



By email to: planconsultations-d@gov.wales

Welsh Government Consultation on Targeted Policy Changes to Planning Policy Wales

A joint response from the Campaign for National Parks and the Alliance for Welsh Designated Landscapes (May 2023)

Campaign for National Parks is the independent national voice for the 13 National Parks in Wales and England. 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. We bring 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.

The **Alliance for Welsh Designated Landscapes** champions the stewardship of Wales’ designated landscapes. AFDL brings together the expertise of local and national organisations working as advocates for the protection and management needed for Areas of Outstanding Natural Beauty and National Parks to deliver their purposes and flourish.

We welcome the opportunity to respond to this consultation as effective planning policy plays an important role in delivering the statutory purposes in Designated Landscapes and ensuring that these areas are delivering for nature, people and climate. Our response focuses primarily on the proposed changes to paragraph 6.3.10 as this is the aspect of the consultation of specific relevance to Designated Landscapes. We have also included some brief comments on the other proposed changes.

Changes to paragraph 6.3.10

We strongly support the proposed changes to paragraph 6.3.10 which make it clearer that it is for the relevant local planning authority to determine what counts as ‘major’ development for the purposes of the major development test. The need for this change is supported by the recommendations from research on the major development test in the English and Welsh National Parks by Sheffield Hallam University¹ which identified the importance of National

¹ Campaign for National Parks, National Parks: Planning for the Future, 2016
([https://www.cnp.org.uk/sites/default/files/uploadsfiles/NationalParks_Planningforthefuture_LORES\(1\).pdf](https://www.cnp.org.uk/sites/default/files/uploadsfiles/NationalParks_Planningforthefuture_LORES(1).pdf))

Park Authorities (NPAs) being able to apply the major development test in a way which is appropriate to their local context.

We welcome the proposed change to paragraph 6.3.10 as it is important to avoid use of definitions of 'major' development, or development of national significance intended for other purposes when considering whether the major development test should be applied. For example, Planning Policy Wales defines major residential development as 10 or more units or covering an area of 0.5 hectares or more of land but developments just under this threshold could have a major impact in some parts of some National Parks or AONBs.

The Sheffield Hallam research also highlighted the benefits of NPAs having clear policies on how the major development test should be applied locally and identified a number of good practice examples where NPAs are clear about defining development as 'major' in terms of its impacts on the special qualities of the National Parks. We believe that this as an approach that should be adopted by all relevant local planning authorities as it provides greater certainty for developers and helps to reinforce support and understanding among decision-makers.

We would, therefore, like to suggest an additional change which could be made to paragraph 6.3.10 in order to further reinforce the message that decisions on what constitutes 'major' development should be taken at the local level. This could be achieved by adding words along the lines of "deciding whether a development should be treated as major in the context of the major development test is a matter for the relevant decision taker, taking into account the proposal in question and the local context".

Other changes to PPW

We welcome the other proposed changes proposed to PPW as we believe they will help strengthen the role of the planning system in supporting nature recovery and the resilience of ecosystems. We particularly welcome the additions which highlight the need to consider the impacts on biodiversity of all development and emphasise the importance of avoiding biodiversity loss as far as possible including the additional more detailed approach to maintaining and enhancing biodiversity set out in paragraph 6.4.21 which makes it clear that offsite compensation should only be used as a last resort. We also strongly welcome the new paragraph setting out a presumption against development on peat soils; the changes and additions to the text in paragraphs 6.4.24-6.4.27 which strengthen the policy on retaining existing trees, woodland and hedgerows and set minimum standards for the replacement of any trees lost to development; the new text on nature-based solutions and the role of the planning system in improving water quality in section 6.6; and the presumption against minerals development in SSSIs and other sites protected for nature included in the amendment to paragraph 5.14.37.

For further information about any aspect of this response, please contact Ruth Bradshaw, Policy and Research Manager, Campaign for National Parks (email:ruthb@cnp.org.uk) or Julian Pitt, Cynghair dros Dirluniau Dynodedig Cymru, Alliance for Welsh Designated Landscapes (email: djulianpitt@gmail.com)