organisations to address issues affecting National Parks and take action to keep these beautiful places safe. We draw on a large pool of experts among our members, many of whom are actively involved in designated landscapes and their communities, across Wales and England and further afield. We also work closely with the Alliance for Welsh Designated Landscapes.
3. National Parks play a vital role in achieving the sustainable management of natural resources and contribute significantly to the well-being of the people of Wales. They are home to rural communities and also support the protection of the landscape, wildlife and key environmental resources and services, like water provision and carbon storage in peat soils and forests, which can mitigate the effects of climate change. As well as offering many opportunities for outdoor recreation, National Parks make a significant contribution to the economy through tourism, farming, and other related businesses. Many of these businesses rely on the high quality environment of these areas for their success.
4. Many of the benefits which National Parks provide, including tourism and rural economic growth, could be lost if the special qualities for which they are valued are undermined. National Parks are, of course, living and working landscapes but the challenge is to ensure that the range of benefits that protected landscapes provide is not compromised by insensitive change, unsympathetic land use or irresponsible development. It is therefore essential that national planning policy provides strong support for the protection and enhancement of these areas.
5. We welcome the opportunity to provide comments on the draft *Planning Policy Wales: edition 10* (PPW10). We have focused our comments on National Parks as that is our remit but many of the issues we have covered are equally relevant to Areas of Outstanding Natural Beauty (AONBs). We are happy for this response to be made public.

Response to specific consultation questions

Q1: 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.

6. We broadly welcome the intention of aligning PPW10 with the *Well-being of Future Generations Act 2015* and the *Environment Act 2016* as this helps make it clear that the planning system is central to achieving the aims of this legislation. We particularly welcome the changes of wording which make enhancing biodiversity and minimising environmental risk a duty of planners. However, we are concerned that the revised structure makes it

harder to find relevant policies on particular topics, for example, housing or employment as information on these is spread throughout the document rather than included in specific chapters as it was previously. Although paragraph 2.22 states that the document should be read as a whole, in practice PPW10 will need to be used as a reference document and organising it around topic-based chapters would make it more useful for this purpose.

7. The document appears to use 'local authority' and 'local planning authority' to mean the same thing. This could cause confusion as National Park Authorities (NPAs) are local planning authorities but not local authorities. References to 'local authorities' should be changed to 'local planning authorities' where this is what is intended, for example, in paragraph 2.84.

Q2. Do you agree the introduction provides an adequate overview of the planning system in Wales and appropriate context? If not, please explain why.

8. We would like the introduction to include a reference to the National Park Management Plan as local development plans are one of the key mechanisms for delivering the aims of the Management Plans. It would also be useful to include in the introduction specific reference to the role of National Park Authorities as planning authorities. The statutory purposes for National Parks and the duties relating to these, which apply to all public bodies, and are particularly relevant to local planning authorities making planning decisions on land adjacent to National Parks should also be included. All this is set out in the *Environment Act 1995* which is a key piece of legislation for National Parks. In addition, references to the Environment Act throughout the document should include a date to avoid any confusion between the *Environment Act 1995* and the *Environment Act 2016*.

Q3. Do you agree with the Planning Principles? If not, please explain why.

9. Yes, but the Welsh Government should ensure that the EU environmental principles are embedded in the planning principles in PPW10 and all other Welsh Government policy and guidance, given that it has already committed to retaining these. Paragraph 2.24 should explain the different approach that applies to planning decisions that affect National Parks and should include a reference to the Sandford Principle which the Welsh Government has now committed to retaining.

Q13. 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.

10. No, the provision of a range of site sizes is not necessarily possible or appropriate in the context of a National Park. It is essential that NPAs are able to adopt planning policies which ensure the most appropriate form of housing for their area in order to make it easier for local people to work and live in areas which might otherwise be unaffordable. We would not want national prescription about the types of housing that should be delivered to undermine this.

Q14. 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.

11. As set out above, we would not want national prescription to undermine NPAs ability to deliver the most appropriate housing for their area.

Q23. Do you agree with the changes to Telecommunications section of the draft PPW? If not, what other changes could be made to clarify the situation? If not, please explain why.

12. Campaign for National Parks supports the provision of improved mobile connectivity in rural areas but this must be achieved in a way that minimises the visual impacts of new telecommunications infrastructure. We welcome the stronger emphasis on the sharing of infrastructure and the reference to disguising masts as both of these will help reduce the visual impacts of infrastructure.

Q25. Do you agree with the new requirements for local renewable energy planning as set out in the draft PPW? If not, please explain why.

13. We believe that NPAs should be exempt from the requirement to include renewable energy targets in their local development plans. We recognise that National Parks have a key role to play in delivering the types of energy infrastructure that will be required to meet the UK's targets for carbon reduction and renewable energy supply. However, given the statutory purposes of National Parks, care needs to be taken to ensure that any energy infrastructure proposed is appropriate in scale and design for such a setting and does not damage the landscape, tranquillity and character of these protected areas. The statutory requirement to conserve and enhance the wildlife, natural beauty and cultural heritage of these areas is incompatible with having renewable energy targets.
14. Similarly, we think that NPAs should be exempt from the requirement for local planning authorities to identify spatial areas where renewable energy developments will be permitted. Renewable energy developments within National Parks should only go ahead if they are of an appropriate scale and should be located in such a way as to minimise their visual and environmental impacts. Particular care should also be taken over the cumulative impact on the landscape from a proliferation of small scale renewable energy schemes, in particular wind energy developments.
15. The need to avoid or mitigate adverse landscape and visual impacts should be added to the bullet point list in paragraph 4.143.

Q30. Do you agree with the approach taken to landscape, biodiversity and green infrastructure? If not, please explain why

16. We welcome the retention of the strong presumption against minerals development in National Parks and AONBs and support the fact that this policy has been strengthened slightly by the reference to 'very exceptional circumstances' in paragraph 4.224. However, we are concerned that there is an inconsistency between this policy which clearly states that only a UK need could be considered as a possible justification for minerals development in designated landscapes and paragraphs 4.196 and 4.213 which suggest that weight should also be given to regional need. These paragraphs need to be amended to make it clear that regional need is not a justification for minerals development in designated landscapes.
17. We have some concerns about the section which specifically refers to National Parks and AONBs, starting at paragraph 5.24. Much of this is adapted from the equivalent paragraphs in *Planning Policy Wales Edition 9* (PPW9) and we are pleased to see the retention of key principles such as the major development test and the fact these areas must be afforded the highest status of protection against inappropriate developments. However, some of the changes are confusing, particularly the removal of the reference to National Park Authorities and their role as planning authorities. This needs to be clarified and amended.

In addition, we would like the explanation of the Sandford Principle to be reinstated in the main text rather than moved to a footnote. This is an important and long-established part of the planning protection for National Parks and moving it to a footnote could give the impression that it is no longer so important. We would also like to see the reinstatement of the full wording in paragraphs 5.3.6 and 5.3.7 of PPW9 which clearly explain the role of planning in National Parks and sets out that the duty to have regard to National Park purposes also applies to all decisions which affect those areas.

Q32. Do you agree with the approach taken to air quality and soundscape? If not, please explain why.

18. We note and welcome the reference to dark skies.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager (email:ruthb@cnp.org.uk, tel: 020 7981 0896).