Parciau Cenedlaethol Cymru
Tystiolaeth i'r Comisiwn ar Lywodraethu a Darparu Gwasanaethau Cyhoeddus

National Parks Wales
Evidence to the Commission on Public Service Governance and Delivery

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1.0   Introduction

1.1   National Parks Wales welcomes the opportunity to respond to the Commission on Public Service Governance and Delivery. In this submission we explain the origin, role and benefits of National Parks and the special purpose bodies that manage them (the National Park Authorities). We have addressed each of the six key inter-related areas of focus identified within the Call for Evidence and would be pleased to provide more details on any of the enclosed.

1.2   National Parks were created to protect the most beautiful and imposing landscapes in the UK and to facilitate their enjoyment by the public. Following a long campaign by people for greater access to the countryside, National Parks were set up as part of the national post-war reconstruction that took place in the 1950s. They were created alongside other major public services such as the National Health Service. Unlike some of their international counterparts, they are not wilderness areas and are formed by and valued because of the interaction between people and the landscape.

1.3   There are three National Parks in Wales covering an area of 4,122 sq. km, which represents approximately 20% of the land area of Wales. Snowdonia was designated in 1951, the Pembrokeshire Coast in 1952 and the Brecon Beacons in 1957.

1.4   Each National Park is managed by a National Park Authority (NPA). The three Welsh NPAs work in partnership as National Parks Wales, which provides NPAs with the means of identifying issues of joint interest and agreeing outputs. Information and experiences are shared between NPAs.

Value of National Parks

1.5   Wales' National Parks are internationally recognised and are of huge value to Wales environmentally, socially and economically. They are part of a worldwide movement of international significance and the NPAs help to put Wales on the international map through their international links. The NPAs participate in a number of skill sharing and knowledge transfer programmes with their international counterparts e.g. Snowdonia NPA has trained Norwegian Park Rangers on footpath restoration. Best practice is also shared through the Europarc Federation[1] and twinning arrangements, as well as bilateral agreements e.g. the UK National Parks Association has signed a memorandum of understanding with the China Association of National Parks[2].

1.6   The NPAs help to promote Wales through securing and promoting projects of international significance, such as Wales' first international dark sky reserve, a status awarded to the Brecon Beacons[3]. This generated worldwide publicity which has increased interest in the area and spurned a new interest in 'astro-tourism' in the Brecon Beacons. Local hotels and B&Bs appeal to astro-tourists by offering star maps and telescopes, and have learned more about the night sky through the Brecon Beacons NPA's Dark Sky Ambassador course.

1.7   There are many other examples of where National Parks have helped Wales to achieve international recognition. For example, in 2010 the Pembrokeshire Coast was voted

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[1] http://www.europarc.org/home/
[2] http://www.nnpa.org.uk/parklive/news/news-pages/chinese-delegation-visits-northumberland-national-park
[3] http://www.bbc.co.uk/news/uk-wales-21496562

the second best coastline in the World (and the best in Europe) for sustainable tourism management[4].

1.8   A soon to be published report by ARUP has found that the three National Parks are a significant part of the Welsh economy (annex 1).

1.9   Overall, the National Park economies account for £557 million Gross Value Added with their environments directly supporting 10,738 jobs within their boundaries and a further 2,033 jobs across Wales. The Parks receive 12 million visitors per annum who spend an estimated £1 billion on goods and services each year.

1.10   The value of National Parks has increased since devolution – four new National Parks have been introduced in England and Scotland with strong public support (the New Forest, South Downs, Cairngorms and Loch Lomond and the Trossachs). National Parks are 'well-being factories' contributing a wide range of health and social benefits in an increasingly complex and pressurised world.

Remit of National Park Authorities

1.11   NPAs have a legal basis and are charged with the achievement of National Park statutory purposes[5] which are: conserving and enhancing the area's natural beauty, wildlife and cultural heritage, and promoting opportunities for the understanding and enjoyment of its special qualities by the public. They have a duty, in pursuing their statutory purposes, to seek to foster the economic and social well-being of local communities within their National Park, in co-operation with local authorities and bodies whose functions include the promotion of economic or social development.

The importance of independence

1.12   When the National Parks were first established they were managed through committees of County Councils. In the early 1990s, an independent panel chaired by Cardiff University Professor Ron Edwards reviewed the history and operation of the Parks over the past 40 years and set out a vision for their future, culminating in a report known as the Edwards report[6]. **One of the review's principal recommendations was for the creation of free-standing, independent National Park Authorities as local government management was not delivering National Park purposes effectively.**

1.13   The review concluded that:

"Independence would allow the National Park Authority to set its own agenda and pursue it resolutely… Despite evidence of some increasing flexibility by county councils over the devolution of responsibilities, national parks need authorities with complete freedom to manage finance, personnel and property resources and to organise their own administrative procedures, including the commissioning of professional services."

1.14   The principle of and rationale for free-standing, independent authorities was accepted by the Government, which agreed that a county council, with its wider remit, would not be able to give the same focus and resources to a National Park that an NPA would.

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[4] National Geographic Magazine poll of 340 travel journalists
[5] s5(1) of the 1949 National Parks and Access to the Countryside Act, updated by the 1995 Environment Act
[6] Report of the National Parks Review Panel, the Countryside Commission (1991)

1.15   It was recognised at the time that: "Those authorities will help to ensure that the parks are properly financed and that the local people who live in them will have an effective voice in their running….. a major benefit of an improved administrative framework for each park will be that the authorities will be able to spend less time on bureaucracy and more time on working closely with all their partners."[7]

1.16   Provision was subsequently made for the establishment of free-standing, independent authorities through the Environment Act 1995. This received cross-party support in both Houses of Parliament.

1.17   The NPAs in Wales were set up in 1996. Initially, Welsh Office Circular 13/99 provided strategic guidance to them on the practical implementation of their core functions. In 2004, the Welsh Government published the results of an independent review of the National Parks. In 2007, the Welsh Government produced a policy statement on National Parks and NPAs[8] and is currently consulting on a replacement policy statement[9].

1.18   Each of these reviews and statements has reaffirmed the importance and benefits of Wales' National Parks, their significance to a modern day Wales and the continuing importance of independent NPAs to manage National Parks.

Added value

1.19   NPAs have substantial additional expertise available to them compared to the dwindling specialist services of local authorities. The most obvious manifestation of this is their staff. This includes rangers, estates workers, farm advisers, ecologists, woodland advisers, Public Rights of Way officers, access advisers and tourism and recreation specialists. In addition, the NPAs have a large, active and highly motivated volunteer reserve to call upon to support the delivery of their purposes e.g. in the Brecon Beacons in 2012, 147 volunteers provided 10,000 hours of volunteer time, worth almost £110,000.

1.20   There is no duplication with local government; almost all of the functions are different. **Transfer of NPA functions to local government would in effect recreate a model that has previously been tried and failed in terms of delivering National Park purposes.**

1.21   The structure of local government is markedly different from that in 1996 with Cabinet-style Councils now the norm. An advisory committee on National Parks within a Council would be even less effective than when it was considered and rejected by the Edwards Review.

1.22   As far as we are aware the views of some local authority leaders that NPA functions should be delivered by their respective councils are not formal corporate positions of their authorities. There is no evidence to suggest that this would offer better value for public money, or that National Park purposes would be delivered more effectively by local authorities, who have a much wider remit and are themselves facing a sustained period of change and significantly reducing resources. We note that the WLGA has made no comments on NPA functions in its response to the Commission.

1.23   Two communities within Snowdonia (represented by Llanberis Community Council and Ffestiniog Town Council) have made a formal request to be included within the National

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[7] Hansard, 16 March 1994, Col. 326
[8] Policy Statement for National Parks and National Park Authorities, Welsh Government (March, 2007)
http://wales.gov.uk/about/cabinet/cabinetstatements/2007/1321477/?lang=en
[9] Consultation on the draft Policy Statement for Protected Landscapes in Wales, Welsh Government (June 2013)
http://wales.gov.uk/consultations/cultureandsport/landscape/?lang=en

Park because of the benefits that they perceive this would bring for their communities and the competitive advantage provided by the National Park brand (annexes 2 and 3).

2.0   Performance

2.1   This section considers the performance of NPAs on some of its key functions, including development planning and management (which yields the most statistics due to its statutory nature). The processes for monitoring the corporate performance of NPAs are explained in Sections 5 and 7. While the Welsh NPAs compare very favourably and in many instances outperform local authorities, precise performance comparisons with the English and Scottish NPAs are difficult to make due to different data reporting and monitoring requirements. Broadly, performance in key areas such as planning, education, rights of way management and building conservation is comparable with NPAs in England.

Access and Public Rights of Way

2.2   NPAs have a long history of innovative working and pioneering new approaches to access management, which have been later adopted as standard practice by local authorities. The excellent performance of the NPAs in the management of countryside access and recreation was recognised by the Wales Audit Office in 2006[10], with examples of best practice in partnership working with landowners and the private sector, environmental education, promotion of access opportunities via the internet and the integration of public transport with countryside access provision.

2.3   In recognition of the primacy of public rights of way in the delivery of their second statutory purpose, the NPAs have taken a proactive approach to the management of public rights of way. Brecon Beacons and Pembrokeshire Coast NPAs have formal delegation agreements with their host local authorities, transferring the statutory responsibility for the maintenance of public rights of way to the NPAs. Snowdonia NPA has a service level agreement with one of its local authorities.

2.4   The proportion of public rights of way that are classed as easy to use in the National Parks is well above the Wales average (public rights of way currently easy to use are 76% in the Brecon Beacons and 78% in the Pembrokeshire Coast; the performance indicator for Wales is 55%[11]).

2.5   NPAs' rich experience in the management of public rights of way has enabled them to inform national guidance such as the CCW publications 'By All Reasonable Means: Inclusive Access to the Outdoors for Disabled People' and 'Managing Public Access'.

2.6   NPAs have also advised on the introduction of new legislation such as the Countryside and Rights of Way Act 2000 and piloted the establishment of Local Access Forums and the preparation of Rights Of Way Improvement Plans to assist in the development of regulations and statutory guidance on the implementation of these new duties.

Building Conservation

2.7   Each of the three NPAs proactively undertakes a programme of building conservation work, often in partnership with CADW[12], which benefits townscapes and the local economy The three NPAs also run historic building grant schemes to improve and protect historic buildings including Buildings at Risk e.g. Snowdonia currently has a budget of £130,000

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[10] Public Access to the Countryside, Wales Audit Office (2006)
[11] Wales Government Data Unit
[12] The Welsh Government's Historic Environment Service http://cadw.wales.gov.uk/?lang=en

targeted at removing 3% of the total buildings at risk on the Register annually, the equivalent of 9 buildings.

Education

2.8   NPAs provide a range of education services, which are complementary to the services provided by local education authorities. These include study centres, work with schools and dedicated events.

2.9   The Snowdonia NPA's Environmental Study Centre Plas Tan y Bwlch provides professional courses as well as school and college courses on all types of environmental issues, which enhances people's understanding of the National Park. Every year an average of 25 schools (around 1,200 children) attend day courses and a further 22 schools (around 1,000 children) have residential stays. The NPA also runs educational 'road shows', promoting learning on biodiversity to local schools.

2.10   In the Pembrokeshire Coast over 10,000 pupils attended education events at Carew Castle and Castell Henllys and field-based events led by NPA rangers. Over 2,700 'hard to reach' people took part in organised events through the 'Your Park' and 'Walkability' schemes.

2.11   The Brecon Beacons NPA supports the Government in its Eco-Schools initiative which encourages pupils to engage with issues related to environment and sustainability. Students become key contributors to decisions about reducing the environmental impact of their school. The NPA also supports the Healthy Schools initiative and has worked in partnership with Communities 1st Ystradgynlais to develop playground toy chests which help children to enjoy the outdoors.

Conservation

2.12   NPAs have a good track record on delivering conservation objectives including on challenging issues such as restoring Blanket Bog and tackling invasive species such as Rhododendron. In 2012, Snowdonia NPA secured funding from the Ecosystems Resilience and Diversity Fund to run a £35,000 scheme to restore 38ha of blanket bog which includes opportunities for volunteering and educational work for local schools. The scheme is now considered an exemplar project and has been highly commended for its design, operation and outputs.

2.13   The Woollenline[13] project at Pen Trumau in the Black Mountains in the Brecon Beacons National Park uses a highly innovative approach to restore damaged peat bog. Llangynidr-based artist Pip Woolf runs the artistic project which uses lines of wool to protect peat from erosion, and joins local communities together in the process.

2.14   Snowdonia NPA has taken a lead on Rhododendron control over many years. The eradication scheme is worth £800,000 and is administered fully by the NPA due to its specialist knowledge in this area and non-bureaucratic approach to tenders. Contracts for eradication work are awarded locally and provide 30 jobs within the National Park.

Social inclusion

2.15   The Mosaic project currently works with black and minority ethnic communities with the aim of introducing new people to National Parks. This is a partnership project between

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[13] http://www.beacons-npa.gov.uk/the-authority/communications-and-media/press-releases/may-2013/innovative-brecon-beacons-project-wins-a32-000-park-protector-award

the Campaign for National Parks, National Park Authorities, National Park Societies and the YHA.

2.16   Mosaic project officers operate in each of the three National Parks, recruit community champions, organise visits and activities and introduce new people to the Parks. This project contributes to the NPAs' shared aim to make sure that everyone has an equal opportunity to experience National Parks and to share in the health, cultural, educational and environmental benefits that they offer.

Planning

2.17   The role of the planning system to regulate the use of land in the public interest is a challenging one and is at its most challenging in sensitive landscapes such as National Parks. In 2011 an evaluation[14] of planning services in statutory designated landscapes in Wales was undertaken by Land Use Consultants for the Welsh Government (annex 4). This found that member training is done very well in the three Welsh NPAs with regular and joint training sessions and pre-application discussions encouraged and found to be useful.

2.18   The evaluation supported integration with constituent local authorities and collaboration on service delivery and found that all three NPAs have entered into formal arrangements to share resources/expertise e.g. Pembrokeshire Coast NPA and Brecon Beacons NPA share a minerals planning applications officer with Carmarthenshire County Council and Brecon Beacons NPA has in recent years jointly funded an affordable housing officer with Powys County Council. Similar arrangements exist in Snowdonia. Significantly, the evaluation concluded that:

> **…the key advantage of planning to National Park boundaries is that NPAs can adopt a consistent approach across the whole of the National Park area in their Local Development Plan regardless of local authority boundaries. This allows clear focus to be given to National Park purposes and allows alignment with the National Park Management Plan, creating a coherent approach and a clear focus across each National Park. (para 4.6).**

> …there is recognition of the importance of statutory designated landscapes having their own clear identity, separate from that of the constituent local authority(s), to try and ensure consistency in the delivery of planning functions across the statutory landscape. (para 4.18)

2.19   The evaluation found many examples of good practice within NPAs, as well as good performance in relation to national indicators for planning service delivery. **At the local level, each National Park local development plan was found to provide a consistent policy context for planning to the boundary of the statutory designated landscape, in line with National Park purposes (this should be contrasted with the weak and inconsistent position the evaluation found in AONBs in which the planning system is managed by the constituent local authorities).**

2.20   Without an NPA planning function there would be an inconsistent approach to the management of development due to the large number of local authorities involved (e.g. there are nine unitary authorities in the Brecon Beacons National Park) and the resulting lack of coherence between management and development planning. This would undermine the delivery of National Park purposes. The importance of planning in supporting biodiversity in National Parks has been recognised by the Minister in his strategic grant letter for 2013-14 (annex 5).

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[14] Delivery of Planning Services in Statutory Designated Landscapes in Wales, prepared for Planning Division of the Welsh Government by LUC, (August 2012)

2.21   All three Welsh NPAs have made excellent progress on local development plans[15]. Pembrokeshire Coast NPA was the first local authority in Wales to succeed in getting its plan adopted, Snowdonia NPA achieved adoption in 2011 (and was the first in North Wales to adopt) and Brecon Beacons NPA will achieve adoption later in 2013. This means that the NPAs are outperforming several other local authorities (including Gwynedd, Powys, Monmouthshire and Carmarthenshire) and that communities and businesses within National Parks have a more certain and up to date policy framework to guide their needs and aspirations than their neighbours. This proactive approach to plan development has resulted in NPAs pioneering new policy approaches in Wales e.g. the Pembrokeshire Coast NPA was one of the first authorities in Wales to introduce commuted payments on single dwelling proposals to support affordable housing.

2.22   On development management, the three NPAs perform as well as other rural local authorities. The NPAs have a good track-record in operating a responsive planning service e.g. in the Pembrokeshire Coast 89% of Planning Enforcement cases are resolved within 12 weeks.

2.23   The most recent planning statistics[16] from the Welsh Government on speed of determining planning applications is included in annex 6. This shows that the NPAs' average speed of determination (about 67%) is on a par with that of the 9 rural local planning authorities (about 68%).

2.24   NPAs undertake regular surveys of users as part of service monitoring and improvement. In the Brecon Beacons planning customers' overall satisfaction ratings[17] with the service received have increased from 76% in 2010-11, to 88% in 2011-12 to 91% in 2012-13. In Snowdonia, overall satisfaction with the planning service was rated 93% by planning applicants in 2012-13, with satisfaction rates for advice received by planning officers at 97%. In the Pembrokeshire Coast, the overall satisfaction with the service in 2012/13 was 85%. Each NPA has a planning service improvement plan which is regularly monitored and updated.

2.25   It can be seen therefore that National Park status and NPAs' role as planning authorities are not a bar to positive planning or good performance, as is perceived by some. Further evidence of this includes the recent establishment of two enterprise zones within National Parks – Haven Waterway in the Pembrokeshire Coast and former development sites at Trawsfynydd and Llanbedr in Snowdonia[18]. Major developments can and do take place within National Parks e.g. the South Hook LNG plant in the Pembrokeshire Coast[19].

Affordable housing

2.26   NPAs address the challenge of the shortage of affordable housing in partnership with local housing authorities and housing associations e.g. by supporting the work of Rural Housing Enablers who work on behalf of local communities to carry out housing need surveys and come up with tailor-made solutions to meet identified local housing need.

2.27   The Rural Housing Enabler Projects have been successful in bringing together housing and planning professionals. The initiatives have produced concrete results in providing small scale, low cost affordable housing with improved communication between the

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[15] http://wales.gov.uk/docs/desh/policy/130426development-plan-progress-en.pdf
[16] http://wales.gov.uk/topics/planning/planningstats/development-control-quarterly-survey/january-to-march-2013/?lang=en
[17] Customers who viewed the service as fair and above
[18] http://enterprisezones.wales.gov.uk/enterprise-zone-locations/ebbw-vale/communications
[19] http://www.southhooklng.co.uk/

essential players. This approach resulted in the following outcomes in Snowdonia in 2012-13:

Residential Completions	%
Open market	28.1
Affordable	64.9
Agri Workers Dwelling	7.0

Residential Planning Permissions	%
Open market	35.7
Affordable	54.8
Rural Enterprise Dwelling	9.5

Renewable energy

2.28   NPAs have adopted a positive approach to renewable energy developments, as can be seen from annex 7. Between April 2007 and March 2011 on average 85.8% of applications were approved.

Case for new powers

2.29   Rather than emasculating NPA powers or functions, we believe that there may be merit in extending the range of powers available to NPAs which would facilitate the delivery of a more complete public service and greater join-up on delivery. There are a number of areas that could be looked at:

- **Rights of way management** – the public rights of way system is an essential tool for delivering the second statutory purpose of NPAs to promote opportunities for the understanding and enjoyment of the Park's special qualities by the public. Local authorities are legally responsible for public rights of way and although some delegate some of their management responsibility to NPAs, this is not done consistently across Wales and is insufficiently resourced;

- **Building regulations** – creating a single service area where NPAs are responsible for both development management and building regulations would provide a more user-friendly service for communities and businesses wishing to undertake works that fell within both regimes;

- **Management of National Nature Reserves** – Natural Resources Wales is undergoing a period of transition and transformation[20]. This presents opportunities for discussion on new forms of partnership working and possible transfer of management responsibility e.g. the partnership management and promotion of Cwm Idwal National Nature Reserve[21] by Snowdonia NPA, Natural Resources Wales and the National Trust could offer valuable lessons for other areas;

- **Destination Management Partnerships** – NPAs already play a strong leadership role within and in developing these partnerships[22], often because of a lack of local authority focus. This leadership role could be further developed in the future. Much of what NPAs deliver can be regarded as contributions to the local economy through tourism – path work, information provision, interpretation, traffic management, development management etc. Recognition of this leadership role of NPAs by Visit Wales would be helpful in enabling NPAs to develop their leadership ambitions and to deliver cohesive and sustainable destination management and development;

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[20] Natural Resources Wales 2013-14 Business Plan http://naturalresourceswales.gov.uk/content/docs/pdfs/our-work/about-us/business-plan-2013-2014-E.pdf?lang=en
[21] http://www.ccw.gov.uk/landscape--wildlife/protecting-our-landscape/special-landscapes--sites/protected-landscape/national-nature-reserves/cwm-idwal.aspx?lang=en
[22] http://www.dmwales.com/content/create-destination-partnership

- **Sustainable Development** – the NPAs are seen as leading lights on sustainable development and as key authorities to take forward the Future Generations Bill. The Welsh Government regards the National Parks as exemplars and pioneers of sustainable development[23] and the NPAs operate successful Sustainable Development Funds. Highlighting the importance of their sustainable development role within the new Policy Statement will assist NPAs in their work to embed sustainable development as their central organising principle.

3.0   Scale and capability

3.1   The relatively small scale nature of NPAs has several distinct advantages for service delivery:

- **Reduces the potential for bureaucracy and enhances delivery capability and service quality** – as evidenced by the NPAs' performance on the adoption of Local Development Plans (see Section 2);

- **Promotes accessibility and responsiveness of decision makers** – anecdotal evidence from the Brecon Beacons NPA is that community council representatives greatly value their relationship with senior NPA representatives. In 2012/13 28 of the 52 Town and Community Councils within the Brecon Beacons National Park actively participated in the Community Council Charter developed by the NPA and 17 Councils were direct signatories to the Charter;

- **Provides a close interface with farmers and landowners** – NPAs work with hundreds of landowners to help them to make the most of the wildlife, heritage and access opportunities that they have on their farms through the provision of advice, practical assistance, capital grants and management payments;

- **Relies on partnership working, delivering more collective value for National Park purposes and communities** e.g. the Brecon Beacons NPA has worked with a number of public and private sector partners to achieve the European Charter for Sustainable Tourism in Protected Areas and the revalidation of Fforest Fawr Geopark – Wales' first Geopark. The positive impact of this collaborative work has been commended by the Welsh Government Minister responsible for National Parks[24]. The Wales Activity Tourism Organisation (WATO)[25] is a good example of Visit Wales funding across all three Parks for outdoor activity management, with the aim of sharing best practice across the outdoor sector in Wales. The Outdoor Charter[26] was piloted by Pembrokeshire Coast NPA and has been adopted by Brecon Beacons and Snowdonia NPAs;

- **Collaboration becomes the norm** achieving significant savings for the public purse. **During 2011-12 the NPAs of Wales saved an estimated £2.2 million through collaborative working.**

3.2   Generally, partnership working in the environment sector works well. There are a significant number of active partnerships and collaborations led by and involving NPAs e.g. the Brecon Beacons NPA and Powys County Council have agreed to work together on

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[23] Strategic Grant letter from the Minister for Culture and Sport to the Chairs of the 3 NPAs; consultation draft policy statement on Protected Landscapes
[24] http://www.beacons-npa.gov.uk/the-authority/communications-and-media/press-releases/march-2013/minister-praises-partnership-working-with-the-private-sector-in-the-national-park
[25] http://www.wato.org.uk/
[26] http://www.pembrokeshirecoastalforum.org.uk/projects/pembrokeshire-outdoor-charter/

conservation of historic centres such as Brecon and Talgarth and the provision of affordable housing; Pembrokeshire Coast NPA is collaborating with Pembrokeshire County Council, the Environment Agency and Pembrokeshire Biodiversity Partnership on the conservation, sympathetic management and restoration of grassland and meadows.

3.3   However, collaboration is about much more than delivering resource efficiency. It is a crucial way of recruiting public and private finance to the delivery of National Park purposes and often provides the necessary stimulus for projects that would otherwise be unlikely to happen. **Several developments of national significance would not have happened without the drive and commitment of NPAs and their collaborative efforts** e.g. in Snowdonia:

- Hafod Eryri[27] – Snowdon Summit – without the dedication and commitment of the Authority the old building would still be there. The NPA masterminded the complex (£8.5 million) engineering operation that removed the old building and replaced it with the unique, low impact Hafod Eryri, a project that renewed visitor interest in the mountain and made a direct contribution to the local visitor economy. Its partners included the Snowdon Mountain Railway Company and the Snowdonia Society;

- Yr Ysgwrn[28] – the home of Hedd Wyn a Welsh Language Poet who was killed during World War 1 and posthumously awarded the bard's chair at the 1917 National Eisteddfod. Born Ellis Humphrey Evans, he had been awarded several chairs for his poetry, was inspired to take the bardic name Hedd Wyn. The Farmhouse, land and bardic chairs were all saved for the nation by Snowdonia NPA because of the close relationship built up over the years with the local community. Without the NPA's leadership there is no doubt that the collection would have been sold and dispersed. Its partners included the Welsh Government, National Heritage Memorial Fund and the National Museum of Wales.

3.4   It is accepted that there is scope for greater collaboration between the three NPAs on the delivery of corporate services, which could deliver further resource efficiencies. This process has already started – e.g. Brecon Beacons NPA provides some of Pembrokeshire Coast NPA's legal services.

3.5   Greater efficiency in delivering corporate services would allow the NPAs to retain a strong focus on the local delivery of core, front-line services. These cannot be pursued remotely as they require intimate local knowledge of landscape and culture, and working with local partners, local communities and local landowners/managers. The review of NPA governance that will be undertaken by the Welsh Government in 2014 offers an opportunity to review and take forward the progress already made on alternative models for delivering corporate services and support functions.

4.0   Complexity

4.1   Public service delivery on natural resource management is complex, not least because ecosystems, habitats and catchments are complex entities; this is one of the reasons why Natural Resources Wales was established by the Welsh Government as a one-stop shop to deliver a more coherent environmental regulatory framework[29]. NPAs provide a complementary service to this by acting as one-stop shops within defined geographical areas, providing expertise, consistent service delivery and connections with communities.

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[27] http://www.eryri-npa.gov.uk/visiting/hafod-eryri
[28] http://www.eryri-npa.gov.uk/a-sense-of-place/yr-ysgwrn
[29] http://wales.gov.uk/about/cabinet/cabinetstatements/2013/naturalresourceswales/?lang=en

4.2	NPAs apply their resources and expertise to manage the land within their areas in an integrated way. The integrated stewardship from the co-ordinated skills, expertise and resources available from the NPAs enables a landscape-led and joined-up approach to the stewardship of the countryside. In this integrated approach to the management of the National Parks, each action taken or encouraged by the NPA is designed to deliver several relevant objectives at the same time and to have multiple benefits for National Park purposes so that maximum value for money is derived from the resources employed.

4.3	One of the main tools for achieving this joined-up approach is the National Park Management Plan[30], which sets out the objectives for the area and guides practical measures for achieving the objectives on the ground. It is a plan for the National Park as a whole and all those who manage it, not solely the NPA, and it is prepared and delivered in partnership with a wide range of bodies. The future of the Park and the state of its natural resources depends on sustained partnerships, particularly in times of limited public finance. NPAs play a pivotal role in facilitating and leading these partnerships.

4.4	The joined-up, integrated approach of NPAs is a good model for dealing with complex issues e.g. Brecon Beacons NPA was instrumental in establishing the Llangorse Lake Advisory Group, which comprises a diverse number of groups. Success in tackling what seemed like an intractable problem required vision and sustained engagement with partners. This has achieved wins for the whole ecosystem as well as riparian habitats, local businesses and Park users.

4.5	National Parks are associated with a strong sense of place, 'bro' or 'locale'. NPAs are active in protecting and promoting the rich cultural heritage of their areas e.g. through Bwrlwm Eryri[31], an innovative cultural heritage venture established by Snowdonia NPA. The functional coherence of NPAs operating to National Park boundaries is well established (see section 2) and the importance of sense of place is recognised by Natural Resources Wales[32].

4.6	There are three principal areas where the NPAs consider that further improvements can be made to reduce the complexity of working arrangements which would improve service delivery.

- **Looking at protected landscapes as a system** – this approach is encouraged by international guidelines on protected area management[33] and would entail greater collaboration with Wales' five AONBs. The draft Policy Statement on Protected Landscapes issued for consultation by the Welsh Government[34] provides a framework to allow productive discussion to take place on how this might be achieved in practice, including through a single management plan for all protected landscapes in Wales. Consideration should be given to how such a plan could be integrated with the plans and activities of Natural Resources Wales and how local distinctiveness would be respected. Closer working approaches and the sharing of expertise and good practices between National Parks and AONBs in Wales would be welcome

- **More productive collaborations with local authorities** – while there are many good examples of successful partnership working this can be undermined by political sniping about powers and control of NPAs. The NPAs would welcome a strong steer from the Commission that the state of public finances and the urgent need to address cross-cutting issues such as climate change require co-operation not conflict

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[30] e.g. http://www.beacons-npa.gov.uk/the-authority/planning/strategy-and-policy/npmp/2010-2015-national-park-management-plan
[31] http://www.eryri-npa.gov.uk/a-sense-of-place
[32] Landmap Guidance Note 4, Landmap and the Cultural Landscape, Natural Resources Wales (May 2013)
[33] http://data.iucn.org/dbtw-wpd/edocs/paps-016.pdf
[34] http://wales.gov.uk/consultations/cultureandsport/landscape/?lang=en

- **Renewed clarity within the new Policy Statement** that NPAs should be at the forefront of action on climate change, integrated land management and support for upland land management, with sufficient resource provided to enable this to happen

5.0   Governance, Delivery and Scrutiny

5.1   NPAs are unique as they are accountable through both the Local Government Measure[35] and the requirements of Assembly Sponsored Public Bodies and are subject to a high degree of regulation. The model of managing National Parks in the UK is recognised internationally as one that respects and engages the interests of local communities in relation to conservation[36]. While the governance of National Parks differs slightly across the UK it always involves both national and local interests. See annexes 8 and 8A for more details.

Nation	NPA composition	Direct elections
England	Approx. 2/3 local, including parish councillors; 1/3 national	No, but Defra committed subject to resources & demand[37] & pilots in the New Forest & Peak District
Wales	Approx. 2/3 local, 1/3 national	No – last considered in 2006 and not taken up
Scotland	Approx. 2/3 local, 1/3 national	Yes, a proportion of members are directly elected locally

5.2   Successive governments and NPAs have grappled with governance issues for many years. There is no easy solution to managing the tensions that inevitably arise between the pursuit of national objectives and local needs and accountability. The current model of involving both national and local interests, managed by an independent NPA, has struck an appropriate balance between managing these tensions and delivering outcomes of benefit to the whole of Wales. Moving functions back to local government would risk undermining this balance and the coherence and market identity that these areas have acquired over time.

5.3   While traditional models of accountability have involved elected members, modern interpretations offer a range of accountability options for public bodies, including the model of NPAs and that operated by the Local Health Boards.

5.4   NPAs are recognised as exemplars of good governance in local government e.g. all three NPAs have achieved the charter for member development and the Brecon Beacons NPA is one of only two authorities in Wales to have achieved the advanced charter for member development[38]. The Brecon Beacons NPA was one of the first Authorities in Wales to begin webcasting its main committee meetings as part of its commitment to transparency. All three NPAs have held the Investors in People Standard for a number of years.

5.5   NPAs employ a range of techniques to involve people in decisions on service delivery and performance e.g. the Brecon Beacons NPA has worked with Planning Aid Wales[39] to engage communities in the Local Development Plan process (this has been promoted by Planning Aid Wales as best practice on community engagement).

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[35] Local Government (Wales) Measure 2011 http://www.legislation.gov.uk/mwa/2011/4/part/6
[36] The Welsh National Parks are classified by the IUCN as Category V Protected Landscapes, a status defined by a balanced interaction between people and nature. This has recently been reviewed and re-assigned
[37] Defra update (April 2013) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192247/PB13908-review-of-national-park-governance.pdf
[38] http://www.wlga.gov.uk/member-development-charter
[39] http://www.planningaidwales.org.uk/how-paw-can-help/training/case-studies

5.6   Fundamental change to the governance model would therefore, in our view, be a retrograde step that would undermine Wales' credibility on protected landscape management. However, while we believe that the current model of National Park governance is the best for Wales, we recognise that it could be modified in the context set by the Commission and are committed to looking at ways in which this might be done so that our governance arrangements remain fit for purpose.

5.7   The Minister for Culture and Sport has signalled his intention[40] to review the governance arrangements for National Parks once the Commission for Public Service Governance and Delivery has delivered its report. This review will include reflection on the nature of accountability to Welsh Ministers and the administration of the authorities.

5.8   The three NPAs in Wales have a number of active work programmes looking at opportunities for collaboration and the pursuit of shared outcomes e.g. the NPAs have commissioned a study into the joint working opportunities for our planning departments (annex 9). We are also monitoring working arrangements in other parts of the UK such as Scotland, where good progress has been made on collaboration between the two NPAs, including establishing single support platforms where justified by a common need.

5.9   The members of the three Welsh NPAs come together annually at the Welsh members' seminar to learn and share experiences, as well as with member colleagues from the English and Scottish NPAs at an annual seminar for members of all the UK's NPAs. UK National Parks also arranges an annual induction course for new members.

5.10   We will use these studies and learning outcomes to inform the review of governance arrangements that the Welsh Government will be undertaking in 2014.

5.11   Welsh Government scrutiny arrangements of the NPAs are summarised in Section 7 of this submission. The NPAs are also subject to scrutiny by the Wales Audit Office as part of the Wales Programme for Improvement. All three NPAs have received positive improvement letters in April 2013[41] with no statutory recommendations.

6.0   Culture and Leadership

6.1   The culture within the three Welsh NPAs is characterised by the following key principles:

- **Recognition of the needs of beneficiaries within service delivery** e.g. in 2012 Pembrokeshire Coast NPA was praised by the Welsh Language Board for its progress on mainstreaming the Welsh language into its policies and strategies

- **High standards of service delivery** e.g. in 2012 Snowdonia NPA received a Customer Service Excellence Standard certificate from the Cabinet Office[42] for achieving an exceptional standard in providing customer service, with particular commendation for listening and understanding the needs of users before investing to improve its service provision. This award has been retained for 2013. Snowdonia NPA has been highly commended by the WLGA in its Excellence Wales Awards for its response to climate change

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[40] Letter to the Chairs of the 3 NPAs, 10 May 2013
[41] http://www.wao.gov.uk/assets/englishdocuments/Brecon_NPA_AIR_2013.pdf
http://www.wao.gov.uk/assets/englishdocuments/Pembrokeshire_NPA_AIR_English.pdf
http://www.wao.gov.uk/assets/englishdocuments/Snowdonia_NPA_AIR_2013_English.pdf
[42] http://www.eryri-npa.gov.uk/park-authority/newsroom/press-releases-2012/2012-09-05

- **Efficient and effective corporate planning and resource management**: the finances of each NPA are managed soundly resulting in debt-free authorities; each NPA has a corporate management team that works with the Chief Executive to provide leadership, vision and strategic direction, define corporate culture and promote core values and ensure statutory obligations are met and sound corporate governance; NPAs receive very low levels of complaints from the public or service users, including to the ombudsman

- **Pursuit of innovation** – the NPAs use their partnerships and Sustainable Development Funds to support and foster innovation e.g. Pembrokeshire Coast NPA's creation of the nationally acclaimed coastal land management scheme "Conserving the Coastal Slopes", which has now evolved into the Conserving the Park land management scheme, creating the first local conservation grazing scheme in Wales

- **Continual performance review and improvement** – Brecon Beacons NPA and Pembrokeshire Coast NPA undertook a pilot project to develop a scrutiny model for NPAs. A scrutiny tool kit was produced along with reports on the contribution of the Sustainable Development Fund and the management of Public Rights of Way. Since then both NPAs have undertaken scrutiny projects, with the Pembrokeshire Coast scrutinising the delivery of its affordable housing polices. All three NPAs are about to commence a joint scrutiny of economic development in the National Parks

- **Trailblazing and exemplifying sustainable development** e.g. the Brecon Beacons NPA kick-started the Green Valleys initiative[43] by providing advice, funding and officer time through a secondment. This scheme is now widely recognised as a leader in community involvement in sustainable development. Snowdonia NPA has achieved Level 3 of the Seren Environmental Management Standard and Pembrokeshire Coast NPA has achieved Green Dragon level 4.

6.2   As explained in Section 3, NPAs are experts in harnessing the resources and opportunities that flow from partnership working and applying these for the benefit of service delivery in the National Park e.g. the Brecon Beacons NPA leads a diverse partnership to control the impacts of recreation in the popular waterfalls area near Pontneddfechan, which is internationally important for its wildlife. This has reduced impacts and delivered footpath restoration, renewed signage and interpretation, a gorge walking code of conduct (the development of which was led by outdoor providers) and increased awareness of the area's rich natural and cultural history.

6.3   NPAs demonstrate leadership within Wales in a number of areas e.g. on social inclusion the Pembrokeshire Coast NPA has been active in engaging black and minority ethnic groups through the Mosaic Cymru initiative[44], children and excluded young people through its work with schools and Go4it[45] and in promoting the use of the National Park for health and well being through Walkability[46].

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[43] http://www.thegreenvalleys.org/
[44] Across Wales 53 Mosaic champions have introduced 580 people from BME urban communities to National Parks since 2012
http://www.pembrokeshirecoast.org.uk/Files/files/Committee/NPA/13_06_26_Ordinary/38_13%20Mosaic%20Project%20Update.pdf
[45] http://www.pembrokeshirecoast.org.uk/?PID=192
[46] http://www.pembrokeshirecoast.org.uk/?PID=67&NewsItem=1311

7.0   Welsh Government and National Assembly for Wales

7.1   The Welsh Government sets clear priorities and outcomes for the NPAs in Wales in the form of a strategic grant letter (annex 5), which is published each Spring. This also includes details of the resources available to the Authorities to deliver these priorities.

7.2   For 2013-14[47], the priorities include:

- National Parks should be exemplars of sustainable development; living, working landscapes with vibrant rural economies, thriving ecosystems and biodiversity, and extensive recreation opportunities;

- A more integrated approach to managing the natural environment that improves the health of ecosystems;

- Collaboration on cross-cutting issues such as economic development, housing, transport, cultural heritage and education.

7.3   The NPAs are funded by a Grant from the Welsh Government, with additional capital funding for specific projects and an amount levied from the Parks' constituent local authorities (which is included within those authorities' local government settlement).

National Park Authority	National Park Grant (2013-14)	With levy & additional capital funding	Additional funds raised by the NPA (2012-13)
Brecon Beacons	£3,387,834	£4,630,779	£1,821,043
Pembrokeshire Coast	£3,540,433	£4,837,244	£2,044,000
Snowdonia	£4,488,733	£6,101,644	£1,528,847

7.4   £200,000 of this grant is ring-fenced by each NPA to support sustainable development projects within or in close proximity to the Parks, which helps to embed sustainable development as a central organising principle of NPAs and promote innovation.

7.5   These Sustainable Development Funds have contributed to a wide range of projects including conservation, education, renewable energy and social inclusion e.g. in the Pembrokeshire Coast projects include pilot construction of an affordable timber house[48] (with the objective of factory production and construction of a house for about £50,000) and the recycling of waste vegetable oil into a renewable and sustainable fuel source[49].

7.6   The Funds are also concerned with the future viability of the communities within National Parks e.g. in Snowdonia the Fund has supported a Skills Centre in Dolgellau which will provide training for learners 14-16, 16-19, adults and businesses to increase the present and future skills level, in order to promote the green economy in Meirionnydd and Mid Wales. It is envisaged that 817 individuals will benefit from the centre over the next three years.

7.7   The Funds also provide direct financial support to local businesses e.g. in the Brecon Beacons support was given to the Myddfai trading company, which aims to support social, recreational, welfare and employment opportunities in and around Myddfai, helping this small business to achieve economies of scale and to compete in difficult economic conditions.

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[47] Letter from the Minister for Culture and Sport to the Chairs of the 3 NPAs (10 May 2013)
[48] http://www.coedcymru.org.uk/images/user/CABAN%20UNNOS%20FLYER%20C%20(2).pdf
[49] http://www.pembrokeshirecoast.org.uk/?PID=467&SDFID=32

7.8   The Sustainable Development Funds have a strong multiplier effect in terms of cash matching, volunteer hours and in-kind contributions[50]. For every £1 granted by the fund, approximately £5 is attracted to the National Parks.

7.9   NPAs have an excellent track record in raising additional income through grants and other sources – e.g. in 2012-13 the Brecon Beacons generated £1,821,043 in grants and funding, equivalent to 29% of the total operating cost of the Authority.   The three NPAs generated additional funds of over £5 million in 2012-13.

7.10   Welsh Government policy on National Parks is set out in a Policy Statement on National Parks and NPAs[51] with the current vision set out in annex 10; a replacement Policy Statement[52] has been issued for public consultation until 20 September 2013. Currently, the Welsh Government appoints one-third of NPA members[53] who are highly valued because of the skills and national perspective that they bring to the NPAs.

7.11   The NPAs are subject to a number of scrutiny arrangements due to their status as Assembly Sponsored Public Bodies. This includes six-monthly reporting on performance against the priorities in the Strategic Grant Letter, six-monthly meetings with the Minister, performance indicators for the Sustainable Development Fund and participation in scrutiny inquiries by the National Assembly for Wales Environment and Sustainability Committee[54]. National Parks are the responsibility of the Minister for Culture and Sport[55].

7.12   **The current sponsorship and scrutiny arrangements provide the Welsh Government with direct powers and control over Wales' National Parks, which is appropriate given their national and international significance. The ceding of powers from NPAs to local government would remove these powers from the Welsh Government, which could lead to inconsistent services and standards, a loss of cohesive management, reduced levels of funding and increased parochialism.**

8.0   Conclusion

8.1   This submission sets out how the three NPAs deliver value for Wales' environment and economy, local communities within their boundaries and the millions of visitors they receive each year. It also explains how we contribute to the international reputation of Wales as a nation committed to sustainable development.

8.2   While we are constantly striving to achieve and share best practice and have an excellent record on service delivery and improvement, including on planning, we are receptive to new ways of working that will improve our ability to deliver effectively and efficiently.

8.3   The Minister for Culture and Sport has signalled his intention[56] to review the governance arrangements for National Parks once the Commission for Public Service Governance and Delivery has delivered its report. This review will include reflection on the nature of accountability to Welsh Ministers and the administration of the authorities.

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[50] See pages 4 and 5 of http://www.beacons-npa.gov.uk/the-authority/who-we-are/scrutiny/sustainable-development-fund-scrutiny-report
[51] Policy Statement for National Parks and National Park Authorities, Welsh Government (March 2007) http://wales.gov.uk/about/cabinet/cabinetstatements/2007/1321477/?lang=en
[52] Consultation on the draft Policy Statement for Protected Landscapes in Wales, Welsh Government (June 2013)
[53] Letter from Welsh Government to Powys County Council http://www.powys.gov.uk/rep_2012-07-12cc1_115.2a_en.pdf?id=47
[54] http://www.senedd.assemblywales.org/mgCommitteeDetails.aspx?ID=225
[55] http://wales.gov.uk/topics/cultureandsport/?lang=en
[56] Letter to the Chairs of the 3 NPAs, 10 May 2013

8.4   We look forward to discussing this submission with the Commission and with the Welsh Government during its review of our governance arrangements.

List of annexes

Annex 1
Valuing Wales' National Parks. ARUP. August 2013

Annex 2
Letter from Llanberis Community Council to Snowdonia NPA (5 December 2005)

Annex 3
Letter from Ffestiniog Town Council to Snowdonia NPA (14 October 2009)

Annex 4
Delivery of Planning Services in Statutory Designated Landscapes in Wales. Summary
Report from Phase 1. Prepared for the Welsh Government by Land Use Consultants.
August 2011

Annex 5
Strategic grant letter for 2013-14 and funding annex

Annex 6
Table of speed of determining planning applications. Welsh Government. January to March
2013

Annex 7
Renewable energy schemes determined by NPAs between April 2007 and March 2011

Annex 8 and 8A
Governance, Delivery and Scrutiny in National Park Authorities
The Golden Thread – NPA corporate planning and improvement framework

Annex 9
Study into Joint Working Opportunities for the Planning Departments of the three Welsh
National Parks. Interim Report for Steering Group. Land Use Consultants. June 2013

Annex 10

Welsh Government vision for National Parks (2007 Policy Statement)

Atodiad 1 / Annexe 1

Gwerthfawrogi Parciau Cenedlaethol Eryri. Awst 2013 -
Yr adroddiad ar gael i'r Comisiwn ym mis Medi ac yn cael ei gyhoeddi yn swyddogol ym mis Tachwedd 2013

Valuing Wales' National Parks. August 2013 –
The report will be available to the Commission in September and will be formally published in November 2013

CYNGOR CYMUNED LLANBERIS

Clerc i'r Cyngor: Dei Tomos

Aneurin Phillips - Swyddog y Parc
Parc Cenedlaethol Eryri
Swyddfa'r Parc
PENRHYNDEUDRAETH
Gwynedd. LL48 6LF

5ed o Ragfyr 2005.

Annwyl Aneurin Phillips

Ffiniau'r Parc Cenedlaethol

Mewn cyfarfod o'r Cyngor Cymuned yn mis Tachwedd trafodwyd ffiniau'r Parc Cenedlaethol.

Bu son fel y mae natur y pentref a chymeriad y fro wedi newid yn arw ers hanner canrif a rhagor ers pan sefydlwyd y Parc Cenedlaethol yn 1951. Yr adeg honno pentre diwydiannol oedd Llanberis, ond bellach fe newidiodd cymeriad y lle yn llwyr. Roedd cryn deimlad yn y cyfarfod y dylai'r pentref berthyn i Barc Cenedlaethol Eryri yn hytrach na gorwedd ar ei gyrion.
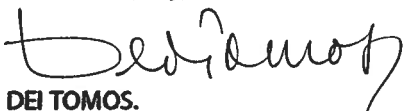
Yn y dyddiau pell rheini roedd cryn wrthwynebiad i ffurfio Parc Cenedlaethol yn Eryri ac yn arbennig gwrthwynebiad o du'r Cyngor Sir. Bryd hynny mae'n debyg roedd hi'n iawn fod pentrefi ac ardaloedd chwarelyddol Meirion ac Arfon wedi ei gadael allan wrth greu'r Parc.

Heddiw mae pethau'n wahanol, ac mae Cyngor Cymuned Llanberis o'r farn fod angen newid ffiniau'r Parc i adlewyrchu'r oes, a gresynwyd na welodd y gwleidyddion yn dda ym Mae Caerdydd i ystyried ffiniau wrth gynnal yr adolygiad diweddar ar y Parciau Cenedlaethol Cymreig.

Yn ein cyfarfod pleidleisiwyd o blaid cynnwys plwyf Llanberis o fewn y Parc a gofynnwyd i mi anfon atoch i fynegi hynny, ac i ofyn eich Cyngor ynglyn a gwireddu hynny.

Tybed a fyddai modd i'r mater gael ystyriaeth gennych er y gwyddom wrth gwrs mai nid mater i'r Awdurdod yn uniongyrchol ydi hwn yn y pen draw.

Pob dymuniad da,
Yr eiddoch yn gywir,

DEI TOMOS.

Mr Aneurin Phillips
Prif Weithredwr
Awdurdod Parc Cenedlaethol Eryri
Swyddfa'r Parc Cenedlaethol
Penrhyndeudraeth
Gwynedd
LL48 6LF

14eg Hydref 2009

Annwyl Syr

Yng nghyfarfod arferol o Gyngor Tref Ffestiniog a gynhaliwyd nos Iau, 8fed o Hydref 2009 rhoddwyd Rhybudd o Gynigiad gan y Cynghorydd Gwilym Euros Roberts.

Gofynnodd y Cynghorydd Gwilym Euros Roberts i'r Cyngor Tref alw ar Awdurdod Parc Cenedlaethol Eryri i gynnwys tref Blaenau Ffestiniog a'r ardal gyfagos o fewn ffinnau y Parc Cenedlaethol gan fod hanes diwydiannol a diwylliannol yr ardal arbennig hon yn rhywbeth y dylid ei warchod a'i drysori fel rhannau eraill o'r Parc Cenedlaethol. Yn dilyn trafodaeth eiliwyd y cynnig ar bleidlais y mwyafrif.

Byddwn yn ddiolchgar os bydd y cais hwn yn cael ei ystyried gan Awdurdod Parc Cenedlaethol Eryri ac edrychaf ymlaen at gael gwybodaeth gennych ynglŷn â'r cam nesaf yn y broses.

Yr eiddoch yn gywir

Ann M Coxon
Clerc y Dref

Delivery of Planning Services in Statutory Designated Landscapes in Wales

Final Report

Delivery of Planning Services in Statutory Designated Landscapes in Wales

This research was prepared for Planning Division of the Welsh Government by LUC in August 2012

www.landuse.co.uk

Contents

Executive Summary

Background

This comparative study (running from June 2011 – July 2012) undertaken for Welsh Government has assessed the effectiveness of planning service delivery in statutory designated landscapes (Areas of Outstanding Natural Beauty (AONBs) and National Parks). It has involved review of planning service delivery under different models in the statutory designated landscapes of Wales, England and Scotland; detailed comparative analysis of planning service delivery in statutory designated landscapes in Wales; and stakeholder workshops to discuss findings.

As set out in Planning Policy Wales, "National Parks and AONBs [that together cover 25% of Wales] are of equal status in terms of landscape and scenic beauty and both must be afforded the highest status of protection from inappropriate developments"[1] through both development plan policies and development control decisions. Both National Parks and AONBs are landscapes of national and international importance.

Each National Park in Wales has its own National Park Authority. This is also the planning authority. The other main local authority functions, including economic development and housing, remain with the constituent local authorities of the National Parks. Across AONBs by comparison, planning functions (and all other local authority functions) remain with their constituent local authorities.

This comparative study has identified that planning delivery is, in many respects, similar between AONBs and National Parks with the planning approval rate in AONBs being 84.5% and similar in the National Parks (Snowdonia 87%, Pembrokeshire Coast 85%[2]), and the percentage of applications determined within 8 weeks being on average 64% in both the constituent authorities of AONBs and in the National Parks.

Specific recommendations that have emerged from this comparative study are in the context of needing to:

- conserve and enhance the special landscapes of National Parks and AONBs, reflecting the importance placed on them in statute and in Planning Policy Wales, ensuring that these landscapes are passed on to future generations in as good if not better state than they are now;

- but in so doing ensuring that viable communities and local businesses are able to thrive in harmony with the landscape, demonstrating the very best in sustainable development.

To do this, the planning system needs to recognise the national importance of these statutory designated landscapes, pro-actively support their communities and businesses and have the evidence and policies needed to support sound decision-making.

Recommendations

Key findings and proposed recommendations set out in this report are:

1) Improved information on landscape and landscape tools: National Parks and AONBs are first and foremost landscape designations yet landscape issues are not well covered in national guidance. This suggests that relevant TANs and the revised National Policy Statement on National Parks and AONBs should promote sound landscape planning and the use of landscape character assessment as an important evidence base to inform development decisions, building on LANDMAP.

2) Improved policy framework at the local level: This research has identified the value of planning to the boundaries of the statutory designated landscapes to achieve the purposes of designation, as exemplified by National Park Local Plans. But the policy framework is weaker for AONBs, suggesting the benefit of Supplementary Planning Guidance (SPG) that can guide planning decisions within AONBs, working to their boundaries and responding to local circumstances. In all cases local planning

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[1] Planning Policy Wales 5.3.6

[2] These figures are for the year 2008/09 for which comparative figures were available. The figures for Brecon Beacons National Park have varied. In 2008/09 73% of applications were approved. For the financial year 2011 83.5% were approved.

should be informed by a sound evidence-base on the local economy and landscape character.

3) Improved perception of planning in statutory designated landscapes. There is a long held perception that planning within statutory designated landscapes stands in the way of community and business development. Overcoming this perception requires a range of focused activities: the preparation of Sustainable Development Strategies for individual statutory designated landscapes; setting up of Planning Advisory Groups to advise on planning delivery; setting targets for the approval of commercial developments; and developing collaborative approaches with local communities planning the future of their area.

4) Partnership working between planning and the socio-economic functions of local authorities. The split between the planning functions of the National Park Authorities and the socio-economic functions of their constituent authorities necessitates close partnership working and mutual understanding and respect between the two. It equally applies to the planning and socio-economic functions of the constituent authorities of AONBs who may equally operate largely in isolation. This suggests every opportunity for joint working should be explored, linking planning with socio-economic responsibilities; sharing of staff resources to enable specialist staff to be employed (including landscape staff) and to achieve resource efficiencies; and developing an on-going dialogue between planning and socio-economic functions.

5) Bringing consistency to development management. This study has identified general concern about inconsistency in planning determinations. This relates to all LPAs but especially those that have a high percentage of rural applications (as in National Parks and AONBs) which, by their very nature, tend to be unique. Achieving greater consistency will be helped by ensuring that: there is a strong and consistent planning framework in place; valued

pre-application advice provided by LPAs is recorded; written guidance tailored to local circumstances is available to inform both applicants, development management officers, and members of the planning committee; the right specialists should be available to advise on individual planning applications; all planning authorities associated with statutory designated landscapes should have access to landscape advice; and members and planning officers should benefit from consistent training relating to statutory designated landscapes and desired outcomes.

6) Governance. Through stakeholder consultation, it has been highlighted that there is poor local community representation on some National Park Authorities, meaning that planning decisions may be decided by people with no direct association with the Park area. Equally it is noted that there is little consistency in the structure and governance of Joint Advisory Committees of AONBs. It is suggested therefore that greater consistency should be brought to the structure and governance of AONB Joint Advisory Committees (JACs).

7) Performance monitoring. There is little national reporting on the performance of planning within the statutory designated landscapes. This needs to be addressed so that any criticism of planning in National Parks and AONBs are based on facts. This suggests the need for monitoring against the following indicators: % of planning applications and separately the % of commercial (economic) planning applications; the quality of the planning outcomes, i.e. the suitability of development taking place within National Parks and AONBs with their statutory landscape purposes; and the % of planning decisions that (a) have gone against Community Council recommendations and (b) within AONBs, the % of planning decisions that have gone against the recommendation of the JAC / AONB officer.

1   Introduction

1.1   LUC was commissioned by the Welsh Government in June 2011 to undertake a "comparative study to evaluate the delivery of planning services in the two different types of statutory landscape designations [National Parks and Areas of Outstanding Natural Beauty (AONBs)] in Wales." The objectives of this study are to:

- Assess the effectiveness of the delivery of planning services within statutory designated landscapes.

- Identify examples of good practice in the delivery of planning services within statutory designated landscapes.

- Identify barriers to the effective delivery of planning services within the statutory designated landscapes.

- Suggest improvements for the delivery of planning services within statutory designated landscapes.

1.2   Our original methodology involved three phases, corresponding to the three main requirements of the Welsh Government's brief:

- Phase 1: Comparative study with statutory designated landscapes in other parts of the UK.

- Phase 2: Detailed comparative analysis of planning services and outcomes in statutory designated landscapes in Wales.

- Phase 3: Stakeholder analysis to evaluate perceptions of the effectiveness of planning services in statutory designated landscapes in Wales.

1.3   LUC has prepared the following reports during this study:

- **A Phase 1 report** (August 2011), explaining the method and summarising the findings of the first phase of work, which involved describing the models for the delivery of planning services in Statutory Designated Landscapes in Wales and other parts of the UK, and comparing and contrasting how planning functions are discharged in the different models.

- **A Phase 2 report** (July 2012), explaining the method and summarising the findings of the second and third phases of work, which were combined as Phase 2.

- **A Summary Workshop Report** (July 2012), summarising the methods and key draft conclusions from the Phase 1 and 2 reports. This report was circulated to workshop invitees, comprising (a) NPA planners and planners of the constituent local authorities of the National Parks and AONBs, (b) housing and economic development officers of the constituent authorities of National Parks and AONBs, (c) AONB officers, as well as (d) representatives of national and local environmental and business organisations. Two stakeholder workshops were held at the end of July 2012 (one in north Wales and one in south Wales) to help test the emerging conclusions and recommendations from Phases 1 and 2, allow for constructive debate and to help inform the preparation of the final report and conclusions.

- **Final Report** (September 2012), this report, which summarises the approach taken to all phases of the study and the key findings, and sets out the conclusions and recommendations.

1.4   The earlier reports are available from Welsh Government upon request.

A brief introduction to the Welsh National Parks and AONBs

1.5   **Figure 1** shows the location of National Parks and AONBs in Wales, as well as the local authority boundaries. Note that in November 2011 it was announced that the boundary of Clwydian Range AONB was to be extended to form the Clwydian Range and Dee Valley AONB. This means that

the AONB now includes parts of Wrexham as well as Flintshire and Denbighshire. However, because this change occurred after the study had commenced, Wrexham has not been included in the study, although the name Clwydian Range and Dee Valley AONB is used throughout this final report.

Statutory purposes and status

1.6   The two statutory purposes of National Parks in Wales and England, as set out in the Environment Act 1995 (Section 61) are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area

- To promote the opportunities for the understanding and enjoyment of the special qualities of their area by the public.

Planning Policy Wales explains that where there appears to be a conflict between these purposes, greater weight shall be given to the first.

1.7   Under Section 62(1) of the Environment Act the National Park Authorities also have a duty to "foster the economic and social well-being of local communities within the National Parks but without incurring significant expenditure in doing so….."

1.8   In the case of AONBs, under the National Parks and Access to Countryside Act their sole statutory purpose is: "to conserve and enhance the natural beauty of the area". Planning Policy Wales states that development plan policies and development control decisions affecting AONBs should favour conservation of natural beauty, although it will also be appropriate to have regard to the economic and social well-being of the areas [5.3.5].

1.9   In terms of their landscape, both statutory designated landscapes are of equal (national) importance. This is recognised by Planning Policy Wales which states [5.3.6] "National Parks and AONBs are of equal status in terms of landscape and scenic beauty and both must be afforded the highest status of protection from inappropriate developments. In development plan policies and development control decisions National Parks and AONBs must be treated as of equivalent status. In National Parks and AONBs, development plan policies and development control decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas".

1.10   Planning Policy Wales goes on to note that [5.5.5] "proposals for development must be carefully assessed for their effect on those natural heritage interests which the designation is intended to protect". Also noting that [5.5.6] "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". Nevertheless, in planning for sustainability the more general guidance for rural areas contained in Planning Policy Wales will apply to statutory designated landscapes so long as this does not compromise the conservation and enhancement of their natural beauty, wildlife and cultural heritage. These priorities for rural areas, as set out in Planning Policy Wales are to secure [4.5.3] "sustainable rural communities with access to affordable housing and high quality public services; a thriving and diverse local economy where agriculture-related activities are complemented by sustainable tourism and other forms of employment in a working countryside; and an attractive, ecologically rich and accessible countryside in which the environment and biodiversity are conserved and enhanced".

National Park Authorities and AONB staff

1.11   In Wales each National Park has its own National Park Authority (NPA) which is also the statutory Planning Authority for the Park area. The NPAs employ a significant complement of staff (see Chapter 3) to deliver their planning and other responsibilities. However the constituent local authorities of the National Parks continue to be responsible for all other local authority services including housing provision and economic development. By comparison, AONBs will usually have a complement of two to four staff including the AONB officer, combined with limited funds and less by way of special governance arrangements compared to National Parks.

Delivery of planning services in National Parks and AONBs

1.12   There is a clear distinction between the way planning services are delivered in National Parks and AONBs in Wales (and indeed across the UK). The National Park Authorities (NPAs) are responsible for all aspects of forward planning and development management within the National Park. On the other hand, within AONBs, all aspects of planning remain the responsibility of the constituent local planning authorities of the AONB, although the AONB Units / Joint Advisory Committees (JACs) of AONBs may be consulted on individual planning applications within the AONB.

1.13   The clear difference is that planning within National Parks is planned and conducted to the boundary of the statutory landscape, which reflects the extent of the 'special' landscape of national importance. On the other hand, planning within AONBs is conducted to administrative boundaries over which is superimposed the boundary of the 'special' landscape, which may be taken into account to varying degrees in all aspects of planning.

Geography of National Parks and AONBs

1.14   **Table 1.1** illustrates the percentage of each AONB falling in each of their local authority areas.

Table 1.1: Percentage of AONB area covered by each Local Planning Authority

Local Authority	% of AONB falling in local authority area				
	Wye Valley	**Gower**	**Clwydian Range and Dee Valley**	**Anglesey**	**Llŷn**
Sir Fynwy - Monmouthshire	**36**	n/a	n/a	n/a	n/a
County of Herefordshire (England)	*46*	*n/a*	*n/a*	*n/a*	*n/a*
Forest of Dean District (England)	*18*	*n/a*	*n/a*	*n/a*	*n/a*
Abertawe – Swansea	n/a	**96**	n/a	n/a	n/a
Sir Gaerfyrddin - Carmarthenshire	n/a	**4**	n/a	n/a	n/a
Sir y Fflint - Flintshire	n/a	n/a	**33**	n/a	n/a
Sir Ddinbych - Denbighshire	n/a	n/a	**67**	n/a	n/a
Sir Ynys Môn - Isle of Anglesey	n/a	n/a	n/a	**100**	n/a
Gwynedd - Gwynedd	n/a	n/a	n/a	n/a	**100**

1.15   The constituent local authorities of the National Parks are:

● Brecon Beacons: Powys, Carmarthenshire, Monmouthshire, Blaenau Gwent, Merthyr Tydfil, Rhondda Cynon Taff, Torfaen County/Borough Councils.

● Snowdonia: Conwy and Gwynedd County Councils.

● Pembrokeshire Coast: Pembrokeshire County Council.

1.16   In terms of area, the National Parks cover some 20% of the total area of Wales although are home to only 2.9% of the Welsh population – roughly 83,300 people (see **Table 1.2**). By comparison the five AONBs together only cover some 5% of Wales.

Table 1.2: Area and Population of each National Park

	Brecon Beacons	**Pembrokeshire Coast**	**Snowdonia**
Area (km)	1,370km	620km	2,323km
Population (2008)[3]	32,700	22,100	25,700

Similarities between National Parks and AONBs

1.17   Nevertheless, there are also considerable similarities between National Parks and AONBs:

- Both derive from the same legislation (1949 National Park and Access to Countryside Act et seq.)

- They are of comparable status in terms of landscape protection.

- Both are Category V protected areas[4].

- Section 62(2) relating to National Parks in the 1995 Act is now mirrored for AONBs by Section 85 of the CRoW Act 2000.

- The Sustainable Development Fund (SDF) programme applies to both designations.

- Like NPAs, AONB authorities have a statutory duty to prepare a Management Plan for their area under the CRoW Act 2000.

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[3] Statistics for Wales (April 2011) Population Projections for National Parks in Wales, 2008-based.

[4] This is an International Union for the Conservation of Nature (IUCN) category which means *"a protected area where the interaction of people and nature over time has produced an area of distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values"*.

Planning in Statutory Designated Landscapes

Figure 1

Location of Wales's Statutory Landscape Designations

Local Authority boundaries

Area of Outstanding Natural Beauty (AONB)

- Bryniau Clwyd a Dyffryn Dyfrdwy/ Clwydian Range and Dee Valley
- Gŵyr/Gower
- Llŷn
- Ynys Môn/Anglesey
- Dyffryn Gwy/Wye Valley

National Parks

- Bannau Brycheiniog/Brecon Beacons
- Arfordir Penfro/Pembrokeshire Coast
- Eryri/Snowdonia
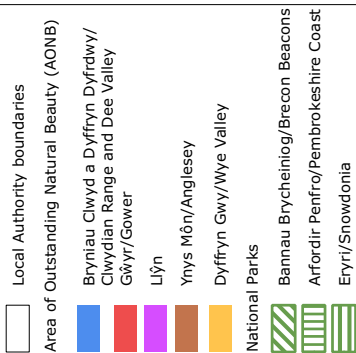
Map Scale @ A3:1:1,000,000

LUC

Source:

0   10   20 km

N
W   E
S

Wrexham
Flintshire
Denbighshire
Conwy
Isle of Anglesey
Gwynedd
Ceredigion
Pembrokeshire
Carmarthenshire
Powys
Monmouthshire
Torfaen
Blaenau Gwent
Caerphilly
Newport
Merthyr Tydfil
Cardiff
Neath Port Talbot
Bridgend
The Vale of Glamorgan
Rhondda, Cynon, Taff
Swansea
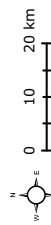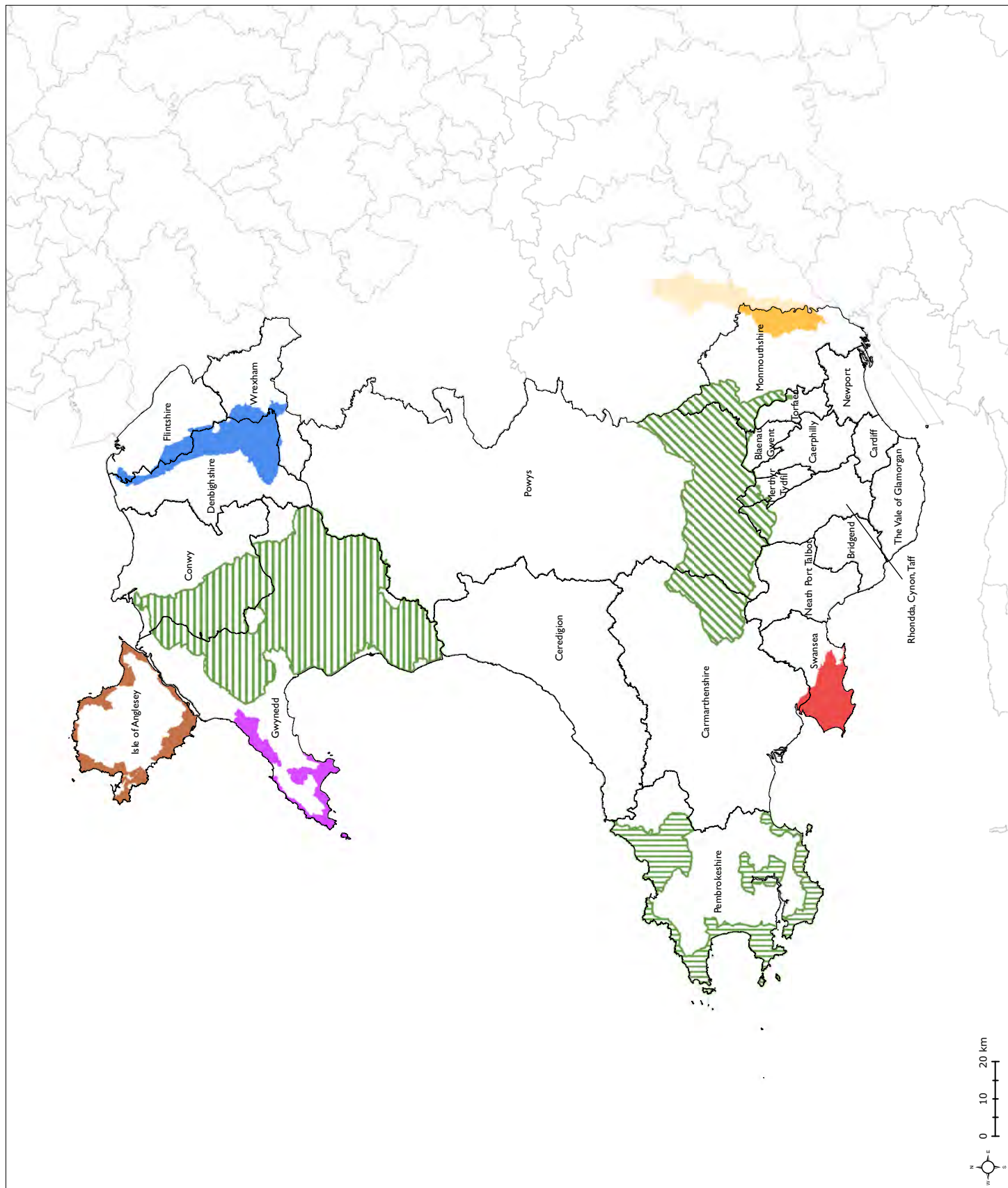
2   Methodology

2.1   This Chapter describes the tasks undertaken during the study.

Phase 1: Comparative study of statutory designated landscape planning models in other parts of the UK

Planning Models of Statutory Designated Landscapes

2.2   In order to undertake the comparative analysis of planning services delivery in statutory designated landscapes in Wales with other parts of the UK, we identified different models of planning delivery across the statutory designated landscapes of the UK, as shown in **Figure 2.1**.

2.3   The categorisation of planning models shown in **Figure 2.1** starts with the National Parks in Wales where planning is clearly to the designated landscape boundary and then looks at other planning approaches where successively greater planning powers rest with the constituent local authorities of the statutory designated landscapes and where, in theory, planning is increasingly to the boundaries of individual local authority areas.

Tasks undertaken in Phase 1

2.4   Phase 1 involved two main tasks:

- Describing the different planning delivery models at each level of the hierarchy.

- Comparing and contrasting how planning services are delivered within the same tiers of the hierarchy and between the different models considered in Wales, England and Scotland.

2.5   For both tasks we reviewed the different planning delivery models used in the following examples representing each level of the hierarchy:

- **National Park Authorities with full planning powers:** the three National Park Authorities in Wales;

- **National Park Authorities with shared planning powers:** South Downs in England and Cairngorms in Scotland;

- **AONBs with Conservation Boards:** Cotswolds and Chilterns AONBs in England where planning powers rest with the constituent local authorities as they do in all the other models below;

- **AONBs with Joint Advisory Committees:** the five Welsh AONBs;

- **National Scenic Areas (NSAs) with Management Strategies adopted as SPG:** Dumfries and Galloway Council in Scotland, which has three NSAs each with its own Management Strategy;

- **National Scenic Areas without Management Strategies:** Scottish Borders Council, which has two NSAs without Management Strategies.

2.6   For each example we reviewed the relevant websites **and interviewed the relevant NPA, AONB, NSA or planning officer** in order to describe the organisational structures, governance arrangements, where responsibility lies for planning decisions (e.g. within the National Park Authority, or within one or more LPAs in which an AONB is situated) and how processes are undertaken and decisions made in the following planning services:

- Development plan production

- Development management processes including appeals

2.7   In addition, for the Scottish examples, we spoke to an officer at Scottish Natural Heritage (SNH) to obtain a more general view about how services were delivered across the range of 40 NSAs in Scotland. This is because SNH has specific statutory powers with regard to planning in the NSAs.

Figure 2.1: Categorisation of Statutory Designated Landscapes with regard to the exercise of planning functions (England, Wales & Scotland)

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1. National Park Authorities with full planning powers

(applies to all in England, Wales and Scotland apart from the South Downs and the Cairngorms)

⇩

2. National Park Authorities with shared planning powers

(Cairngorms National Park, Scotland – five constituent LPAs deal with most planning applications but CNPA decides whether to call some in; and South Downs National Park – 15 constituent LPAs deal with most planning applications; NPA deals with applications for more significant development within the National Park)

⇩

3. AONBs with Conservation Boards

(Cotswolds and the Chilterns: no planning powers but have a Planning Committee and Planning Officer who comment on planning applications in the AONB)

⇩

4. AONBs with Joint Advisory Committees

(remaining English and all Welsh AONBs: able to comment on planning applications; a few employ their own Planning Officer)

⇩

5. NSAs with Management Strategies adopted as SPGs

(Dumfries and Galloway: 3 NSAs have Strategies and the Council employs an NSA officer to oversee their implementation)

⇩

6. NSAs without Management Strategies

(37 out of the 40 NSAs: as for all NSAs, SNH to be consulted on any development proposals within certain defined categories and local authorities to ensure development does not detract from the NSA landscape quality/character or impact on important views in or out)

Phase 2: Comparative analysis (including stakeholder perceptions) of planning services and outcomes in statutory designated landscapes in Wales

Developing an Evaluation/Assessment Framework

2.8 The first step in this phase was the development of an evaluation/assessment framework to enable more detailed assessment of how well specific planning services are delivered within the statutory designated landscapes.

2.9 The purpose of the evaluation/assessment framework is to assess 'how' (the process by which) the planning functions are delivered within the statutory designated landscapes of Wales.

2.10 This evaluation/assessment framework consisted of a set of criteria/questions designed to assess how effectively and efficiently planning services are undertaken within the Welsh AONBs and National Parks (e.g. through questions relating to the provision of pre-application advice or member training). Questions in the framework also sought to address both the nature of planning policy prepared (e.g. questions relating to the coverage of the purposes of designation within local development plans (LDPs)) and the extent to which policies relating to AONBs and National Parks are used in determining planning applications to see whether outcomes are likely to reflect the purpose of the statutory landscape designations. Clearly, to assess the quality of the actual outcomes on the ground would have required site visits to individual application sites, which was beyond the scope of this study. As much as possible, an indication of quality of outcomes was sought through speaking to relevant stakeholders about their perceptions of the planning process and its outcomes.

2.11 This evaluation/assessment framework has drawn on other sources where relevant, such as Planning Policy Wales 2011, the Tests of Soundness for examining LDPs, the PricewaterhouseCoopers evaluation framework used in its February 2011 review of planning services in the Welsh National Parks[5] and the national performance indicators[6] relating to planning.

2.12 It is important to note that the Phase 2 report does not seek to set out answers to every question in the framework. Rather, the framework has provided a mechanism through which information could be gathered, and from which key issues and emerging themes could then be identified. The key issues covered in the framework are discussed directly within specific sections of the Phase 2 report, while other questions have fed into the overall picture in an indirect way, providing evidence relating to a number of the themes considered in the report.

2.13 The evaluation/assessment framework is shown in **Appendix 1**. It is divided into five parts, corresponding to five different elements of planning service delivery and outcomes (plan preparation, plan policies, development management process, example planning applications and enforcement). The questions were colour coded as follows, based on the primary sources that would be used to answer them:

- Green – questions to be answered mainly from review of the LDP and associated information available online.

- Blue – questions to be answered mainly from Annual Monitoring Reports for the LDPs (where available).

- Yellow – questions to be answered mainly from the telephone interviews conducted with AONB Officers and Local Authority officers (see below).

- Pink – questions to be answered mainly from the planning application case studies looked at within each statutory landscape.

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[5] PricewaterhouseCoopers (February 2011) Welsh National Park Authorities Planning Services Review – Stage 2 Part B Technical Supplement.

[6] Data Unit Wales. National Performance Indicator Guidance for Wales 2010-2011: http://www.dataunitwales.gov.uk/Publication.asp?id=SX8E1A-A77FF955

2.14   Other sources of information, such as the telephone interviews with stakeholders and Local Authority officers (described later in this section) fed into different parts of the framework, depending on the particular views and experience of each person/organisation being interviewed.

2.15   A range of tasks was undertaken to gather the information necessary to answer the questions in the framework, and to thereby compare the delivery of planning services within National Parks and AONBs. The tasks undertaken are described in more detail below and included:

- Review of Local Development Plans (LDPs).

- Interviews with development management officers.

- Interviews with Heads of Planning.

- Interviews with Council Members.

- Interviews with affordable housing officers of the constituent authorities.

- Interviews with economic development/regeneration officers of the constituent authorities.

- Interviews with stakeholders.

- Reviewing example planning applications.

- Individual applicants' questionnaire.

- Community Councils' questionnaire.

- Review of associated reports and studies on planning practice and monitoring indicators.

2.16   Interviews involved all the National Park Authorities (NPAs) and their constituent authorities, as well all the constituent authorities of the AONBs, with the exception of Anglesey Council (covering Anglesey AONB) who did not respond to requests for information and telephone interviews during this Phase of the study.

Review of Local Development Plans (LDPs)

2.17   The Local Development Plans (LDPs) for each relevant authority were reviewed. These were the latest available adopted version for each National Park Authority (NPA) and each of the six Welsh Local Planning Authorities (LPAs) in which the five AONBs lie, i.e. excluding Herefordshire County and Forest of Dean District which comprise part of the Wye Valley AONB but which are in England[7].

2.18   A large number of the authorities (all except Snowdonia and Pembrokeshire Coast NPAs) did not have an adopted LDP in place at the time of the review. In these cases, the existing planning policy framework was reviewed instead - in most cases this was the adopted UDP, although two authorities (Anglesey Council, within which Anglesey AONB is entirely located, and the Brecon Beacons NPA) had no adopted plan in place. The content of advanced draft versions of the emerging LDPs was also taken into account where relevant, although it is recognised that changes to these plans may occur until such time as they are adopted; therefore no significant weight can be given to their content at this point.

2.19   For each LDP (and UDP where relevant), the vision, aims/objectives and policies were reviewed in order to identify references to the statutory purposes of National Parks (and their special qualities) and AONBs, in line with the questions in Parts A and B of the evaluation/assessment framework.

Interviews with Development Management Officers

2.20   Separate interviews had been conducted with the Forward Planners of each NPA and LPA covering an AONB as part of Phase 1 of this study. As part of Phase 2, telephone interviews were conducted with the head of Development Management at each NPA and relevant LPAs (of the AONBs). These interviews covered planning policy and more particularly, development management and enforcement. These interviews sought to obtain the officers' views on:

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[7] Note that there is a seventh LPA that contains an area of AONB – part of Gower AONB falls within Carmarthenshire, but due to the very small size of this area it was not considered appropriate to include Carmarthenshire within the review.

- What works well in relation to the delivery of planning services (including examples of good practice).

- Any measures that have already been undertaken to improve service delivery.

- What does not work so well in relation to the delivery of planning services.

- What barriers exist to effective delivery of planning services.

- Any improvements they consider would help to improve delivery of planning services.

- Examples of good practice.

2.21 These telephone interviews focussed on the questions coloured yellow in the evaluation/assessment framework (see **Appendix 1**). Interviews were able to be conducted with Development Management officers at all of the relevant authorities except Anglesey Council.

Interviews with Heads of Planning

2.22 Telephone interviews were conducted with the Head of Planning at the constituent authorities of the National Parks and AONBs, excluding those that only cover a small part of the Brecon Beacons National Park. Therefore, the authorities that were interviewed included Monmouthshire, Swansea, Flintshire, Denbighshire, Gwynedd as well as Conwy Council (which includes part of Snowdonia National Park), Powys and Carmarthenshire Councils (which include part of the Brecon Beacons National Park). In addition, discussions with the Head of Planning at Gwynedd Council also covered Snowdonia National Park as well as Llŷn AONB.

2.23 The purpose of interviewing the Heads of Planning at the constituent authorities of the National Parks (i.e. those authorities which include parts of the National Parks but which are not responsible for planning in those areas) was to: gather a high-level overview of how planning services in the National Parks are perceived; to establish how the authorities work jointly with the relevant National Park Authorities, particularly in relation to planning applications for sites that are close to the National Park boundary; and to identify examples of good practice in joint working.

2.24 In the case of the AONB authorities, the aim of the interviews with the Heads of Planning was to obtain a high-level overview of the issues that the authority faces in relation to planning within the AONB, and the differences between planning within and outside of the statutory designated landscape. Consideration was also given to any internal processes that exist to ensure that there is consistency in approach between the planning, economic development and housing teams within the authorities. In addition, where the AONBs straddle the boundaries of more than one authority (Wye Valley and Clwydian Range and Dee Valley AONBs), questions focussed on joint working arrangements that are in place to ensure a consistent approach is taken across the AONB area by the constituent authorities.

2.25 Interviews were conducted with the Heads of Planning (or a nominated representative where appropriate) at all of the relevant authorities except Anglesey and Carmarthenshire Councils.

Interviews with Committee Members

2.26 Members have an important role to play in the delivery of planning services, particularly in relation to approving versions of LDPs for consultation and in determining planning applications. We therefore carried out telephone interviews with the Chair of the Planning Committee in each NPA and of the constituent local authorities of the AONBs, as they were best-placed to comment on the relevant issues.

2.27 A bilingual letter was sent out to the relevant Members, in order to explain the background to the study and the purpose of the interview. Interviews were arranged at a convenient time, bilingually (using a simultaneous translation service) where requested.

2.28 Questions covered the following themes:

- Whether there is a difference in the approach to planning services within and outside the AONB (AONBs only).

- What works well in relation to delivery of planning services in the relevant National Park/AONB.

- Any aspects that do not work so well.

- Whether there are any barriers to the effective delivery of planning services in the relevant National Park/AONB.

- Any changes that would help to improve delivery of planning services in the relevant National Park/AONB.

2.29   Interviews were able to be conducted with the Chairs of the Planning Committee in all of the NPAs and most of the LPAs (all except Monmouthshire and Anglesey Councils who did not respond to requests for interviews) and the information received fed into various parts of the evaluation/assessment framework depending on the views of and issues raised by each Member.

Interviews with Affordable Housing Officers

2.30   Telephone interviews were conducted with an officer responsible for the delivery of affordable housing in each constituent authority of the National Parks and AONBs, in order to establish the effect (if any) that the presence of the National Park or AONB designation within the authorities has on the delivery of affordable housing in those areas.

2.31   Interviews were conducted with Affordable Housing officers within each of the National Park's and AONB's constituent local authorities, excluding those that only cover a small part of the Brecon Beacons National Park. Therefore, the authorities that were interviewed were the same as those listed above under 'Interviews with Heads of Planning'. In addition, the affordable housing officer from Gwynedd Council was asked about Snowdonia National Park as well as Llŷn AONB.

2.32   These interviews sought to obtain the officers' views on whether the relevant National Park or AONB designation affects the delivery of affordable housing in those parts of the authority, and to identify any barriers that exist to the delivery of affordable housing in the National Park or AONB.

2.33   Officers from the constituent authorities of the National Parks were also asked:

- Whether the relevant National Park Authority seems to be engaged with the need for affordable housing.

- What mechanisms are in place in order to facilitate co-working between the local authority and the relevant National Park Authority in relation to affordable housing proposals.

- Whether the officers' views are taken on board by the relevant National Park Authority when making planning decisions regarding affordable housing proposals.

2.34   Officers from the authorities with AONBs in their boundaries were asked:

- Whether it is easier for affordable housing developments to get planning permission outside of the AONB (where relevant) than inside it.

- Whether there is any co-working between housing officers and AONB staff.

2.35   These telephone interviews did not address specific questions from the evaluation/assessment framework; rather they sought to gather evidence from the perspective of affordable housing officers, which would inform the overall conclusions of this report.

2.36   Interviews were able to be conducted with affordable housing officers in all relevant authorities except Anglesey Council who did not respond to requests for interviews.

Interviews with Heads of Economic Development/Regeneration

2.37   Telephone interviews were arranged and conducted with the Head of Economic Development/Regeneration (or equivalent) at each of the constituent local authorities of the National Parks and AONBs (as listed above under 'Interviews with Heads of Planning'). The aim of these interviews was to establish how the presence of the relevant National Park or AONB designation affects the delivery of regeneration initiatives in each authority, and to gather feedback about the constituent authorities' experience of dealing with the planning system in the context of economic development and regeneration, within and outside the statutory designated landscapes.

2.38   Participants in the interviews were asked about any regeneration initiatives in their authorities that are specifically tailored towards the relevant National Park or AONB, and any involvement

that they have had with the planning system. Discussions also focussed on the perceived approach of the NPAs (where relevant) towards economic development and regeneration issues in their areas, and on the relationship between the NPAs and the constituent authorities in relation to the delivery of economic development and regeneration issues i.e. whether advice from economic development officers is sought and taken on board in relation to relevant planning applications.

2.39 Interviews were able to be conducted with all of the relevant authorities except Anglesey, Conwy, Carmarthenshire, Monmouthshire and Denbighshire Councils.

Interviews with Stakeholders

2.40 In addition to the telephone interviews with Council officer and Members described above, interviews were also conducted with representatives from the following key stakeholder groups:

- Environmental groups (both national and local level)

- 'Friends' and other community groups specific to the designated landscapes.

- Community councils.

- Business groups.

- Individual planning applicants.

2.41 These interviews aimed to cover the whole range of planning services (i.e. development plan production, development management and enforcement) where relevant, and sought to obtain the stakeholder's views on:

- What works well in relation to the delivery of planning services (including examples of good practice).

- Any measures that have already been undertaken to improve service delivery.

- What does not work so well.

- What barriers exist to effective delivery of planning services.

- Any improvements they consider would help to improve delivery of planning services within statutory designated landscapes.

2.42 When selecting the stakeholders to interview, the aim was to include a fairly even range of representatives from the groups identified above, across the full geographical spread of the National Parks and AONBs, while also keeping the total number of interviews to a manageable level. Inevitably, a significant proportion of those organisations and individuals that were contacted either did not respond to repeated attempts to make contact or declined to be involved in the study. It is recognised that in some cases, this may be attributable to a lack of resources within small, volunteer-run organisations. In the end, a total of 16 interviews were able to be completed.

2.43 These interviews included local community/environmental groups for all of the National Parks and for one of the AONBs, representatives from Community Councils in two of the National Parks, and various national-level organisations. An individual applicant who submitted one of the planning application case studies in each landscape (see task described below) was also contacted, in order to obtain feedback regarding their views and experiences of dealing with the planning system, although due to a low response rate it was only possible to secure telephone interviews with three individual applicants. The interviews that were conducted included:

- Four local environmental groups - the Snowdonia Society, Friends of Pembrokeshire Coast National Park, the Brecon Beacons Park Society and the Gower Society.

- Three national environmental groups - the National Trust, the National Association of AONBs and the Campaign for the Protection of Rural Wales (CPRW).

- Four national groups representing industry – the Country Land and Business Association (CLA), National Farmers Union Wales, the Farmers' Union Wales and the Federation of Small Businesses.

- Two community councils, one each from within Snowdonia and Pembrokeshire Coast National Parks.

- Three individual applicants, one each from within Pembrokeshire Coast National Park, Wye Valley AONB and Llŷn AONB.

Reviewing Example Planning Applications

2.44   In order to complete Part D of the assessment/evaluation framework, which relates to specific examples of planning applications and how they have been processed, a sample of planning application case studies was reviewed. Two case studies were selected from within each National Park and from each LPA area within each AONB. The one exception was Anglesey, which was not included in the sample as the Council had declined opportunities to participate in the study prior to this point.

2.45   The NPAs and LPAs supplied a long list of planning applications that they had received between 2008 and 2009 for proposed developments within the relevant National Park or AONB. We are very grateful for the assistance provided in this matter, as in a number of cases the generation of these lists had to be undertaken by hand because the planning register could not be sorted by applications falling within the AONBs. The case studies were selected on a semi-random basis. The lists of applications were reviewed to ensure that all stages of the planning application process were covered and that a range of different types of application (e.g. household, minerals and waste, recreation and tourism, renewable energy, commercial, community facilities (hospitals, schools etc.) agricultural developments and essential dwellings in the open countryside) were included in the sample. In order to obtain the desired spread of applications, the first appropriate example encountered from each list was used. The sample included both successful and unsuccessful applications, as well as one that had gone to appeal; however any applications that had been withdrawn before determination were omitted from the sample.

2.46   For each planning application, the documents that were available online were initially reviewed and additional documents were then obtained from the LPA where possible, including officer's reports which in most cases were not published online. In general, the documents available online included application forms, plans and drawings, design and access statements and decision notices, although this varied somewhat depending on the nature and complexity of the application in question.

2.47   The review of planning application case studies focussed on the questions coloured pink in Part D of the evaluation/assessment framework and aimed to establish the prominence given to the landscape designations when determining different types of application, and to identify any ways in which the designation affects how applications are processed and determined.

Individual Applicants' Questionnaire

2.48   Because of the small number of telephone interviews that were able to be conducted with individual planning applicants (see above), a questionnaire was subsequently sent out to 240 individuals and organisations who had submitted planning applications within the National Parks and AONBs. These were selected from the long lists of planning applications (lodged in 2008 – 2009) that had been supplied by the relevant planning authorities. Each list was ordered by date, and the first 30 applications from 1st January 2009 onwards were selected. Only those applications for full permission were included in the sample, and any that had been withdrawn before determination were omitted. The purpose of this questionnaire was to gather more comprehensive evidence on the views of applicants on the operation of the planning process within the National Parks and AONBs,

2.49   The questions included in the questionnaire were agreed with Welsh Government (see **Appendix 2** for the questionnaire). A stamped return envelope was sent out with each questionnaire, along with a covering letter explaining the purpose of the study and why the applicant was being contacted. Respondents were given a deadline of four weeks in which to return the questionnaires. In total 49 completed questionnaires were received, which represented 20.4% of the total number (240) sent out. Seventeen completed questionnaires were received from respondents in National Parks and 32 from respondents in AONBs. The response rate from applicants in AONBs (21.3%) was slightly higher than that in the National Parks (18.9%) **Table**

2.1 below presents the number of completed questionnaires received within each planning authority.

Table 2.1: Questionnaires Completed and Returned by Individual Applicants

Planning Authority	Number of Questionnaires Received	Percentage of the 30 Applicants in each NPA or AONB that Responded to Questionnaires
Brecon Beacons NPA	7	23.3%
Snowdonia NPA	6	20%
Pembrokeshire Coast NPA	4	13.3%
Denbighshire (Clwydian Range and Dee Valley AONB)	8	26.7%
Flintshire (Clwydian Range and Dee Valley AONB)	2	6.6%
Swansea (the Gower AONB)	8	26.7%
Gwynedd (Llŷn AONB)	7	23.3%
Monmouthshire (Wye Valley AONB)	7	23.3%
TOTAL	**49**	**20.4%**
Number received from within National Parks	*17*	*18.9%*
Number received from within AONBs	*32*	*21.3%*

Community Councils' Questionnaire

2.50   In parallel to the above, a questionnaire was sent out to Community Councils lying wholly or largely within either a National Park or AONB. Again, the purpose was to gather more comprehensive evidence on the opinions of the Community Councils, as only a small number were able to be contacted as part of the stakeholder interviews (see above).

2.51   A list of all the Community Councils lying largely or wholly within either a National Park or an AONB was produced using GIS analysis (which was undertaken internally by Welsh Government), with the questionnaire sent to the clerk of each council. A total of 185 Community Councils were sent questionnaires.

2.52   Again, the questions were agreed with Welsh Government (see **Appendix 3** for the questionnaire). A stamped return envelope was sent out with each questionnaire, along with a covering letter explaining the purpose of the study and why the Community Council was being contacted. Respondents were given a deadline of four weeks in which to return the questionnaires. A total of 28 completed questionnaires were received by the deadline, with a further 17 arriving subsequently, giving an overall total of 45 completed questionnaires. From the total received, 28 were from respondents in National Parks and 17 from respondents in AONBs. **Table 2.2** below presents the number of completed questionnaires received from Community Councils within each planning authority.

Table 2.2: Questionnaires Completed and Returned by Community Councils

Planning Authority	Number of Questionnaires Sent Out	Number of Completed Questionnaires Received	Percentage of Community Councils that Responded to Questionnaires sent out in each NPA or AONB
Brecon Beacons NPA	38	9	23.6%
Snowdonia NPA	52	6	11.5%
Pembrokeshire Coast NPA	47	13	27.7%
Denbighshire (Clwydian Range and Dee Valley AONB)	12	5	41.7%
Flintshire (Clwydian Range and Dee Valley AONB)	7	1	14.3%
Swansea (the Gower AONB)	12	5	41.7%
Gwynedd (Llŷn AONB)	10	1	10%
Monmouthshire (Wye Valley AONB)	7	5	71.4%
TOTAL	**185**	**45**	**24.3%**
National Parks	*137*	*28*	*20.4%*
AONBs	*48*	*17*	*35.4%*

Review of other Relevant Research Studies and Monitoring Indicators

2.53   Prior to this current study, there have been a number of studies that have reviewed and evaluated the planning services within Wales, including the National Parks. These have been reviewed and where relevant, comparison has been made between those and the data collected through this study. These have included:

- 2008-9 the Federation of Small Businesses (FSB) that commissioned the School of City and Regional Planning, Cardiff University to conduct research into the relationship between small and medium enterprises and the planning system in Wales. Two reports were published under the main title 'Small Businesses and the Planning System in Wales': the first in October 2008, 'Stage 1: Small businesses' costs and experiences of applying for planning permission and related consents' covered the first two aims of the project; and the second published in May 2009, 'Review of National and Local Planning Policies' which focused on the planning policy context and related planning procedures that impact on small businesses in Wales. *Information in these two FSB reports has been referred to where relevant in the findings of this report under Part B: Plan Policies and Part C: Development Management Process, as well as in Chapter 5.*

- 2009, 'A Review of the Planning Services of each of the three Parks in Wales' by the Wales Audit Office. The resultant reports included recommendations for improvements specific to

each Park. They also included a common recommendation for all three Parks, that "within the next 12 months the Authorities should work in partnership with other suitably qualified authorities to develop robust comparative data and use this to demonstrate that they are providing value for money". *Note that this 2009 report has not been referred to specifically, as the PricewaterhouseCoopers report in 2011 (summarised below) was commissioned as a result of this conclusion by the Wales Audit Office, and therefore includes some useful data that has been referred to where relevant.*

- June 2010 the Welsh Assembly Government (WAG) published its report on the 'Planning Application Process in Wales' by GVA Grimley. This highlighted a number of key issues and recognised the significant variation between Local Planning Authorities (LPAs) in Wales (including the NPAs) in terms of resources, workloads and process. *This GVA Grimley report has been referred to where relevant within the findings relating to Part C: Development Management Process.*

- February 2011 publication of a 'Review of the Welsh National Park Authorities' Planning Services' by PricewaterhouseCoopers (PWC). This review was commissioned by the three National Parks in Wales to address the specific recommendation of the Wales Audit Office in 2009 and to assess whether the planning services of all three NPAs in Wales currently provide Value for Money. The review provides robust performance comparative data for the development of benchmarking between the three NPAs and other relevant and appropriate LPAs in the UK; and a comprehensive value for money study of the three Parks in Wales, comparing the three NPAs and other relevant and appropriate LPAs in the UK. The PricewaterhouseCoopers review of NPAs sought to identify what a successful planning service looked like, and then develop a framework (in conjunction with the NPAs) of comparable data sets and success criteria against which the NPAs could measure performance and on-going improvement. *Relevant elements from the PricewaterhouseCoopers framework were incorporated into the Assessment Framework used in this current study (see Figure 2.1), and where relevant, findings have been referred to within Part C: Development Management Process.*

- In June 2011 the Welsh Government published its report on 'Planning for Sustainable Economic Renewal' by Roger Tym & Partners. This study carried forward one of recommendations from the 2010 GVA Grimley study that the Welsh Government should produce a new policy statement on the importance of economic development. It evaluated how well the planning system in Wales serves national economic development objectives, and also scoped out new national planning policy and guidance to ensure local planning policies and decisions support these economic objectives more effectively. *Relevant findings from the Roger Tym & Partners study have been referred to within Chapter 5.*

Relevant monitoring indicators reviewed
National Performance Indicators

2.54 In 2010, the Welsh Government passed responsibility for the majority of local government performance measurement activities to the Welsh Local Government Association (WLGA) on behalf of local government in Wales. The Local Government Data Unit website provides a source of information relating to a wide range of statistics and indicators for different areas in Wales, including the national performance indicator datasets. Specifically, the data is held on InfoBaseCymru[8].

2.55 Initially, for 2011-12, the set will consist of indicators drawn from the 2010-11 Performance Measurement Framework. Work with local authority services during 2011-12 will re-shape the dataset to ensure that it meets the needs of the service and its regulators. While work on evaluating and revising the performance measurement framework continues, the 2010-11 performance indicators are set out in National Performance Indicator Guidance for Wales 2010-11[9]. Data are provided for each indicator back to 2006-2007. The 2010-11 national performance indicators include a set of indicators relating to planning service delivery, including:

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[8] http://www.infobasecymru.net/IAS/eng
[9] Local Government Data Unit (undated) National Performance Indicator Guidance for Wales 2010-11. Version 3.

- Indicator PLA/002 - the percentage of applications for development determined during the year that were approved.

- Indicator PLA/003 - the percentage of planning application & enforcement notice appeals upheld.

- Indicator PLA/004a - the percentage of major planning applications determined in 13 weeks.

- Indicator PLA/004b - the percentage of minor planning applications determined in 8 weeks.

- Indicator PLA/004c - the percentage of householder planning applications determined in 8 weeks.

- Indicator PLA/004d - the percentage of other planning applications determined in 8 weeks.

- Indicator PLA/004e - the percentage of Environmental Impact Assessments determined in 16 weeks.

- Indicator PLA/005 - the percentage of enforcement cases resolved in 12 weeks.

- Indicator PLA/007 - the percentage of additional housing units on previously developed land.

2.56   Data for each of these indicators are provided for the financial year 2010-11 for each of the Welsh LPAs (except for the National Park Planning Authorities) on the InfoBaseCymru website. Some of these datasets have been referred to where relevant in the findings of this report under Part B: Plan Policies, Part C: Development Management Process and Part E: Enforcement.

Development Control Quarterly Survey

2.57   In addition to the national performance indicators for planning services, the Welsh Government collects information such as speed of determining planning applications and the planning application workload from local planning authorities on a quarterly basis. The results are published on Welsh Government's website[10], and the latest quarterly survey (January to March 2012) has been referred to where relevant in the findings of this report under Part C: Development Management Process.

Stakeholder workshops

2.58   At the end of Phase 2, following production of the Phase 2 Report, LUC facilitated two stakeholder workshops hosted by the Welsh Government (one in north Wales and one in south Wales). The purpose of the workshops was to encourage discussion between stakeholders and to help test emerging conclusions and recommendations plus examples of best practice (as well as obtain more examples of best practice). Stakeholders were invited from the following groups (a) NPA planners and planners of the constituent local authorities of the National Parks and AONBs, (b) housing and economic development officers of the constituent authorities of National Parks and AONBs, (c) AONB officers, as well as (d) representatives of national and local environmental and business organisations. Representatives from the Welsh Government Planning Division also attended both workshops and gave a brief introduction to the wider review of the planning system currently being undertaken by Welsh Government as part of the new Planning Bill.

2.59   The north Wales workshop was held on 26th July 2012 in Llandudno and was attended by 18 stakeholders representing:

- Campaign for the Protection of Rural Wales

- Clwydian Range and Dee Valley AONB

- Countryside Council for Wales

- Denbighshire County Council

- Environment Agency Wales

- Flintshire County Council

- Gwynedd County Council

- Isle of Anglesey County Council

- Llŷn AONB

- National Farmers Union Wales

- Snowdonia NPA

- The Snowdonia Society

- Welsh Government

2.60   The south Wales workshop was held on 27th July 2012 in Merthyr Tydfil and was attended by 23 stakeholders representing:

- Brecon Beacons NPA

- Brecon Beacons Park Society

- Carmarthenshire County Council

- City and County of Swansea

- Countryside Council for Wales

- Environment Agency Wales

- Federation of Small Businesses

- Gower AONB

- Gower Society

- Pembrokeshire Coast NPA

- Pembrokeshire County Council

- Powys County Council

- Welsh Government

- Wye Valley AONB

2.61   Prior to the workshops, all invitees were sent a summary of the Phase 2 Report, so that they could consider the findings and emerging conclusions/examples of best practice. At both workshops, stakeholders were asked initially to discuss what they thought were the barriers to effective delivery of planning services in the National Parks and AONBs, and subsequently to discuss potential solutions to overcome any barriers identified.

2.62   Therefore, the conclusions and recommendations set out in Chapters 5 and 6 of this report draw on the findings of Phases 1 and 2, plus the outcomes of the discussions held at these two stakeholder workshops.

3 Key findings from Phase 1: Models for delivery of planning services in statutory designated landscapes

3.1 The different models of delivering planning services within statutory designated landscapes within Wales, England and Scotland are summarised below, with reference to any useful approaches that may be relevant to the Welsh NPAs and AONBs.

National Park Authorities with full planning powers

3.2 All National Park Authorities (NPAs), with the exception of the Cairngorms National Park in Scotland and the recently created South Downs National Park in England, are the statutory local planning authority (LPA) for land within their boundary, responsible for all aspects of planning, including all development management, with their own local development plans framing their planning policy. Therefore, all three of the Welsh NPAs follow this model. A key difference between the Welsh models and their English and Scottish counterparts is in relation to their governance and Member representation, as described below.

Governance and Member representation

3.3 Under the Environment Act 1995, the Welsh NPAs are single purpose authorities with one-third of their members appointed by the Welsh Government and two-thirds being councillors nominated by the constituent local authorities of the National Park area. In this way the NPAs aim to represent both national and local interests. Schedule 7 to the 1995 Act provides that the number of local authority members must exceed the number of other members. Schedule 2 to the National Park Authorities (Wales) Order 1995 specifies the actual number of members in each National Park Authority in Wales.

3.4 Brecon Beacons NPA has the most members out of the Welsh NPAs at 24, while Pembrokeshire Coast and Snowdonia NPA have 18 members each, although their composition is slightly different due to the number of constituent local authorities, as shown in **Table 3.1**. The members appointed by Welsh Government are appointed through a recruitment process and have experience or specialist knowledge of a particular area, such as environment, tourism, farming or community work.

Table 3.1: Member representation in the three Welsh NPAs

Member composition	Brecon Beacons	Pembrokeshire Coast	Snowdonia
No. appointed from **constituent local authorities**	16 (8 from Powys, 2 each from Monmouthshire and Carmarthenshire, 1 each from Merthyr Tydfil, Torfaen, Blaenau Gwent and Rhondda Cynon Taff)	12 (from Pembrokeshire County)	9 (from Gwynedd) 3 (from Conwy)
No. appointed by **Welsh Government**	8	6	6
Total number of Members	**24**	**18**	**18**

3.5   In the Scottish and English NPAs, Member representation currently includes more local
        representation than in Wales (see **Table 3.2**).

Table 3.2: Member representation in Scottish and English NPAs[11] with full planning powers

Member composition	Loch Lommond and the Trossachs[12]	English NPAs (Dartmoor, Exmoor, Lake District, New Forest, North York Moors, Yorkshire Dales)	English NPAs (Northumberland)*	English NPAs (Peak District)**
No. appointed from **constituent local authorities**	6	12	6	16
No. appointed by **national Government** / Secretary of State following assessment of applicants	6	6	10	8
No. appointed by **direct local elections**	5	n/a	n/a	n/a
No. appointed by National Government / Secretary of State from **constituent Parish Councils**	n/a	4	6	6
Total number of Members	**17**	**22**	**22**	**30**

* Northumberland membership reflects the fact that it lies within a single unitary authority. This structure
avoids a single local authority appointing an excessive proportion of members.

** Peak District membership reflects the fact that it extends into 11 local authority areas.

3.6   Under the existing **English** framework, as in Wales, there is a split between national appointees
        and local authority nominees but there is a requirement that a proportion of the national
        appointees are parish council members (equivalent to community council members in Wales). It
        is a requirement that the combined number of local authority and parish members must
        outnumber the 'national' members. It is important to note that the selection of parish council

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[11] From: Defra (November 2011) Consultation on the Governance arrangements for National Parks and the Broads.

[12] From: http://www.lochlomond-trossachs.org/looking-after/national-park-authority-board/menu-id-403.html

members in English National Parks does not involve public voting. Parish members are chosen by the parishes collectively (though formally appointed by the Secretary of State) and in accordance with Schedule 7 to the Environment Act 1995, must be serving councillors of a parish council with land in the Park or, where there is no parish council, the chair of the parish meeting for a parish with land wholly or partly in the Park. It is therefore not a form of direct local election but it does seek to gain significantly greater local representation.

3.7   Defra has been undertaking a review of the governance arrangements of National Parks in order to increase local accountability, and carried out a public consultation on this issue between November 2010 and February 2011[13]. . Defra published a further consultation document in March 2012[14], with a closing date of 31st May 2012 inviting comments on the proposed changes to primary legislation which the Government is minded to make through a Public Bodies Act Order. The proposed changes reflected the themes arising from the public consultation and included making it possible for National Park Authorities to include some directly elected members and relaxing the political balance requirement on local authorities when appointing their members to a National Park Authority. However, the results of that consultation are not yet available.

3.8   In **Scotland**, following the requirements of the National Parks (Scotland) Act 2000 at least 20% of the governing board of each Park Authority are directly elected (by postal ballot) by people who are on the electoral role for the Park area. Of the remainder, local authorities and Scottish Ministers will each nominate 50% who are then appointed by Scottish Ministers. The Act places an upper limit on the size of the Board of the Park Authority at 25, with a guarantee that at least 20% of the Board's appointed membership will be people who live in the area, or who are its ward or community councillors.

3.9   In Scotland a Park Authority is also required to establish one or more advisory groups to involve key interests and organisations in the management of the area. To this end, Loch Lomond and the Trossachs NPA also convenes a Planning Forum, which consists of around 30 people from a variety of backgrounds and interests, including property development, renewable energy, tourism and affordable housing, Community Councils and other organisations such RSPB Scotland, the Scottish Council for National Parks and a Housing Association are also represented. The Planning Forum meets to share views and experiences of the Planning Service and discuss ideas for its improvement.

3.10   In **Wales** in 2006, the Welsh Assembly Government consulted on the potential for direct elections to the National Park Authorities but the majority of respondents were opposed to this proposal and therefore it has not been progressed..

Function of Planning Committees

3.11   All three Welsh NPAs have specific planning committees, which comprise all of the NPA members in each National Park. However, Snowdonia's Planning and Access Committee and Brecon Beacons' Planning, Access and Rights of Way Committee deal with both forward planning and development management issues together, while Pembrokeshire Coast's full NPA Board deals with forward planning but has separate sessions for the Development Management Committee to determine planning applications (although both committees still include all Members).

Size of planning teams in NPAs with full planning powers

3.12   Brecon Beacons NPA has the largest planning team of all the Welsh National Parks employing around 30 planning staff, while Snowdonia and Pembrokeshire Coast NPAs have in the region of 20-25 planning staff. These planning teams cover all aspects of forward planning, development management and enforcement.

Availability of landscape specialists

3.13   All three Welsh NPAs have a wide range of in-house specialists that inform the planning team, however, none of them have an in-house landscape architect. All use consultancies and call off contracts for specialist advice that is not held in-house, including landscape specialists.

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[13] Defra (November 2011) Consultation on the Governance arrangements for National Parks and the Broads.

[14] Defra (March 2012) Consultation on changes to National Park governance.

Relationship with constituent local authorities

3.14   Both formal mechanisms for joint working and informal mechanisms and relationships are important components of how the NPAs work with their constituent local authorities. The level of contact and collaboration between the NPAs and their different constituent authorities or the teams within their constituent authorities varies in response to issues that come up and the need to work together on specific aspects. This applies to all the Welsh NPAs whether they have seven constituent authorities, as with Brecon Beacons, or just one, as with Pembrokeshire Coast.

3.15   All NPAs have entered into formal arrangements to share resources / expertise on several issues:

- Pembrokeshire Coast NPA shares a minerals planning applications officer with Carmarthenshire County (not a constituent LPA) and the NPA sits on the Minerals Liaison Group for the wider area. There are also very strong relationships with Pembrokeshire County Council with a joint affordable housing enabler, close working on housing delivery, highways, and tourism and economic development.

- Likewise Brecon Beacons NPA has a service level agreement with Carmarthenshire for the delivery of minerals planning services and also undertakes some of Powys County Council's planning function on their behalf in the vicinity of the National Park. The NPA, amongst other things, is also heavily involved in regeneration partnerships located along their southern boundary.

- Snowdonia NPA jointly funds rural housing enablers with their two constituent local authorities, Gwynedd and Conwy, and forms part of a consortium of north Wales LPAs that has set up a joint minerals planning unit in Flintshire to deliver minerals planning on their behalf. The Chief Executive and Director of Planning of Snowdonia NPA lead and sit on a number of Boards including Gwynedd Council's Local Service Board, Gwynedd Housing Partnership, Green Economy for the Conwy County Borough Council Local Service Board and the North Wales Economic Forum

National Park Authorities with shared planning powers

3.16   Both the Cairngorms National Park in north east Scotland and the South Downs National Park in south east England are relatively recent National Parks. The Cairngorms National Park was designated in 2003 under the National Park (Scotland) Act 2000 and the South Downs in 2010 under the National Parks and Access to the Countryside Act 1949 as amended by the Environment Act 1995. Both NPAs are responsible for forward planning, but share the responsibility for determining planning applications with their constituent LPAs. In the case of the Cairngorms the five constituent authorities remain the planning authorities[15] while in the South Downs the NPA is the statutory planning authority but each of the 15 local authorities, whose boundaries fall partially within the National Park, provide the majority of the planning service on behalf of the SDNPA under a legal agreement, signed between each local authority and the SDNPA.

Forward planning

3.17   In the Cairngorms the first Local Plan, prepared by the NPA, was published in October 2010 marking a transition to a common policy framework across the Park, and a new Local Development Plan is in preparation which will cover the whole of the National Park area including the new extension (the Perth and Kinross extension confirmed in 2010).

3.18   In the South Downs, the NPA is preparing the first Local Plan for the National Park area which will be formally submitted to the Secretary of State in June 2015 and be adopted by June 2016. In addition, five Core Strategies are being prepared jointly by the NPA and five of the constituent authorities that have a significant population and/or land area within the National Park[16].

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[15] In Scotland each National Park is brought into being by Designation Orders, which set out the area designated as the National Park and the details of how the authority is to be established, including specific functions and powers. This mechanism allows for the tailoring of individual Authorities to the particular requirements of a Park.
[16] South Downs National Park Local Development Scheme (August 2012)
http://www.southdowns.gov.uk/__data/assets/pdf_file/0005/263048/Final-LDS-1st-revision-August-2012.pdf

Development management

3.19 The Cairngorms and South Downs National Parks have a very similar approach to development management. Smaller planning applications and those within the established larger settlements of the National Parks are determined by the constituent LPAs, but with the NPAs able to call in and determine more significant applications that may conflict with the purposes of the National Park. In both cases it is the Planning Committee that decides whether an application should be called in, although in the case of the South Downs a scheme of delegation is currently being drawn up.

Governance and Member representation

3.20 The member representation and composition in the Cairngorms and South Downs NPA follows the Scottish and English legislative requirements described above, and is shown in **Table 3.3** below.

Table 3.3: Member representation in the Cairngorms and South Downs NPAs (with shared planning powers)

Member composition	Cairngorms	South Downs
No. appointed from **constituent local authorities**	8	14*
No. appointed by **national Government / Secretary of State** following assessment of applicants	7	7
No. appointed by **direct local elections**	5	n/a
No. appointed by national Government / Secretary of State from **constituent Parish Councils**	n/a	6
Total number of Members	**19**	**27**

* There are 15 local authorities within the Park, and each is entitled to a seat on the Park Authority. Two councils have decided to share a seat.

Function of Planning Committees

3.21 In the Cairngorms the Planning Committee is the same as the National Park Board of 19 members. In the case of the South Downs, the Planning Committee, responsible for both forward planning and development management, has a membership of 11 drawn from the full Board of 27, with the same balance of representation as on the main Board.

Size of planning teams in NPAs with shared planning powers

3.22 Both the Cairngorms and South Downs NPAs have relatively small planning teams relative to their size: the Cairngorms has less than 10 staff while the South Downs has some 20 planning staff excluding administrative assistance[17].

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[17] It is anticipated that there will be up to 4,000 planning applications submitted within the National Park, making the SDNPA the eight biggest planning authority in England in terms of workload. As a consequence, the great majority (about 97%) of these applications are / will be dealt with by the 15 existing Local Planning Authorities

Availability of landscape specialists

3.23 The South Downs NPA has two landscape officers and an interactive landscape character assessment working to the boundaries of the Park.

Relationship with constituent local authorities

3.24 In both National Parks, informal relationships with the constituent local authorities are very important. In the South Downs it is not possible for the NPA to attend all meetings or have very rigid formal structures with 15 constituent authorities to liaise with, as the resources do not exist to support this level of activity. So in the South Downs, the Planning Working Group (to which all the chief planning officers of the constituent local authorities are invited) forms the central contact point between the NPA planning team and the constituent LPAs backed by other fora. The NPA planning teams rely on this group to find out about other issues that may affect the National Park such as economic development and affordable housing.

3.25 Prior to becoming a National Park the transitional body spent 18 months building up relationships with the constituent local authorities, the South Downs NPA feels that this hard work and investment has built very strong relationships across all of its constituent authorities.

Areas of Outstanding Natural Beauty with Conservation Boards

3.26 AONB Conservation Boards can be created under the Countryside and Rights of Way (CRoW) Act 2000. The Act allows for the creation of Boards to oversee large AONBs that overstep county boundaries and cannot easily be hosted by one local authority. Currently there are two AONBs in England that have Conservation Boards – the Chilterns and the Cotswolds AONBs, having been pioneered by the Sussex Downs AONB Conservation Board, now forming part of the South Downs National Park.

3.27 As set out in the CRoW Act, the main aims of a Conservation Board are:

- To conserve and enhance the natural beauty of the AONB.

- To increase understanding and enjoyment of the special qualities of the AONB, ensuring that these complement the conservation and enhancement of the area.

3.28 All statutory planning functions remain with the constituent local authorities. However, the Chilterns and Cotswolds AONB Boards are generally consulted by the constituent local authorities early in the plan preparation process, although in a few cases in the Chilterns there has been no early consultation, requiring the AONB planning officer to attend the Examination in Public of the relevant development plan. In both the AONBs the planning officers are trying to ensure that each development plan has a policy or reference to the "need to conserve and enhance the natural beauty of the AONB" and to ensure that there is reference to the AONB Management Plan (in the Chilterns less than half of the constituent local authorities have formally endorsed the statutory Management Plan compared to 13 out of 15 in the Cotswolds). Reflecting the above, the Cotswolds feel that there is general policy consistency in the treatment of the AONB in the development plans of the constituent local authorities while this is less the case in the Chilterns.

3.29 In terms of development management, overall, the Cotswolds Board identifies some 2,500 applications per year for consideration but only makes substantive comments on about 25-30 per year out of a total of some10,000 applications in the AONB, whereas the Chilterns review some 160 applications per year out of a total of some 2,500 applications.

3.30 In both cases the planning officers review the weekly lists of applications by local authority. Only major /significant and controversial applications are reviewed by the relevant Planning Committees (see below). The Planning Committees will also comment on significant applications beyond the boundaries of the AONBs that may affect the AONB setting.

Governance and Member representation

3.31 Conservation Boards are made up of Secretary of State appointees, representatives of the constituent local authorities and representatives of parish councils, totalling some 35 members.

All members take part in key decisions concerning the AONB. The Chilterns AONB has 13 constituent local authorities and the Cotswolds 15.

Function of Planning Committees

3.32 Both the Chilterns and the Cotswolds Conservation Boards have a specific Committee charged with planning matters – the Planning Committee in the case of the Chilterns and the Living and Working Sub-Committee in the case of the Cotswolds. Both have 8-9 members with representation proportional to that on the full Board (i.e. Secretary of State appointees and LPA and Parish Council representatives). In the case of the Chilterns there are also up to four co-opted members that bring specific expertise to the Board: these include the ex-director of planning at Chilterns District Council, a local architect, a planning advisor from the National Trust, and a representative from the Friends of the Chilterns Society (now lapsed). In both cases the Committees meet four times a year.

3.33 The principal function of the Chilterns Planning Committee is to 'make all representations on behalf of the Board in relation to planning policy and planning applications' while that of the Cotswolds Living and Working Committee is to 'provide a forum for debate and sharing of best practice on planning, transportation and development issues and developing specific advice for the Board, local authorities and others on common approaches, policies and guidelines'.

3.34 As the Committees only meet four times a year, the planning officer in the Chilterns has delegated powers to make representations on individual planning applications on behalf of the Board. On the other hand, in the Cotswolds, the Living and Working Sub-committee has delegated powers from the Executive Committee to make responses on planning applications and Local Planning Documents to the relevant LPAs on behalf of the Board. The Cotswolds' planning officer will draft a response on a planning application (or planning document) and emails this to the Planning Sub-committee members. The planning officer then amends the response in the light of any comments received from Sub-committee members and submits the final response on behalf of the Conservation Board. It is only the more complex applications that tend to go to the formal meetings of the Living and Working Sub-committee, where they will debate the application more formally and decide what response to make on behalf of the Conservation Board.

Location and composition of planning/AONB team

3.35 Both the Chilterns and Cotswolds Conservation Boards have a planning officer located at the Conservation Board Offices (which are entirely separate to those of any of the constituent local authorities). They have lead responsibility for all aspects relating to planning, both forward planning and development management.

Relationship with constituent local authorities

3.36 Both Boards have a planning protocol setting out the roles and responsibilities of the constituent LPAs with reference to the AONB designation. (In England a number of other AONBs without a Conservation Board also have such planning protocols, such as the Kent Downs AONB.) Equally, both AONBs have a Planning Working Group / Forum that meets every six months and to which planning officers of all the constituent LPAs are invited, although many do not attend.

3.37 Relationships between the planning officers and the constituent LPAs vary and work well where there is a strong working relationship between the relevant officers but tend to be weak where only a small part of the LPA area lies within the AONB. Nevertheless, overall, relationships are considered to be good, especially with those authorities covering significant parts of the AONBs.

Areas of Outstanding Natural Beauty with Joint Advisory Committees

3.38 All AONBs without Conservation Boards are managed by a partnership of their constituent local authorities and other public and voluntary bodies with an interest in the land area they cover – usually known as Joint Advisory Committees (JACs). The five AONBs in Wales (Gower, Anglesey, Llŷn, Wye Valley and Clwydian Range and Dee Valley) follow this model, and cover nine different

local planning authorities (seven in Wales, and two in England: Herefordshire County and Forest of Dean District – see **Table 1.1**).

3.39   JACs are able to consider any planning applications relating to land within their AONB area, and make representations to the relevant constituent planning authorities if they wish.

Governance and Member representation

3.40   All of the AONBs in Wales have a Joint Advisory Committee (JAC). The JACs comprise representatives from the constituent LPAs and a number of other relevant local stakeholders including community councils as shown in **Table 3.4** below.

Table 3.4: Composition of AONB Joint Advisory Committees and staff teams

AONB	Staff structure and location	AONB Partnership / JAC structure
Llŷn	2 AONB posts held by 3 staff based at Gwynedd Council (AONB Officer and Projects Officer).	JAC (est 1997) comprising representatives as follows: • 10 community councils which form the AONB • 5 Gwynedd Councillors • 2 farming Unions • CCW • EA • CPRW • Cyfeillion Llŷn • Local Tourism Association • Local Fishermen's Association • National Trust • Local Access Forum
Gower	3 AONB staff based at the Planning Services division of City & County of Swansea Council (Team Leader, Assistant AONB Officer and Ranger)	AONB Partnership (established January 2011); replaces the previous Gower Countryside Forum. 18 members comprising representatives of Swansea Council, the Countryside Council for Wales and other partnership organisations (elected at the Partnership's annual forum).
Clwydian Range and Dee Valley	AONB activities managed by the Denbighshire Countryside Services. All staff located at Loggerhead's country park (AONB Officer, Senior Countryside Officer, AONB Planning Officer (part-time), AONB wardens, and community warden). AONB team is specifically dedicated to the AONB but also have a responsibility for the wider countryside of Denbighshire.	JAC comprising representatives of the two local Authorities, landowners, farmers, and conservation and recreation interests. It is supported by an Officer's Working Group of relevant officers from the constituent local authorities, CCW and the Agriculture and Rural Affairs Dept., WAG. The JAC includes a Consultation sub-committee responsible for some planning (major applications) and other consultations (e.g. NATS consultation). It meets about 6 times a year).
Anglesey	6 AONB staff based at the Planning Service of Isle of Anglesey County Council.	JAC comprising representatives of a number of organisations: CCW, FCW, EA, CPRW, RSPB, NWWT, GAT, Menter Môn,

AONB	Staff structure and location	AONB Partnership / JAC structure
	(Countryside and AONB Officer, AONB Project Officer, AONB Community Warden x2, Countryside Warden x2).	Medrwn Môn, NFU, FUW, Coed Cymru, FSB, GeoMôn, Welsh Government, Ramblers, Unllais Cymru, Anglesey Tourism Association, School of Ocean Sciences, CLA, County Councillors and Officers of the County Council.
Wye Valley	5 AONB staff based in their own offices in Monmouth. (AONB Lead Officer, Development Officer, Information Officer, Community Links Officer, Finance/Admin).	AONB Partnership comprising a JAC and a Technical Officers Working Party (TOWP). **JAC comprises**: 2 councillors each from Forest of Dean District and Gloucestershire County Councils; 4 councillors each from Herefordshire Council and Monmouthshire County Council. Also a representative from Council for the Gloucestershire Countryside, Gwent Committee for the Environment, CPRE, CLA & NFU plus up to 5 non-voting members from local organisations. **TOWP comprises:** representatives of the 4 local authorities and government agencies, e.g. CADW, NE, FC, Sports Council.

Function of Planning Committees

3.41   For each AONB, the AONB officers/team operates on behalf of the JAC when it comes to commenting on development plans and planning applications. All of the AONBs are given an opportunity to comment on development plan policies over and above statutory consultation procedures. AONB officers are also invited to comment on planning applications within their AONB. .

3.42   For all AONBs except Wye Valley AONB, the JAC does not comment on planning applications (usually due to concerns from local authority members who also sit on planning committees). In the Wye Valley there is a Consultation Sub-committee that comments on certain planning applications where the AONB officer thinks the potential impact on the AONB is of an extent that warrants their input.

Location and composition of AONB team

3.43   For some AONBs planning advice is available in-house to the extent that the AONB officer is a qualified planner (Gower and Anglesey); a past Development Control Officer (Llŷn); the Clwydian Range and Dee Valley has a dedicated planning officer (part-time); while Wye Valley employs a planning consultant to advise on some planning applications. In addition, the AONB teams of the Gower and Anglesey are located within the planning departments of their respective local authorities.

3.44   The number of constituent authorities of the AONB affects the structure of the AONB team as illustrated in **Table 3.4**.

3.45   Officers for all the AONBs, with the exception of the Wye Valley, are part of the planning or countryside services departments of the main constituent local planning authority (Denbighshire in the case of the Clwydian Range). In the Wye Valley the AONB Officers/Unit is a separate body, independent of the constituent local planning authority.

Availability of landscape specialists

3.46 Some of the constituent LPAs of AONBs have landscape architects in-house, such as Monmouthshire and Anglesey but the majority do not. No AONB in Wales has a Landscape Character Assessment prepared to the AONB boundary. This compares with England where all do, funded in the past by the Countryside Commission.

Relationship with constituent local authorities

3.47 The relationship between the AONB officers and the constituent LPAs varied for each AONB and often varied between the constituent LPAs in each AONB. For each AONB, the relationship is often strongest with the LPA that constitutes the majority of the AONB area. Officers indicated this was a result of more contact (as more applications come from these authorities).

3.48 Where the AONB officers are located within the constituent local authorities, relationships are good as there is frequent informal contact. However, Wye Valley officers and Clwydian Range and Dee Valley officers who are located in different premises to planning services still felt they were able to maintain frequent contact via telephone and email.

National Scenic Areas

3.49 There are 40 National Scenic Areas (NSAs) in Scotland, which are equivalent designations to AONBs in England and Wales. However, unlike AONBs all NSAs sit within a single local authority area (with some local authorities including more than one NSA).

3.50 Until 2010, the only descriptions of most of the NSAs were found in the original 1978 Countryside Commission for Scotland publication Scotland's Scenic Heritage. Therefore, the availability of a concise reference source to inform forward planning and development management within NSAs has been limited. In 2010, Scottish Natural Heritage (SNH) published an up to date list of the special qualities of each NSA having surveyed all the NSAs[18]. Therefore, a clear understanding has been developed of what makes the landscape special within each NSA and provides a consistent reference source for all local authorities containing NSAs.

3.51 Dumfries and Galloway Council has been pioneering the use of Management Strategies in its three National Scenic Areas which have been adopted as supplementary planning guidance (SPG).Dumfries and Galloway is also the only local authority to have a dedicated NSA officer, with primary responsibility for project work. The Management Strategies relate more to the delivery of conservation projects within the NSAs, rather than planning policy guidance but they have influenced planning policies within the development plans for Dumfries and Galloway.

3.52 Across all NSAs, all aspects of planning remain with their constituent authority. The only important difference for planning delivery in NSAs is that SNH must be consulted on certain categories of development, as follows:

- Schemes for five or more houses, flats or chalets except for those within towns and villages for which specific proposals have been made in an adopted local plan.

- Sites for five or more mobile dwellings or caravans.

- Erection of buildings and structures over 12 metres high.

- All non-residential developments requiring more than 0.5 hectares of land.

3.53 In addition, for development proposals that could impact on important views into or out of a National Scenic Area, applicants and planning authorities should seek the advice of Architecture and Design Scotland, as stated in Scottish Planning Policy 20.

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[18] Scottish Natural Heritage (2010). The special qualities of the National Scenic Areas. SNH Commissioned Report No.374

Themes emerging from Phase 1

3.54   From what was learnt through discussions with the NPA and AONB officers during Phase 1 of the study, two themes emerged that were considered worth exploring during Phase 2 of the study:

1   Planning to the boundary of the statutory landscape

2   Integration versus independence

3.55   These findings from Phase 1 were based on the views provided by NPA and AONB officers, and were therefore tested with other stakeholders during Phase 2.

3.56   A third theme that emerged was that of local representation which was picked up during the Phase 2 workshops. This is also discussed below.

Planning to the boundary of the statutory designated landscape

3.57   An overriding characteristic of statutory designated landscapes is that they do not follow administrative boundaries. They reflect instead the geographic extent of nationally important landscapes defined by identifiable special qualities and key landscape characteristics. These landscapes may form a part of one local authority area (as in the NSAs in Scotland, and some AONBs and National Parks in Wales). At the other extreme they may part cover a large number of local authority areas – up to 15 in some English AONBs.

3.58   Nevertheless, with the exception of the National Parks, the planning functions are delivered according to administrative boundaries.

3.59   A clear view that came through from the interviews in Phase 1 is the benefit of delivering planning services to the boundary of a statutory designated landscape. As expressed by the NPAs in Wales the key advantage of planning to national park boundaries is that NPAs can adopt a consistent approach across the whole of the National Park area in their Local Development Plan regardless of local authority boundaries. This allows clear focus to be given to the national park purposes and allows alignment with the National Park Management Plan, creating a coherent approach and a clear focus across each National Park. This is further supported by member training.

3.60   This view is reinforced by the experiences of the Cairngorms National Park Authority in Scotland where development management is achieved through a partnership of the constituent LPAs and the NPA. Here it has been the preparation of a Local Development Plan by the NPA for the total area of the National Park that has brought far greater consistency to development management across the whole area of the statutory landscape, with all planning decisions now informed by the common policy framework provided by the Local Development Plan for the National Park. As a consequence, the NPA's involvement in development management across the National Park has reduced from 13.6% of planning applications in 2006 to 9.2% of applications in 2010. Of those applications that are called-in some 70% - 80% are subsequently approved, with heavy emphasis placed on pre-application discussions.

3.61   In the Welsh AONBs, which generally fall within a limited number of local authority areas, there remains a view among the AONB officers that policy specific to the AONBs could potentially be better embedded in local plans and individual planning decisions. This is not the case for the Gower, where its long-standing designation (the Gower was the first AONB in the UK designated in 1956) has ensured that the AONB is now clearly embedded in local planning policy.

3.62   Equally in Wales no AONB-wide planning guidance or SPG has been adopted for AONBs with more than one constituent local authority. This is because it has proved challenging to agree responsibility and achieve consensus across local authority boundaries.

3.63   Nevertheless, the National Scenic Areas (NSAs) of Scotland possibly indicate mechanisms that can be used to encourage consistent planning to the boundary of statutory landscapes. These are:

- The identification and promulgation of the special qualities of each NSA to help guide planning decisions (commissioned by Scottish Natural Heritage).

- The statutory requirement that SNH is consulted on certain categories of development within NSAs that have the potential to compromise the special qualities of the designated landscape.

Integration versus Independence

3.64   **Integration:** Across all those interviewed during the first stage of this study, there is strong support for close working relationships between the NPAs and AONB officers and their constituent local authorities. However, this may be compromised:

- where, as already identified, the statutory landscape only makes up a small part of the constituent local authority; and/or

- by high levels of staff turnover and reorganisation within the constituent local authorities which makes it difficult to maintain continuity of relationship between key members of staff.

3.65   In both England and Wales these considerations are being addressed in some statutory landscapes by:

- the preparation of Planning Protocols setting out roles and responsibilities;

- the creation of AONB Planning Working Groups / Fora to which planning officers of each constituent authority are invited; and

- officer and member training.

3.66   While beneficial these are not seen as a substitute for strong working relationships, as levels of engagement will always be dictated by the perceived importance of the statutory designated landscape. In the Welsh National Parks, 'bonding' with constituent local authorities is aided by significant examples of joint working and shared support for specific roles, such as the joint funding of affordable housing enablers.

3.67   In the new South Downs National Park in England the importance of joint working has been identified from the outset. Here very considerable effort has been put into building bridges between the NPA and each constituent local authority during the formation of the NPA. This is now underlined by the creation of NPA planning liaison officers responsible for specific geographical areas of the National Park whose responsibility it is to liaise with 'their' constituent planning authorities.

3.68   In the case of both the Cairngorms and South Downs National Parks the sharing of development management activities potentially offers a more integrated and streamlined approach. Nevertheless experience in the Cairngorms suggests there can be considerable duplication of effort in the early processing of planning applications before they are called in by the NPA. This process also raises questions about responsibility for the screening process for EIAs and the subsequent provision of a scoping opinion on the content of EIAs. In addition, the Cairngorms note that they are frequently not included in pre-application discussions meaning that the NPA misses the opportunity to influence the application in ways that would allow approval.

3.69   **Independence:** Nevertheless, while strongly supporting integration with the constituent local authorities, there is recognition of the importance of statutory designated landscapes having their own clear identify, separate from that of the constituent local authority(s). This enables consistency in the delivery of planning functions across the statutory landscape.   This may be supported by:

- a single local development plan for the total area of the statutory landscape and / or supporting SPG, and other specific guidance;

- identification of the special qualities of the statutory landscape to guide planning decisions as in the NSAs in Scotland;

- planning policies specific to the designated landscape within the development plans of constituent local authorities (in the case of AONBs);

- formal endorsement of the statutory Management Plan for the statutory designated landscape by all constituent local authorities and / or adoption as SPG;

- the statutory landscape team having a clear and separate identity either within the constituent local authority or by being physically located in a separate office – as in the case of the Wye Valley AONB Unit;

- in the case of AONBs, potentially by creating a separate planning sub-committee to the JAC (as in the Wye Valley AONB) to provide member input to AONB planning decisions. It is noted

that one of the perceived constraints to this is the potentially conflicting roles of council members.

3.70 The decision of Pembrokeshire Coast NPA to revert from a joint development plan with Pembrokeshire County Council to a local plan specific to the national park area is helpful in highlighting the relative benefits of integration versus independence. On the plus side, a joint plan was seen to encourage the development of a spatial strategy that extended beyond the boundary of the statutory landscape and clearly helped co-operation and joint working between the two authorities. Nevertheless, it was also seen as compromising the emphasis on the National Park purposes and duty (leading to accusations that the Plan was not conveying the right messages for a National Park). It also lead to divisive arguments that sought to play the NPA off against the constituent authority.

Local representation

3.71 A third theme emerging from this review was the difference in local representation in the Welsh National Park Authorities, compared to other National Park models in England and Scotland and also the AONBs in Wales.

3.72 In the Welsh National Parks, National Park Authorities are made up of one-third of their members appointed by the Welsh Government and two-thirds being councillors nominated by the constituent local authorities of the National Park area. There is no specific requirement that any members are local to the Park area and, indeed, for some of the constituent authorities of the individual Parks, all or most of their nominees are currently councillors drawn from outside the local authority boundary, sometimes at some distance. One of the reasons for this geographical disparity is the need to retain a balance of political parties across the nominated councillors of each authority.

3.73 By comparison, in the English National Parks a proportion of the Authority members that are national appointees are parish council members (equivalent to community council members in Wales) while in Scotland 20% of the Authority Board members are directly elected by the population of the National Park and at least 20% of the Board members appointed by Scottish Ministers are people who live in the area, or who are its ward or community councillors; thus ensuring local community representation.

3.74 Scotland is still the only example where there is direct election of National Park Authority members. As reported in the National Parks Strategic Review Report in 2008[19] both nominations and turnout had decreased since the first elections in 2003. This has for the most part been the case again in the most recent elections in 2010 / 11 in both the Cairngorms and Loch Lommond and the Trossachs. Nevertheless, in England Defra is now consulting on introducing direct elections for a proportion of National Park members in England in line with the localism agenda. For Wales, the results of these pilots in England will allow for closer comparison and consideration with the Welsh situation, allowing further consideration of whether this is a model that could have benefits for the Welsh National Parks.

3.75 It is also interesting to note that the Joint Advisory Committees of the Welsh AONBs mostly have strong local representation (although they do not typically get involved in planning matters). They usually include representatives of the farming unions and CLA, as well as the FSB and local Tourism Associations and Access Fora. In the case of the Llŷn JAC it also includes a representative of each of the 10 Community Councils within the AONB area, giving a strength of local representation not seen in the Welsh National Park Authorities.

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[19] http://openscotland.gov.uk/Resource/Doc/248663/0071297.pdf

4 Key findings from Phase 2: Detailed comparative analysis of the delivery of planning services in statutory designated landscapes in Wales

4.1 The Phase 2 report reviewed the delivery of planning services within the Welsh National Parks and AONBs. It sought to identify the key differences between planning in these two statutory designated landscapes. It identified where there are examples of good practice, and highlighted areas of weakness which may be priorities for future improvement. Throughout, it sought to compare the processes and outcomes of the NPAs with those of the constituent authorities of the AONBs.

4.2 The completion of the Phase 2 report relied heavily on input from both the National Park Authorities and Local Authorities and wider stakeholders, as described Chapter 2. We are very grateful for the co-operation of the individuals and organisations whose assistance has been invaluable. However, the overall response rate has been relatively **low** to:

- stakeholder interviews, with only around half of the individuals and organisations that were contacted having completed telephone interviews, often after repeated attempts to make contact. In particular, the number of interviews able to be completed with Community Council representatives and individual planning applicants was disappointingly low;

- the questionnaires sent to planning applicants, where out of 240 questionnaires that were sent out, a total of 49 (20%) were returned, 17 of which were from respondents in National Parks and 32 from respondents in AONBs;

- the questionnaires sent to Community Councils, where out of 185 questionnaires that were sent out, a total of 45 (24%) completed questionnaires were received, 28 of which were from respondents in National Parks and 17 from respondents in AONBs

4.3 Key findings to emerge from Phase 2 are set out below and should be read with the response rates in mind.

A comparison of planning within National Parks and AONBs in Wales

The Local Development Plan

4.4 The National Park Authorities (NPAs) have a firm and consistent planning framework in which to operate, planning to the boundary of the statutory landscape. Two of the three National Parks (Snowdonia and Pembrokeshire Coast) have adopted Local Development Plans (LDPs) while that of the Brecon Beacons NPA is an advanced draft approaching adoption (the current status of NPA LDPs is presented in **Appendix 4**). As identified in Phase 1 of this study, each National Park development plan provides a consistent policy context for planning within the statutory designated landscape, as it relates specifically and only to the area of each National Park (although it offers no control over the areas bordering the National Park which continue to be controlled by the surrounding LPAs). All policies are thus framed by the National Park purposes and socio-economic duty, following the guidance in Planning Policy Wales. The local plans also refer to the special qualities of their National Park.

4.5 In the case of the AONBs, planning is delivered to the administrative boundaries of the constituent local planning authorities of the AONBs (not to the boundary of the AONBs). The constituent LPAs of the Welsh AONBs do not all have a strong and consistent planning framework for their AONBs and there is limited commonality in the treatment of AONBs across these constituent LPAs. Currently none of the constituent LPAs of the AONBs have an adopted Local Development Plan in

place (although all except Anglesey have an adopted UDP) and there is considerable variation in progress towards this end, with some local authorities only just starting on production of their Local Development Plan (the current status of AONB LDPs is presented in **Appendix 4**). Overall, the NPAs are more advanced in the preparation of their LDPs when compared to the authorities with AONBs. In part this may be because planning to Park boundaries allows consistency in approach across the plan area. In addition, National Parks do not have to contend with major growth areas.

Prominence of statutory designated landscape within plan policies

4.6   All the National Park development plans (referring only to the National Park area) consistently give far greater prominence and weight to the national park designation and its purposes than the LPAs do to their respective AONB designations which, of course, do not cover their whole local authority area.

4.7   The National Park designation is referred to repeatedly throughout the three National Park development plans, with detailed information provided on what the designation means in terms of the planning system. All National Park development plans (the two adopted LDPs and one UDP) set out the statutory purposes of the National Parks in the introductory sections of the plan. All three of the National Park development plans also clearly define the special qualities that are referred to in the statutory purposes and summarise these in the plan.

4.8   During Phase 1 of this study, AONB officers commented that it was a challenge to get detailed, specific AONB policies into development plans, mainly due to LPAs wanting to avoid repetition of national policy. Only two (out of six) constituent development plans introduce their AONB at the outset of the plan, in these cases highlighting the importance of the AONB in a strategic objective or strategic policy.

Policy content

4.9   Although all current development plans of the constituent local authorities have clear policies for their AONB as shown in **Table 4.1** below, these are usually limited to one or two specific policies in the Environment (or equivalent) section of the plan. These policies are therefore required to 'work hard' to set out the nature of development that will be permitted in the AONB – an area which may cover a third to a half of the authority's area. Indeed, in policies the AONB designation may be given no greater prominence than other designations, such as Conservation Areas, which cover only a very small proportion of the local authority area.

Table 4.1: AONB-specific policies within relevant development plans

Planning authority	Is there a policy referring to development within the AONB in general?	Is there clear policy support/ guidance on traditional character and local distinctiveness?
Flintshire Council (Clwydian Range and Dee Valley AONB)	✓	✓
Denbighshire Council (Clwydian Range and Dee Valley AONB)	✓	✓
Anglesey Council (Anglesey AONB)	*No adopted UDP or LDP in place.*	*No adopted UDP or LDP in place.*
Gwynedd Council (Llŷn AONB)	✓	✗
City and County of Swansea (Gower AONB)	✓	✓
Monmouthshire Council (Wye Valley AONB)	✓	✓

Design guidance and equivalent

4.10 All three National Parks have a common Sustainable Design Guide (2009) prepared for them collectively. Pembrokeshire Coast and Snowdonia National Parks also have a raft of other Supplementary Planning Guidance (SPG) that amplifies their Local Plans and includes a landscape character assessment for each of their Parks – an important evidence document for a nationally designated landscape. Brecon Beacons NPA has recently commissioned a landscape character assessment. Again all these documents work to the National Park boundaries. **Appendix 5** provides a summary of relevant SPG and other guidance available in both National Parks and AONBs.

4.11 In the case of AONBs, all the constituent authorities benefit from LANDMAP (as do the National Parks) and some, such as Monmouthshire, Gwynedd and Anglesey have their own landscape character assessments but these work to the local authority boundaries and not that of the AONB (in England all AONBs have their own landscape character assessment funded by the then Countryside Commission / Countryside Agency). The one exception to this is the Gower AONB Design Guide that includes a landscape character assessment specific to the area of the Gower AONB. In addition, the constituent LPAs, while having a raft of relevant SPG have no SPG on Landscape or Design Guidance specific to their AONB other than Anglesey and the Gower with its AONB Design Guide. In only some cases, such as Wye Valley, has the statutory AONB Management Plan been adopted as SPG by the constituent local authority(s).

Member training

4.12 NPAs have a strong programme of joint training for their Members with NPAs joining together to offer this training. In the case of the AONBs by comparison, there is considerable variety in member training programmes amongst the constituent LPAs and in a number there is a recognised need for improvement. Training specific to planning in the AONBs is limited. Nevertheless, in both NPAs and the constituent authorities of AONBs, this training (where provided) tends to focus on planning process and roles (which is important) rather than on desired outcomes associated with the purposes of the statutory landscape designation and the importance of the areas' special qualities.

Relationship between the AONB officer and the constituent LPAs

4.13 Within AONBs the relationship between the AONB officers and the constituent LPAs varies for each AONB and may vary between the constituent LPAs in each AONB (where there is more than one constituent LPA). Depending on the LPA, the AONB officer may be consulted on all planning applications in the AONB, while others rely on the planning officer's judgement on whether the AONB officer should be consulted. In other cases still it is up to the AONB officer to consider whether they will make comment based on a review of the weekly lists of planning applications, as shown in **Box 4.1** below. These differences of themselves may not matter; potentially the greater issue is that through a combination of staff turnover and reorganisations an AONB officer may need to consult with up to nine different officers on a single application.

> **Box 4.1: Involvement of AONB officers/members in development management processes**
>
> **When the AONB officer is consulted:** In some authorities the AONB officer is consulted on all applications within or near the AONB (for example in Gwynedd the Llŷn AONB officer is emailed the details of applications and asked to respond with comments by a specified date), while others have no formal 'trigger' for consulting the AONB officer, relying on the planning officer's judgement on whether a significant effect on the AONB is likely. Some authorities also specifically consult the AONB officer on applications outside the AONB – for example, in Flintshire the officer is consulted on applications up to 1km away. This recognises that applications outside of the AONB may still impact on the setting of the AONB.
>
> **Identification of applications to be considered by the AONB officer:** In Anglesey and the City and County of Swansea (Gower AONB) the AONB officer receives a list of all planning applications, not just those within the AONB, allowing consideration of which applications may impact on the setting of the AONB. In the City and County of Swansea, the online application system is linked to GIS mapping, allowing the AONB officer to identify those applications that are

within Gower AONB or in locations where they may influence the setting of the AONB. Conversely, the Wye Valley AONB officer is not sent a list of applications by Monmouthshire Council or the other constituent LPAs in England; rather the officer must be proactive and search the weekly planning list to identify relevant applications.

Scale of developments referred to the AONB officer: Where AONB officers do not review all planning applications within their AONB, the emphasis is generally on reviewing the larger and more significant applications. In these instances development managers noted that, were the resources available, it would be helpful if AONB officers commented on a wider range of applications. The approach adopted for the Gower AONB, where the AONB officer is able to view a GIS map of application locations both within and near to the AONB, may allow for a more efficient review, enabling the AONB officer to identify the applications of most relevance and direct resources accordingly.

Involvement of members: In Flintshire, the Chair of the AONB Committee also sits on the Planning Committee. This ensures that the interests of the AONB are represented on the committee, without the need for an AONB officer to be present at the committee meeting. Likewise the Head of Planning at Denbighshire Council noted that there is crossover between the members involved in the AONB Committee and the Planning Committee.

Relevance of AONB officer comment: The involvement of AONB officers in planning decisions is generally seen as very positive in helping to achieve the AONB purposes through the planning process. Nevertheless, in one AONB authority there was concern that the comments of AONB staff may not always be clear or proportionate, or not relevant to the issues that planning can control. As a consequence, their views may be used selectively by the Planning Committee to justify their preferred decision, rather than actually informing or influencing that decision. This underlines the importance of the advice provided by AONB officers being clear, concise and relevant to both the application in question and the remit of planning.

The process of dealing with Planning Applications
Use of specialists

4.14   Interviews indicate that NPAs involve a greater range of specialists on larger or controversial applications than the equivalent for the constituent authorities of the AONBs and will often include a (consultant) landscape specialist.

4.15   Nevertheless, a number of the constituent authorities of AONBs (e.g. Anglesey) and National Parks (Powys) follow a Development Team approach from the pre-application stage for larger applications. Under this approach the prospective developer is invited to meet with a collective team that, depending on the nature of the application, will include: the case officer (Development Management); forward planning; AONB officer (in the AONB); landscape; conservation; highways; economic development; and education (where relevant). This ensures that there is an open discussion from the outset on the range of interests that may affect the development. It should also overcome the often quoted problem of applicants receiving different advice from different sections / departments of the local authority.

4.16   In addition, some NPAs / constituent LPAs (e.g. Anglesey) have a standard email circulation list to which all enquiries on smaller applications are sent covering forward planning; AONB officer (where relevant); environment / ecological co-ordinator; economic development and highways (where relevant). The case officer will then coordinate these responses. This applies to all smaller applications other than extensions and alterations.

Delegation of Powers

4.17   Generally the proportion of planning applications that are delegated to officers to determine is high – around 85-90% in both NPAs and constituent LPAs of AONBs, and in most authorities, both NPAs and LPAs, the reasons for delegating powers to officers are similar. Applications that go to planning committee for determination are selected based on criteria (usually clearly defined) which generally relate to the size of the application, any potential conflict of interest (e.g. if the application is made by the Council or one of its Members), and the general contentiousness of the application, usually measured by the level of objection received.

4.18   None of the constituent authorities of the AONBs include the AONB designation within the criteria for delegation. Nevertheless, applications within AONBs may sometimes be more contentious, which may lead to a higher proportion being determined by Committee – for example, in the City and County of Swansea it was noted that a higher proportion of applications from within Gower AONB are 'called in' to the Planning Committee than elsewhere.

Determination of planning applications within statutory timeframes

4.19   Within the three National Parks 64% of applications on average are determined within the statutory eight week period compared to a national average of 73% (see **Table 4.2** below). This compares to an average of 63% across the constituent authorities of the AONBs (but with considerable variation between them from 47% - 77%).

Table 4.2: Percentage of applications determined within eight weeks of receipt

Planning authority	Percentage of applications determined within eight weeks of receipt (Jan-March 2011 through to Jan-March 2012)
Pembrokeshire Coast NPA	66%
Snowdonia NPA	64%
Brecon Beacons NPA	62%
Flintshire Council (Clwydian Range and Dee Valley AONB)	68%
Denbighshire Council (Clwydian Range and Dee Valley AONB)	77%
Anglesey Council (Anglesey AONB)	73%
Gwynedd Council (Llŷn AONB)	55%
City and County of Swansea (Gower AONB)	61%
Monmouthshire Council (Wye Valley AONB)	47%
Wales average	**71%**

Source: Welsh Government Development Control Quarterly Survey

Shared issues

4.20   Through this study it is evident that there are two common issues shared by NPAs and the constituent LPAs of the AONBs. These are pre-application advice and enforcement.

4.21   **Pre-application advice:** All NPAs / LPAs of AONBs offer pre-application advice, and highlight its importance, especially in statutory designated landscapes. This advice is most commonly offered via informal e mail/telephone contact, although in addition many authorities offer planning surgeries/drop-in sessions (Brecon Beacons NPA, Snowdonia NPA, Denbighshire Council, Gwynedd Council, and Monmouthshire Council). This advice can open up dialogue between the authority and the applicant at an early stage when the application can more easily be amended and the likelihood of success increased in the sensitive environments of statutory designated landscapes. The informality of much of this advice (email, telephone or discussion) is appreciated by applicants but means that there may not be consistent carry through with subsequent advice, as much goes unrecorded. This was a significant issue raised by stakeholders through this study and also identified by the Country Land & Business Association (CLA) who identify inconsistency in pre-application advice as a significant issue for its members[20].   This is a long standing issue, which was recorded in the report on Farm Diversification and the Planning System submitted to the National Assembly of Wales in 2001[21].

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[20] CLA Wales (2012) 'Performance of the planning system in rural Wales', and 'Recommendations to ensure better functioning of the planning system in rural Wales'.
[21] LUC et al (February 2001) Farm Diversification and the Planning System.

4.22   Potential introduction of charging for this advice has a number of disadvantages, taking away from the informality and discouraging applicants from seeking such advice. It does have the advantage though, of ensuring that the advice is recorded in some way. The balance between informality and consistency is an issue that needs to be considered more generally.

4.23   **Enforcement:** Despite all NPAs and constituent LPAs of the AONBs having enforcement charters in place (which set out their enforcement responsibilities, along with how they will deal with planning breaches), there was widespread concern amongst environmental stakeholders, Members and planning officers, about the frequency of planning breaches and the way in which the planning authorities deal with them. Enforcement of planning breaches and failure to comply with conditions has been identified as the primary weakness within the planning system. Particular types of breach that were cited by interviewees as occurring most frequently within the National Parks and AONBs, were (a) tourism, for example with regard to the number and location of static caravans; and (b) agriculture, such as illegal structures appearing on farmland. Signage was also highlighted as an area of concern within the National Parks in particular, being a prime example of the conflicting interests of different groups. It was noted that only by being consistent in enforcement can the public be encouraged to comply with the planning system. A lack of consistency breeds resentment amongst users of the planning system (this is echoed in the CLA reports) and increases the likelihood of more breaches occurring in the future. Because of resource constraints nearly all planning authorities deal with breaches reactively i.e. when informed by others. There was a desire to see a more pro-active approach.

4.24   These issues are shared with the rest of the LPAs across Wales. Two further points raised by the CLA in their recent reports are viewed as common to planning in rural areas in Wales (i.e. including National Parks and AONBs, but not exclusive to these areas):

4.25   **Disproportionate requests for further information:** CLA members report that LPAs can often make unnecessary requests for additional information such as transport statements or protected species surveys when these seem irrelevant to the application. Examples cited were a request for a transport statement in relation to an application to install solar panels on a village hall roof, and a protected species survey (for bats) in relation to an application to install an additional velux window in a row of existing velux windows. These can be expensive to provide and can appear disproportionate and unreasonable for small applications.

4.26   **Impact of conditions or Section 106 agreements:** The Federation of Small Businesses (FSB) and CLA have also pointed to the costs and delays that can be associated with agreement on conditions and Section 106 agreements. These can render developments unviable either because of the time it takes to reach agreement and / or because of the costs that they will incur.

Views of stakeholders and of related officers on the treatment of planning within National Parks and AONBs

National Parks

4.27   There are clearly strong and contrasting views amongst stakeholders on the planning performance of the NPAs. Amongst 'environmental groups', at both the national and local level, there is a view that development should be more strictly controlled, especially larger-scale housing and tourism-related developments, to ensure that the National Park purposes are upheld. Related to this, it is also considered that there can be a conflict between the pressure for tourism related development within National Parks (and AONBs) due to the attractiveness of the area, and the sometimes unsightly or intrusive nature of the development and its pressure on local infrastructure and water resources (e.g. caravan parks). There is also a view as noted above that enforcement actions are inadequate and re-active with many breaches not being picked up, sending the wrong message to 'have-a-go' opportunists.

4.28   Conversely, amongst groups representing agriculture and other rural industries and amongst affordable housing and economic development officers of the constituent authorities of the National Parks, and some community councils, there is a view that NPAs are too restrictive, to the detriment of the social and economic needs of local communities. This is seen as especially

relating to restrictions on additional dwellings on farms and restrictions on signage (seen as essential for the viability of tourist enterprises).

4.29   All of those interviewed recognised the need for higher levels of protection within the National Parks, than elsewhere (in line with the statutory purposes). But many felt strongly that there is a need for more flexibility in the planning system, and a greater recognition of the socio-economic needs of local communities (in line with the socio-economic duty).

4.30   A recent Western Mail article[22] reported that house prices in the three Welsh National Parks have increased by 101% in a decade meaning that in the National Parks in 2012 average house prices are typically 10.8 times higher than average gross annual earnings. Much of this increase is driven by the highly attractive landscapes and the pressure for second homes.

4.31   The impact of the National Park designation on the delivery of affordable housing appears to be more significant and direct than in the AONBs, although the issue of complying with design guidance affects the viability of affordable housing developments in National Parks and AONBs. However, the views of affordable housing officers in constituent authorities vary significantly between the National Parks and even within the same National Park. Some felt that spatial policies in the National Park LDPs regarding locations where housing in general can be delivered is not releasing enough land for development, forcing land prices up and making affordable housing delivery much harder. Others felt that while the National Park designation does have an effect on the delivery of housing, these issues are being overcome successfully through co-working and good communication. Examples were cited of the constituent local authority and the NPA both sitting on a joint housing planning and strategic group and/or jointly funding a rural housing enabler so fostering a strong sense of joint working.

4.32   In terms of economic development, phrases such as the National Parks 'are closed for businesses' were used not infrequently during telephone interviews through this study. There was a view that NPAs needed to understand that they are managing a *living* not a *fossilised* landscape – a landscape that will evolve (not least to meet the challenges of climate change). Of particular concern was the need to meet stringent design policy and guidance with a heavy emphasis on the use of traditional building materials in new development (which can significantly add to the expense of development) rather than an over-arching requirement for development to be of sustainable design in keeping with surrounding landscape character. As a side issue the use of traditional materials (stone) can result in buildings that may not be as carbon efficient as other construction methods, such as the use of timber and straw bale construction which may bring higher carbon benefits.

4.33   It was suggested that a National Park designation is a 'double-edged sword' for the local economy. On the one hand, the designation significantly improves tourism potential and provides a destination cache which many other parts of rural Wales look on with envy. On the other hand, this benefit carries the burden of very restrictive planning policies which, even if not the case, is seen to deter would-be applicants who fear wasting time and money.

4.34   The issues that arose during the telephone interviews with economic development/regeneration officers reflect the findings of the FSB study into small businesses and the planning system in Wales[23], which found that business applicants felt that the economic benefits of their proposals were not given adequate weight in planning decisions. The issues relating to the importance of tourism within the local economy were also reflected in the findings of the Roger Tym and Partners study into Planning for Sustainable Economic Renewal[24] which concluded that planning for economic development is more rigid and less responsive than it could be. Although this study was not specific to statutory designated landscapes, it noted the need for stronger links to be forged between land use planning and economic development policies and interventions.

AONBs

4.35   Stakeholder concerns about planning within the AONBs are generally less than in the National Parks and there is also a greater appreciation that many of the issues identified in AONBs are, in

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[22] http://www.walesonline.co.uk/news/wales-news/2012/08/04/101-house-price-rise-for-wales-top-beauty-spots-91466-31543757/

[23] Federation of Small Businesses (2008) Small Businesses and the Planning System in Wales. Stage 1: Small Businesses' Costs and Experiences of Applying for Planning Permission and Related Consents.

[24] Roger Tym and Partners (June 2011) Planning for Sustainable Economic Renewal: Research Report to the Welsh Government.

fact, issues that are prevalent across rural areas more generally. AONBs are not picked out as being strongly constraining on development, certainly not to the extent identified for National Parks, nor is there so much concern about inappropriate development in the AONBs, although 'executive style' housing is seen as a significant issue and one that is generally of greater concern than economic development proposals. National Parks are seen as areas of distinct identity of community and place – as distinct and recognisable 'islands' with a very strong public image. Conversely AONBs are seen by the general public and planners as part of the wider landscape and communities of their authorities (although all do have their own very distinct geographical identity). This may in part reflect the different size of National Parks (together covering some 20% of Wales) compared to the AONBs (together covering just 5% of Wales).

4.36   The majority of AONB authorities felt that the presence of the AONB designation had no real influence on the delivery of affordable housing within their authorities. Although the officers identified a number of barriers to housing delivery, these were widespread rural difficulties rather than having any direct link to the AONB designation. Nevertheless, as in the National Parks there was frequent reference to the issues associated with strong design policies. In the case of economic development one of the most contentious areas of concern was the restrictive approach taken to signage – often an essential component of any successful tourism business in an isolated rural location.

Approval rates and appeals in National Parks and AONBs

National Park approval rates

4.37   Looking at the statistics on planning determinations, the reputation of NPAs as over-restrictive does not appear to be entirely justified (see **Table 4.3** below). Against a national average approval rate of 85.7% for the years 2008/09 the equivalent approval rates in Pembrokeshire Coast and Snowdonia National Parks were 85% and 87% respectively (the latter matching the national median quartile of 87% for the same two years). It is also important to note that Pembrokeshire Coast National Park has a target in its Corporate Plan to approve 85% of all commercial (economic) planning applications (which are widely defined to reflect the rural nature of applications made) and that this target is being met. The one National Park where approvals were significantly lower was Brecon Beacons where the equivalent approval rate was 73%. This falls below the 82.7% lower quartile of Welsh LPA approvals (for the years in question) and is the lowest amongst all Welsh LPAs in these two years (see **Table 4.3** below). This might be explained by the juxtaposition of this National Park next to the extensive development at the head of the Welsh Valleys although in England, the Peak District National Park, which is surrounded on every side by major conurbations, had an approval rate above the national average in 2011. However, based on statistics provided by the Brecon Beacons National Park Authority, the equivalent approval rate for the financial year 2011 was 83.5%.

4.38   But as already noted, there is a strong view that there are many proposals within the National Parks that never get as far as a planning application because potential applicants are advised by the NPA that they would be inappropriate within the National Park or indeed, shy away from making a planning application because of the perception of difficulties that will be encountered. This is very difficult to verify or quantify.

AONB approval rates

4.39   In the case of AONBs, the overall approval rate for planning applications within the AONBs for the year 2009 was 84.5%, similar to the national average of 85.7% and closely reflecting those in the remaining area of each constituent authority (average 85.3%). These approval rates are very slightly below those in Pembrokeshire Coast and Snowdonia National Parks.

4.40 **Table 4.3** below shows the approval rates for each National Park and each constituent authority of the AONBs from which the above figures were derived, for the years 2008 and 2009, being the years for which comparable data is available[25].

Table 4.3: Determination of Planning Applications in the Welsh National Parks and AONBs for the years 2008 and 2009

Statutory designated landscape	Approved	Refused	Total number of applications
Pembrokeshire Coast NP	~85%		
Snowdonia NP	~87%		
Brecon Beacons NP	~73%		
Clwydian Range and Dee Valley AONB (Flintshire Council)	82%	18%	202
Flintshire Council (whole LPA area)	*81%*		
Clwydian Range and Dee Valley AONB (Denbighshire Council)	85%	15%	170
Denbighshire Council (whole LPA area)	*84%*		
Anglesey AONB (Anglesey Council)	*No data available*		
Anglesey Council (whole LPA area)	*91%*		
Llŷn AONB (Gwynedd Council)	87%	12%	295
Gwynedd Council (whole LPA area)	*89%*		
Gower AONB (City and County of Swansea)	84%	16%	355
City and County of Swansea (whole LPA area)	*78%*		
Wye Valley AONB (Monmouthshire Council)	*No data available*		
Monmouthshire Council (whole LPA area)	*89%*		

Planning appeals

4.41 In terms of appeals, it is difficult to get actual comparable figures for numbers of appeals that are subsequently approved within the NPAs and AONBs. The national performance data collated by the Local Government Data Unit only includes an indicator relating to appeals (PLA/003) that measures the percentage of both planning application and enforcement appeals upheld for the Welsh LPAs (and does not include the NPAs). It also does not distinguish between planning appeals for proposals within AONB boundaries. The data for 2010-11 shows a range in upheld appeals from 50-100% across the LPAs.

4.42 Anecdotally, within the National Parks, the proportion of appeals that are subsequently approved was considered by officers to be in the order of 25% - 35%. This is backed up by figures in the

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[25] This data was not taken from the national performance indicators collated on InfoBaseCymru, as these do not provide data relevant to just the areas of the AONBs or the National Parks. Rather the data were gathered from (a) full planning register extracts for the AONB areas for the years in question provided by the constituent LPAs (although these were not provided by Anglesey and in the case of Monmouthshire were provided on a selective basis, and therefore have not been included); and (b) Welsh National Park Authorities Planning Services Review Stage 2 – Part B, PricewaterhouseCoopers (February 2011) that contains equivalent data on planning application approval rates for the NPAs. The actual percentages are not provided in the report but have been taken from Figures 1 and 2 of the Technical Supplement.

PricewaterhouseCoopers report[26], which stated that in Snowdonia NPA the percentage of planning appeals that upheld the authority's decision was 69% in 2008/09 and 72% in 2009/10. In Pembrokeshire Coast and Brecon Beacons NPA, the percentage of planning appeals that upheld the authority's decision was similarly high in 2008/09 (71% and 88% respectively) but dropped to 47% and 44% respectively in 2009/10. The report recognised that these lower figures in 2009/10 may have been skewed by relatively small changes in the actual numbers of appeals dealt with in that year.

4.43   This compares to the AONBs where the number of appeals that are subsequently approved within the constituent authorities was reported anecdotally by officers as ranging between 35-65% - potentially relating to the lack of an up-to-date policy framework in some cases. The number of appeals is not thought to be any higher in the AONBs compared to the constituent authority areas as a whole.

Differences in the perceived status and performance of National Parks and AONBs

Consistency in the planning framework

4.44   In Planning Policy Wales, National Parks and AONBs are given equal status in terms of landscape and scenic beauty: both must therefore be afforded the highest status of protection from inappropriate developments and treated as of equivalent status in development plan policies and development management decisions. Both also have a socio-economic duty to foster the economic and social well-being of their local communities. Yet the impression gained throughout this study is that, both amongst the planning community and the wider stakeholder community:

a)   National Parks and AONBs are seen as a hierarchy in terms of landscape importance, with National Parks at the top and AONBs coming second

b)   As one consequence of the above, National Parks are seen to be stifling economic development to the detriment of their communities and their long term sustainability.

4.45   There appears to be a conflicting picture. On the one hand there are the National Park Authorities that have a strong and consistent planning framework, operating to the park boundaries, and in terms of certain performance indicators are operating more efficiently than their AONB counterparts. The National Park model provides a clear focus on achieving the statutory purposes of National Park designation but this is often seen as being at the expense of the well-being of local economies and communities.

4.46   On the other hand, the AONBs have a variable planning framework covering the designation, with often considerably less focus on the purpose of AONB designation in local plan policy. There is also no evidence that the constituent authorities of AONBs work together to consider the challenges of planning within AONBs – there appears to be little sharing of best practice.

4.47   Equally, the constituent LPAs are not being as successful in meeting certain key performance indicators, when compared to the NPAs. Yet the AONB designation does appear to be consistently recognised in planning determinations. There is also generally less concern amongst stakeholders about the performance of the constituent authorities of AONBs, when compared to the NPAs, both in terms of allowing inappropriate development or in constraining activities seen as important to the socio-economic performance of local communities. Nevertheless, strict design policies are of concern in both National Parks and AONBs.

4.48   Although based on a very small sample, there is evidence that within AONBs, as within National Parks, AONB policy is regularly considered in the determination of relevant planning applications. From the questionnaire returns from planning applicants: 15 out of 32 applicants in AONBs said they were advised on design guidance or policy in support of their planning application compared to 5 out of 17 applicants in National Parks. Equally, from the same questionnaire 22 out of 32 applicants in AONBs compared to 8 out of 17 applicants in National Parks felt that the statutory designation had a significant bearing on how their application was dealt with. Likewise in the 10

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[26] PricewaterhouseCoopers (February 2011) Review of the Welsh National Park Authorities' Planning Services.

randomly selected planning applications in AONBs reviewed through this study, all show evidence that the AONB designation had been considered in the decision-making process, with a high proportion of decisions based on the impact (or otherwise) of the proposal on the AONB. So, despite a variable approach to planning within the AONBs, from the case study applications reviewed and applicant questionnaires it seems that the AONB designation is being regularly considered in planning decisions and consistently referred to during determination of planning applications within AONBs, although AONB officers and local societies have indicated that:

- Some planning decisions do not reflect the intention of the identified AONB policies.

- Amongst some planning officers and members there is a lack of awareness or understanding of the purpose of the AONB policies or their national context.

Relationship with the constituent authorities

4.49 A central issue identified through this research has been the relationship between the statutory designated landscape and their constituent authorities who, in both AONBs and National Parks, retain the primary responsibility for community and economic development. In the AONBs this relationship is straightforward in that the constituent authorities are responsible for both the planning function and socio-economic development, allowing ease of liaison between the two and enabling joint working to a common agenda. Although, as identified in the Roger Tym Report (para 4.37) location in the same authority does not automatically ensure joint working. This research has also indicated that the AONB designation generally fits within the overall local authority strategy in that the AONBs are in the most rural parts of the authority areas. On the other hand, in the National Parks, there is a split in these responsibilities, with planning responsibilities held by the NPA and socio-economic functions retained by the constituent authorities. Joint working, as identified in the socio-economic duty, is therefore key but not universally achieved.

4.50 This research has indicated considerable variability in performance amongst NPAs in joint working with their constituent local authorities and others. It is evident that there is very much better joint working where there is a 'one to one' or 'one to two' relationship between the NPAs and their constituent authority(s), often based on a history of joint working. This relates to both plan preparation and subsequent development of strategies and development management. In these instances during plan preparation there has been significant information sharing between NPAs and their constituent authority(s) and joint development of the evidence base, for example co-operating on housing and retail studies. Here conflicts between the National Park purposes and socio-economic duty have been or are being addressed, through co-working and communication. The NPAs may share certain specialist officer posts with their constituent authority(s), work closely with the constituent authority(s), and sit on joint working groups / partnerships. There is a growing sense of mutual respect at officer level, and an emerging view that the NPAs are now quite well-engaged with the need for economic development and regeneration, working towards managing a living environment. Evidence also suggests that there is growing co-operation between these NPAs and their constituent authority(s) on planning applications that are cross-boundary, large or proximate to the National Park.

4.51 In addition, it is recognised that having shared objectives will be of particular importance in the context of the two proposed Enterprise Zones in Pembrokeshire and Gwynedd, both of which include an area of National Park. Achieving a balance between the goals of the Enterprise Zones and the purposes of the National Park may be challenging, and it will be necessary for Gwynedd and Pembrokeshire County Councils as well as the Pembrokeshire Coast and Snowdonia NPAs to receive clear and consistent guidance. It would also be good for officers within the relevant local authorities and NPAs to work together on this, to achieve a Wales-wide approach.

4.52 Where the relationship between the NPA and its constituent authorities is one to many (four or more constituent authorities) the relationship between the two appears to be much more variable. At the plan-making stage the constituent authorities recognise that there is considerable scope for improvement, with the reasons cited for lack of effective co-working including the differing timescales of the authorities' LDPs and differing agendas and priorities of the authorities, with the NPA being perceived as prioritising environmental issues too highly, to the detriment of socio-economic concerns.

4.53   In this case, although the NPA sits on a number of partnerships, NPA officers often do not attend these, tending to reduce trust between the NPA and its constituent authorities and suggesting an unwillingness to engage with economic needs. There is a sense, perceived or real, that there is a lack of engagement with the socio-economic duty. It is this National Park that received the greatest criticism from stakeholders. It was also this NPA (compared to other NPAs) that performed least well against national performance indicators, in terms of plan development and planning approvals. Clearly though, it is very much more difficult to liaise with a considerable number of constituent authorities.

5   Conclusions

5.1   In summary, while there are many examples of good practice within NPAs and constituent LPAs of AONBs, as well as good performance in relation to national indicators for planning service delivery, from all the findings of our work in Phases 1 and 2, there appear to be two major concerns to be addressed going forward. These can be summarised as:

- Within AONBs, and particularly National Parks, a strongly embedded perception amongst local communities and local businesses that planning stands in the way of ensuring the long term sustainability of local businesses, threatening the economy and communities of these designated landscapes; and

- In the case of AONBs, the lack of a strong planning framework that clearly recognises that these designated landscapes have an equal status to those of National Parks - "*National Parks and AONBs are of equal status in terms of landscape and scenic beauty and both must be afforded the highest status of protection from inappropriate developments*" [Planning Policy Wales 5.3.6].

5.2   Within these two broad concerns are a number of more specific barriers that have been identified as standing in the way of delivering efficient and effective planning services in the statutory designated landscapes of Wales, as set out below. These reflect our discussions with numerous key stakeholders during telephone interviews and at the two workshops in July 2012, and reflect the guidance for planning in National Parks and AONBs provided in Planning Policy Wales.

5.3   Chapter 6 then sets out our recommendations and potential solutions for addressing these barriers, with reference where relevant to the current examples of good practice already taking place within Welsh NPAs and constituent LPAs of the AONBs.

Barriers to effective planning delivery

Limited policy guidance on landscape issues

Policy vacuum on landscape issues at the national level

5.4   Many stakeholders were of the view that landscape policy and guidance at the national level is limited (Phase 2 research and Stakeholder workshops in July 2012). While Planning Policy Wales clearly affords National Parks and AONBs the highest level of protection there is felt to be limited guidance in Planning Policy Wales and, more particularly, in any of the supporting TANs as to how this protection can be achieved in practice. This includes little reference to the tools that can help enable the conservation of landscape character and quality – namely LANDMAP and the use of Landscape Character Assessments and linked Landscape Sensitivity and Capacity Studies. For planners unfamiliar with landscape issues, the lack of reference to landscape tools can make it difficult to know how to avoid development affecting the quality of the landscape.

5.5   The lack of specific emphasis on landscape in policy for National Parks and AONBs relates in part, no doubt, to the wording of the 1949 National Parks and Access to the Countryside Act which identified the first purpose of National Parks as "preserving and enhancing the natural beauty of the areas" updated in the 1995 Environment Act to read "conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas". In turn, this underpins the current guidance in Planning Policy Wales that "in National Parks and AONBs, development plan policies and development control decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas" [5.3.6]. Reflecting this, both National Park Authorities and LPAs in the past have been much quicker to employ ecologists and building conservation officers than they have landscape specialists, a situation that has been mirrored in

the English National Parks where landscape specialists remain uncommon within National Park Authorities – yet National Parks and AONBs are first and foremost a landscape designation, referred to collectively as the statutory designated landscapes of Wales and the protected landscapes of England.

5.6   In part this lack of emphasis on landscape and the tools for landscape conservation in national policy could be picked up in the national policy statement for National Parks that is currently being reviewed but there is currently no equivalent for AONBs.

Policy differences at the local level

5.7   At the local level, each National Park development plan does provide a consistent policy context for planning to the boundary of the statutory designated landscape, in line with the national park purposes. All three National Parks are or soon will be supported by a landscape character assessment for their national park area. Conversely, the constituent LPAs of the Welsh AONBs do not all have a strong and consistent planning framework for their AONBs, with heavy reliance placed on one or two policies (para 4.9). There is limited commonality in the policy treatment of AONBs across these constituent LPAs or indeed between the constituent authorities of a single AONB (Phase 2 research). With the exception of the Gower and Anglesey, there is also no SPG relating to landscape quality and sensitivity. Nevertheless, from our research it appears that AONB policies within local development plans <u>are</u> consistently referred to during determination of planning applications within AONBs (para 4.48), although AONB officers and local societies have indicated that:

- some planning decisions do not reflect the intention of the identified AONB policies

- amongst some planning officers and members there is a lack of awareness or understanding of the purpose of the AONB policies or their national context.

5.8   In addition, while a number of the constituent authorities of AONBs do have landscape character assessments for their Council area (Anglesey, Gwynedd, Monmouthshire) none are specifically for the AONB area other than that for the Gower that forms part of the Gower AONB – Design Guide (para 4.11). Having a consistent Landscape Character Assessment for the whole of the AONB area is particularly beneficial where AONBs cross administrative boundaries

Perception of planning in AONBs and National Parks

Public perception of planning in AONBs and NPs

5.9   In groups representing agriculture and other rural industries and amongst affordable housing and economic development officers of the constituent authorities of the National Parks, and some community councils, there is a view that NPAs do not take account of the socio-economic needs of the National Park to the detriment of the sustainability of local communities. Phrases such as the National Parks 'are closed for businesses' were commonly used in consultations through this study. This is seen as especially relating to restrictions on additional dwellings on farms and restrictions on signage (seen as essential for the viability of tourist enterprises). As a consequence, there is a widespread view that individuals are discouraged from attempting to make a planning application.

Socio-economic issues

5.10   Directly linked to the above, there is a strong perception that decision-making on applications within National Parks and AONBs is too heavily weighted in favour of conservation, and that more emphasis should be placed on the socio-economic needs of the people who actually live in the area and need to make a living there. Even when applications are approved the nature of conditions and / or requirements under a section 106 agreement may be so stringent (and expensive) as to make the proposal economically unviable. This also has implications for the supply of affordable housing within the statutory designated landscapes. The delivery of affordable local housing usually depends on financing by permitting open market housing within the National Park/AONB. Thus there is financial pressure to permit open market housing which might not accord with National Park or AONB purposes (for example a development of ten houses

within a small rural settlement could result in a large change in character for that settlement). Alternatively the use of exception sites for affordable housing may lead to the unwanted spread of settlements.

5.11   There is equally a view amongst some stakeholders that economic and social considerations are not taken into account at the right time. In particular there is a view that socio-economic considerations are not given sufficient consideration at the plan-making stage, nor at pre-application advice meetings.

Split of responsibilities between NPAs and AONBs and their constituent LPAs

Geography of NPs versus AONBs

5.12   Both the National Parks and AONBs in Wales cover very rural areas. Overall the five AONBs are relatively small in size (when compared to the National Parks) together covering some 5% of Wales. They generally form the most rural part of their constituent authorities and do not include any major settlements of strategic importance. Their area therefore falls naturally into the LDP strategy of their constituent authority(s), falling into the general policy framework for the most rural parts of the local authority area. By comparison, the three National Parks are much larger, together covering 20% of Wales. Unlike the AONBs they also include significant settlements (Brecon in the Brecon Beacons National Park; Bala, Dolgellau and Betws-y-Coed in Snowdonia; and Tenby in Pembrokeshire Coast National Park). These settlements will form part of the economic and housing strategies of the constituent authorities of the National Parks but lie outside their control in terms of planning. In the past this has set up tensions between the constituent authorities and the National Park Authorities in terms of matching their respective strategies for the same areas of land.

Division of responsibilities between NPAs and constituent authorities

5.13   There is a view among some stakeholders (Phase 2 research) within constituent local authorities of National Parks that there is a lack of partnership working between the NPAs and their respective LPAs. This is primarily the case in National Parks that have a number of constituent authorities. This can include a perceived lack of willingness to share information and intelligence, as well as a lack of understanding of the constituent LPAs' objectives, especially with regard to economic development and affordable housing for which they are responsible.

5.14   Conversely, there is a perception among NPA stakeholders that constituent local authorities may not recognise their duty under section 62.2 of the Environment Act for all layers of government to have regard to National Park and AONB purposes in their operations. As noted in Planning Policy Wales [5.3.7] "this duty applies to activities affecting these areas, whether those activities lie within or outside the designated areas".

5.15   The above underlines a long standing emphasis on partnership working between the NPAs and their constituent authorities, with each understanding the priorities of the other. This was first captured in the Edwards' review of National Parks – 'Fit for the Future' (1991) and set out in the Government's response to this review in 'Fit for the Future: A statement by the Government on Policies for the National Parks', Department of the Environment, Welsh Office, January 1992. This states that National Park Authorities "should take full account of the economic and social needs of local communities as they carry out their park purposes and work in close co-operation with [their constituent] local authorities on economic and social issues" [para 2.4]. And in para 5.12 notes that "....trends in employment may make the National Parks increasingly attractive to new forms of economic activity that are entirely compatible with the Park environment. As planning authorities, Park authorities have opportunities to foster such developments and, in co-operation with local authorities, to create a climate in which their local economies can prosper." This partnership working is being strongly pursued in some NPAs but not others (para 4.50-4.52).

Inconsistency in development management

Nature of applications

5.16   There is a general view amongst stakeholders that the larger economic and residential development applications are easier to deal with as relevant specialists can help advise on the decision (with some LPAs adopting a Development Team approach) and, in the case of National Parks, appropriate liaison can be established with the constituent local authorities. More problematic are small-scale economic developments, such as those associated with farm diversification, where no two applications are similar making it more difficult to: develop generic advice; be consistent in approach; know which specialists to involve; and, in the case of the National Park Authorities, judge the appropriateness of engaging with the relevant constituent authority in reaching a decision. For the same reason residential development applications in the open countryside can be difficult to determine, especially holiday accommodation, holiday conversions and rural enterprise dwellings. Yet it is these small-scale rural developments that make up a high proportion of the applications in AONBs and National Parks. Open market (executive) housing is considered especially problematic often presenting more significant effects on the landscape than small-scale business / economic developments.

5.17   As a consequence, for applicants of small-scale proposals there is general uncertainly as to what would be considered a suitable application / development within a statutory designated landscape.

Inconsistency in the decision-making process

5.18   It is the nature of small-scale rural developments, therefore, that makes it more difficult to achieve consistency in the determination of planning applications. But in the view of stakeholders this is significantly exacerbated by inconsistencies in:

- the way in which AONBs are treated within the policies of the constituent LPAs' LDPs (para 4.9)

- the interpretation of planning policy by development management officers (para 4.48), as well as inconsistent decision-making between AONBs on similar issues;

- decision-making between development management officers and Committee members (in both AONBs and National Parks) when officers put forward recommendations that are subsequently overturned at Committee.

5.19   However, the greatest concern amongst applicants relates to the inconsistency in advice given by the NPA / LPA at the pre-application stage and subsequently, with some applicants receiving conflicting advice as their application progresses through the application process. This is particularly the case where there is no recording of the advice given at the pre-application stage. This is an issues that can be common to the treatment of all planning applications across Wales but is highlighted in National Parks and AONBs by the individual nature of the applications that they receive (para 4.21).

Lack of landscape resources

5.20   As identified in Chapter 3 none of the NPAs and only some of the constituent authorities of AONBs have in-house landscape specialists. In the case of larger applications this issue can be addressed by bringing in specialist advice but for smaller applications this is unlikely to be practical. It is a view of stakeholders that this lack of landscape specialism combined with a lack of landscape information and guidance (as in Landscape Character Assessments and Sensitivity Studies) can further add to the inconsistency in advice given.

Over emphasis on the use of traditional materials

5.21   Many stakeholders representing small businesses highlighted the requirement to use traditional building materials in new developments as adding significantly to the cost of the development. In part, Planning Policy Wales is blamed for this emphasis although, in fact, its requirement is in "areas with an established and distinctive design character it can be appropriate to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development, and the use of

appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important". Thus it can be that fit with landscape character and achievement of environmental sustainability will be as important as the use of traditional materials, encouraging the use of materials such as timber construction in new build.

Lack of enforcement (exacerbates perception of inconsistency)

5.22   Finally, there is general agreement amongst all stakeholders that lack of enforcement against planning breaches within National Parks and AONBs exacerbates a sense of inconsistency. Those working within the NPAs and LPAs agree that the enforcement system is not working, and cited barriers such as the complexity of relevant legislation, the process being very complicated, LPAs and NPAs not having enough 'teeth' (i.e. powers) and the high cost of enforcement action (Welsh Government and the LPA bear the costs) (para 4.23).

Governance

Lack of community representation

5.23   There are two main issues that have been identified through this study with regard to Governance structures. These are that:

- The National Park Authorities have a well understood structure with one-third of their members appointed by the Welsh Government and two-thirds being councillors nominated by the constituent local authorities of the National Park area. In this way the NPAs aim to represent both national and local interests. However, many of their members are not drawn from within the National Park, with some of the constituent authorities nominating members from entirely outside the National Park in question, to ensure that an equitable balance is maintained between the different political parties. This has led many National Park communities and local businesses to feel poorly represented by their Authority. It has also meant that planning decisions, when referred to the Planning Committee, may be being made by people with no direct association with the National Park area.

- By comparison, the Joint Advisory Committees (JACs) of AONBs do usually include local representation in the form of local representatives of the farming unions, small businesses and tourism associations, while the Llŷn AONB also includes Community Council representation (from those Community Councils within the AONB area). However, these JACs in the main do not comment on planning matters. There is also little consistency in the structure and governance between the different Joint Advisory Committees and all act differently, making it more difficult for people to know how to engage with them.

Member training

5.24   In the case of member training, while NPAs have a strong programme of joint training for their members, there is considerable variety in member training programmes amongst the constituent LPAs of the AONBs and little sharing of member training between local planning authorities who have an AONB. In a number of these Local Planning Authorities there is a recognised need for improvement. Nevertheless, in both NPAs and the constituent authorities of AONBs, this training (where provided) tends to focus on planning process and roles (which is important) rather than on desired outcomes associated with the purposes of the statutory landscape designation and the importance of the areas' special qualities.

Position of AONB officer

5.25   Finally, for AONB officers there can be a dilemma in making recommendations contrary to the views of the planning officers of the local authority that employs them. There is a worry that they will be sticking 'their neck out' against the views of their employers. This makes it more difficult for AONB officers to take an independent view, potentially different to that of the local authority that employs them.

Performance monitoring

5.26   While not necessarily a barrier to planning service delivery, there is a limitation in the current framework for measuring performance of LPAs and NPAs, in that there is no national reporting on:

- The % of planning applications approved within National Parks. This information is collected by the National Parks but is not recorded against the national performance indicator PLA/002 - the percentage of applications for development determined during the year that were approved, collated on InfoBaseCymru.

- The % of commercial (economic) planning applications approved within each National Park and the constituent authorities of the AONBs each year. For example, Pembrokeshire Coast NPA has a target in their Corporate Plan to approve 85% of commercial activities (which is monitored against and is being met). In this instance the definition of 'commercial' activities has been broadly defined to reflect the nature of rural businesses and includes all aspects of farm diversification, including holiday accommodation and associated signage.

- The quality of the planning outcomes, i.e. the suitability of development taking place within NPs and AONBs with statutory landscape purposes. Currently there are no indicators that have been developed for this, or monitoring undertaken to measure outcomes within the NPAs and constituent authorities of the AONBs.

6   Recommendations

Potential solutions to overcoming barriers to planning service delivery in statutory designated landscapes

6.1   From our evaluation of planning service delivery in NPs and AONBs (including examples of good practice), as well as our analysis of stakeholder perceptions regarding planning services, and our review of other models of delivering planning services in statutory designated landscapes in England and Scotland, we have identified a number of potential solutions to overcoming the barriers described in Chapter 5. These are presented as a series of recommendations below.

6.2   Ever since National Parks and AONBs were created there has been a strong view expressed by local communities and businesses that the designations stand in the way of necessary development. Through this research it is evident that within National Park Authorities considerable effort has been put in place to try and address this criticism. Within National Park Authorities across the UK there are many examples of good practice on which the recommendations below draw.

6.3   At the forefront of these recommendations is:

- the need to conserve and enhance the special landscapes of National Parks and AONBs, reflecting the importance placed on them in statute and in Planning Policy Wales, ensuring that these resources are passed on to future generations in as good if not better condition than they are now;

- but in so doing ensuring that viable communities and local businesses are able to thrive in harmony with the landscape, demonstrating the very best in sustainable development.

6.4   To do this, the planning system needs to pro-actively support the communities and businesses of the statutory designated landscapes and have the evidence and policies needed to support sound decision-making.

RECOMMENDATIONS

National guidance and improved information on landscape and landscape tools

6.5   National Parks and AONBs are first and foremost a landscape designation. This study has highlighted the relatively limited reference to the landscape in national planning guidance and to the tools available to provide a sound landscape evidence base to inform forward planning and development management. Planning Policy Wales para 5.3.13 notes:

"CCW's LANDMAP information system methodology is an important information resource upon which local planning authorities can draw on, making the landscape assessments needed to inform local policy, guidance and decision making in this field. LANDMAP describes and evaluates aspects of the landscape and provides the basis of a consistent Wales-wide approach to landscape assessment. LANDMAP assessments should be published. They can help to inform supplementary planning guidance on landscape assessment (covering, for example, local distinctiveness, special landscape areas and design)."

6.6   This guidance is not expanded in the relevant TANs. It is therefore recommended that:

RECOMMENDATION 1: Greater reference should be made to landscape and the tools that can assist sound landscape planning in the relevant TANs when they are next

updated: This and the other recommendations in this section are important in encouraging a consistent landscape evidence base for the statutory designated landscapes. This evidence can assist sound decision making both in development planning and development management, allowing decisions to be made on whether individual proposals are compatible with the landscape.

It is recommended that greater emphasis on the landscape tools available to inform decision-making is contained in either an addition to TAN 5: Nature Conservation and Planning to be retitled 'Nature Conservation and Landscape and Planning' or TAN 12: Design and retitled 'Landscape and Design'. Alternatively there could be a new TAN devoted to Landscape Planning. This is particularly important if greater emphasis is to be placed on encouraging sound decision-making in keeping with landscape character. The relevant TAN should then be cross-referred to in TAN 6: Planning for Sustainable Rural Communities.

This advice should:

- Introduce LANDMAP.

- Indicate how LANDMAP can be used as a basis for individual landscape character assessments and, in turn, how landscape character assessments can include guidance specifically aimed at supporting development management decisions including the use of landscape sensitivity and capacity studies.

RECOMMENDATION 2: The emerging revision to the National Policy Statement on National Parks (which will now also cover AONBs) should stress the equal importance of these landscapes and the landscape tools available to assist in sound landscape planning within them. This statement offers an early opportunity to stress the importance of providing a sound evidence base on landscape character across the whole of each statutory designated landscape to inform decision making as identified above.

It also provides an important opportunity to:

- Highlight the importance of ensuring that viable communities and local businesses are able to thrive in harmony with the landscape, demonstrating the very best in sustainable development.

- Highlight the importance of developing a sound policy framework for AONBs in the Local Development Plans of their constituent authorities – reflecting the national importance of these landscapes (see Recommendation 4 below).

- Signpost to the Section 62(2) duty (of the Environment Act) requiring "all relevant authorities to have regard to the statutory purposes of National Parks" and the similar duty for AONBs set out in Section 85 of the CRoW Act 2000. This is captured in Planning Policy Wales which notes [5.3.7] that "The duty to have regard to National Park and AONB purposes applies to activities affecting these areas, whether those activities lie within or outside the designated areas."

RECOMMENDATION 3: The current CCW guidance on the preparation of AONB Management Plans should include an addendum on planning within AONBs. The work undertaken in Phase 1 of this study has highlighted the value of planning to the boundaries of the statutory designated landscape. The statutory AONB Management Plan is the one document that looks at the AONB as a whole and plans for its future as a whole. However, it is appreciated that the whole Management Plan may be too large to adopt as Supplementary Planning Guidance (SPG).

The current AONB Management Plan guidance already encourages all AONB management plans to identify the special qualities that define the AONB and which need to be protected through all decisions. The purpose of the proposed addendum to the CCW guidance would be to encourage the production of a section of the Management Plan that identifies the specific issues that need to be considered in development management within the AONB. This should be drawn up in close consultation with the forward planners of the relevant constituent authorities. It should include:

- A summary of the landscape character of the AONB identifying separate landscape character types / areas as in the Gower Design Guide taken from an up to date Landscape Character Assessment (**Recommendation 6**).

- Guidance notes for development within each of these landscape types / areas.

- More general sustainable design principles that illustrate the types of development that can be accommodated within the landscape.

Depending on the adopted structure of the Management Plan this need not be one section. The main requirement is that the relevant sections, including the identification of special qualities, can be lifted out of the Management Plan to form SPG for planning within the AONB. Clearly these sections will not be required if there is already adopted SPG for the AONB that addresses these issues.

The policy framework at the local level

6.7 The Phase 1 research has identified the value of planning to the boundaries of the statutory designated landscapes in terms of ensuring achievement of the purposes of the designations. In Wales this is exemplified by the National Park Local Plans. The policy framework is weaker for AONBs (para 5.7) and may lack the supporting evidence base in terms of a landscape character assessment that covers the whole of the AONB area. It is therefore recommended that:

RECOMMENDATION 4: The AONB statutory designated landscape should be identified prominently in the introductory sections of the local development plans of the constituent authorities of AONBs to highlight the importance of the AONB within the local authority area. This could either be in the form of a strategic objective or policy. Currently most relevant development plans do not refer to the AONB in the introduction to the plan or in the Vision even if the AONB covers a significant part of the local authority area. Exceptions are Strategic Policy 2 in Gwynedd Council's adopted UDP and the Deposit Draft LDP for Monmouthshire which includes a strategic objective:

"…protecting high quality landscapes throughout the County, paying particular attention to those contained in the Wye Valley AONB and in the setting of the Brecon Beacons National Park".

This should be supported by one or more specific policies on development in the AONB. These policies will be particularly important, as they need to set out the principles of what development will be permitted in the AONB and in what circumstances. This may be assisted by providing supporting text to the specific AONB policies that describe the purpose of AONB designation as in the City and County of Swansea's adopted UDP supporting text to policy EV26 (Area of Outstanding Natural Beauty).

In the case where an AONB crosses a number of administrative boundaries it would greatly aid consistency if all the relevant Local Development Plans adopt a similar policy approach, requiring liaison between the different constituent authorities.

RECOMMENDATION 5: The AONB designation should be supported by SPG for planning across the whole of the AONB area (reflecting RECOMMENDATION 3).

RECOMMENDATION 6: Planning within statutory designated landscapes (both National Parks and AONBs) should be informed by a sound evidence base relating to the socio-economic needs of the area and its landscape character.

- In the case of **socio-economic needs** in AONBs this should be picked up through the wider studies for the constituent local authority area(s) but it will be important that these reflect the needs of the more rural areas of the authority(s) (where the AONBs are located). In the case of the National Parks this requires close working between NPAs and the economic development and affordable housing officers of the constituent authorities (see **Recommendation 12**).

- In the case of landscape character, all AONBs that cross administrative boundaries should ideally have a **Landscape Character Assessment** that works to the AONB boundary. Where an AONB lies within a single authority the Landscape Character Assessment for that authority should clearly delineate the boundary of the AONB and all should include guidelines on development for each landscape character area (**Recommendations 3 & 5**).

Improving the perception of planning (especially development management) in AONBs and especially National Parks

6.8   As reported through this study, there is a strong perception that planning in AONBs and especially in National Parks stands in the way of commercial (business) development. This is a perception that has pervaded for many years, reported back in the 1991 Edwards' Review. Because it is of long standing it is deeply embedded, even if the record of some National Parks in terms of planning approvals is similar to that of some other rural planning authorities (**Table 4.3**).

6.9   National Park Authorities therefore need to pro-actively seek sustainable socio-economic opportunities in harmony with the designated landscape, identifying opportunities of mutual benefit. This fits with the agendas of the Green Paper – Living Wales and the forthcoming Sustainable Development Bill, as well as the Rural Development Programme 2014 - 2021. All are seeking sustainable development that considers the needs of the economy, communities and the environment together. In the case of statutory designated landscapes the need to protect the landscape remains but there are many types of economic activity that can be accommodated in these environments especially many forms of micro-business, those that add value to land based products, and sustainable tourism, as well as 'high tech' businesses. There is a strong case for National Park Authorities to adopt a 'can-do' outward facing mentality that is welcoming (including through the planning system) of those businesses that have a good fit with the environment of the National Parks. It is therefore recommended that:

RECOMMENDATION 7: National Park Authorities should prepare a Sustainable Development Strategy which is subsequently adopted as SPG. The purpose of this Strategy would be to identify the types of Sustainable Development that will be welcomed in the National Parks, the reasons why, and key criteria of acceptability associated with the economy, community and environment. Such a Strategy should not overlook the importance of existing local businesses that have established networks into the local economy and employ local people (assuming that their impact on the environment is benign). Such a strategy (and planning more generally) should be prepared to back winners that are embedded in the local economy and community where there is confidence in a business's continuing local benefits.

Such a Strategy would need to draw on a strong local evidence base (**Recommendation 6**). It would need to be developed in close partnership with the economic development team of the constituent authority(s) and in close collaboration with local businesses and communities, being a Strategy with very clear shared ownership. It would need to take full account of any economic development strategies of the constituent local authority(s) and also the Local Development Plan for the National Park. The process of preparing the Strategy should be as (or more) important than the Strategy itself, building trust and mutual respect between the National Park Authorities and their communities and businesses.

Recognising the need to maximise cost-effectiveness, such a Strategy might directly link to the delivery of the next Rural Development Plan (RDP) 2014 – 2021. Early indications are that the RDP will prioritise protecting the environment and resource efficiency; climate change adaptation; community-led local development; and the renewal of rural communities. Early thinking suggests that there will be a strong focus on job creation and bottom-up approaches that directly involve local communities. It is anticipated that funding will be focused on defined geographical areas displaying common issues and opportunities, supported by close collaboration between different agencies and authorities working within these defined areas.

A purpose of this Strategy will be to provide a broader context to development management allowing business and community needs to be seen alongside environmental constraints – trying to encourage development that is good for business, community and environment[27].

RECOMMENDATION 8: National Park Authorities should consider collaborative approaches with local communities for planning the future of their settlement, exploring socio-economic needs. These should link to the Park's Sustainable Development

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[27] This may be informed by 'Mapping the Rural Economy – A Toolkit for Decision-making Support' (2004) prepared for the WDA and Monmouthshire County Council.

Strategy and could follow the example being set by the Brecon Beacons National Park Authority, which is piloting a Community Strategy in Sennybridge.

RECOMMENDATION 9: Working with the WLGA, the National Parks Wales (NPW), the Campaign for National Parks, and the National Association of AONBs, NPAs and the constituent authorities of AONBs should positively promote examples of socio-economic development in the statutory designated landscapes that fit with their statutory purposes and which have brought strong local economic and community benefits. This would be through material on the websites of the respective organisations, illustrating the types of development being promoted in the Sustainable Development Strategies – developments that are bringing economic and community benefits, as well as blending with the landscape / townscapes of the statutory designated landscapes. All should illustrate the importance of good design but should not be overly dependent on the use of traditional materials, also illustrating the use of relatively inexpensive materials such as timber and natural roof materials that can be incorporated into high quality design and can enable developments to blend into the landscape. The emphasis should be on living and working landscapes that are retaining their special qualities but are changing with the times. The purpose would be to build a picture of the types of sustainable development that the National Parks and AONBs are keen to encourage. Examples may, in part, be drawn from projects funded through the Sustainable Development Fund (SDF) of National Parks and AONBs.

RECOMMENDATION 10: Each National Park Authority should set up a Planning Advisory Group to advise on the on-going delivery of planning services within the National Parks. This would follow the example of the Loch Lomond and Trossachs National Park in Scotland where under the National Parks (Scotland) Act 2000 the National Parks are required to establish one or more advisory groups to involve key interests and organisations in the management of the area. In this case the NPA has convened a Planning Forum, which consists of around 30 people from a variety of backgrounds and interests, including property development, renewable energy, tourism and affordable housing, Community Councils and other organisations such RSPB Scotland, the Scottish Council for National Parks and a Housing Association with the purpose of sharing views and experiences of the Planning Service and discussing ideas for its improvement (para 3.9).

Again the purpose of such Advisory Groups in Wales would be to build trust and co-operation between the businesses and communities of the National Parks and the Planning Section of the National Park Authority and to grow understanding of the needs of businesses and communities on the one hand and the purposes of the statutory designated landscapes on the other. This could meet once every six months. These Advisory Groups will only be of value if there is a willingness on both sides to understand the position of the other and if the planning authority, within current financial constraints and legal requirements, seeks to meet concerns that are raised.

It would also be helpful if there was more direct engagement between the NPAs and their constituent Community Councils. As an example, Snowdonia NPA has recently held a successful open day for all their constituent Community Councils explaining the role and activities of the NPA. They have also produced guidance notes for Community Councils on the wording that should be used when making recommendations on individual planning applications so as to avoid any ambiguity.

RECOMMENDATION 11: National Park Authorities and the constituent authorities of AONBs should set targets for the approval of commercial developments in their Corporate Plans. This is illustrated by Pembrokeshire Coast NPA that in its Corporate Plan has a target that 85% of all commercial applications will be approved. This figure is monitored and is being achieved (para 5.26). These targets and the monitoring results need to be clearly advertised.

Partnership working between the planning and socio-economic functions of National Park Authorities and their constituent authorities and between the constituent authorities of AONBs

6.10   The split between the planning functions of the National Park Authorities and the socio-economic functions of their constituent authorities necessitates close partnership working between the two. This has been recognised through all reviews of the National Parks (para 5.15). It might also be assumed that within the constituent authorities of AONBs there is close working between their planning departments and the economic development sections and affordable housing enablers but this is not necessarily the case, as identified in previous studies of Planning and the Rural Economy[28] and as identified in the recent study of Roger Tym and Partners into Planning for Sustainable Economic Renewal[29] which concluded that planning for economic development is more rigid and less responsive than it could be. Although this Roger Tym study was not specific to statutory designated landscapes, it noted the need for stronger links to be forged between land use planning and economic development policies and interventions.

6.11   If closer partnership working is to be achieved between planning and the socio-economic activities of the constituent authorities, it is very important that this partnership working is not purely perfunctory but is based on a common understanding, mutual respect and a desire to find common ground, with solutions that help support the businesses and communities of the statutory designated landscapes while meeting their statutory purposes. This requires that the NPAs and AONB officers / JACs understand the socio-economic needs of their businesses and communities and that economic development officers and affordable housing officers / work within the spirit of the Section 62.2 duty (para 5.14).

6.12   It is also important, in times of economic restraint, that all opportunities for sharing staff and resources are explored. It is therefore recommended that:

RECOMMENDATION 12: Every opportunity should be explored for partnership working between NPAs and their constituent authorities and between the constituent authorities of AONBs, particularly in terms of linking planning functions with the economic development and affordable housing functions, and to achieve resource efficiencies. This should apply to both Forward Planning and Development Management. This is needed to develop common understanding and to maximise resource efficiency.

Forward Planning: There are already considerable examples of partnership working. Pembrokeshire Coast NPA has worked closely with Pembrokeshire County Council to develop the evidence base for their respective Local Plans, for example, co-operating on housing and retail studies. Indeed, in the last round of Unitary Plans the two authorities prepared a Joint Unitary Plan. This had certain advantages including agreeing a spatial strategy that extended beyond the boundary of the National Park (this is not an issue unique to statutory landscapes and equally relates to joint working across local authority boundaries), and ensured co-operation and engagement between the authorities involved. However, it led to accusations that the National Park was not being true to its purposes and led to divisive arguments that sought to play the NPA off against the constituent authority. It ultimately also proved less cost-effective than preparing two complementary plans. Preparing an LDP specifically for the National Park allowed the process to be tailored to the needs of the statutory landscape, with the LDP reflecting the National Park Management Plan, and allowing combined consultation events that dovetailed the two plans together. Looking forward, the interaction between the National Park Management Plan and its delivery in part through the National Park LDP reflects the agenda of Living Wales, with the LDP helping to deliver the ecosystem services identified in the Management Plan.

Running two separate LDPs (one for the National Park and one for Pembrokeshire County) also avoided disagreements over a combined strategy and preferred options that in the last round had been a compromise for both the NPA and the County Council, leading to significant delays in the overall programme of the joint UDP. There remains an important need though, for the NPAs to

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[28] Land use Consultants in collaboration with the University of the West of England and Atlantic Consultants (August 2002).

[29] Roger Tym and Partners (June 2011) Planning for Sustainable Economic Renewal: Research Report to the Welsh Government.

take account of the economic development and affordable housing needs identified by the constituent authority(s).

Overall, it is instructive to look at the Cairngorms National Park in Scotland where there is strong combined working with its five constituent authorities. Despite shared delivery of development management within the National Park it has proved to be of significant benefit to have an LDP drawn up to the boundaries of the National Park (paras 3.58 – 3.60). Having a Local Plan for the National Park area has brought far greater consistency to development management across the whole of the statutory landscape, with all planning decisions now informed by the common policy framework provided by the Local Development Plan. It is for this reason that it is recommended that AONB Management Plans should have a section devoted to planning across the full area of the AONB, adopted as SPG (**Recommendation 5**) and also that National Parks should have a sustainable development strategy (**Recommendation 7**) to inform planning within the Park.

There is of course equal need for liaison between forward planning and the socio-economic functions of the constituent authorities of AONBs to cover not only the AONB but all rural areas within their LPA (see also recommendations in Roger Tym and Partners into Planning for Sustainable Economic Renewal[30]).

Development management and more general liaison: As already noted, where there is a one to one or one to two relationship between an NPA and its constituent authority(s) there is a history of close working, with both sitting on joint working groups /partnerships. There is a growing sense of mutual respect at officer level, and an emerging view that the NPAs are now quite well-engaged with the need for economic development and regeneration, working towards managing a living environment.

Where the NPA has a one to many relationship with its constituent authorities, there may be a case for setting up stronger joint working arrangements, built on mutual respect and the sharing of tasks to reduce overall costs. To minimise the number of additional meetings attended, there would be a case for setting up a Planning Working Group (to which all the chief planning officers of the constituent local authorities are invited) that forms the central contact point between the NPA planning team and the constituent LPAs. This, as in the South Downs National Park (para 3.24), would provide the avenue for finding out about the issues that may affect the National Park, primarily relating to economic development and affordable housing and would be the route through which joint working relationships are agreed. This could include an assessment of whether there would be any resource efficiencies if development management within the main settlements of the National Park passed to the constituent authorities on an agency agreement with the relevant NPAs, as in the Cairngorms National Park (para 3.19).

Issues relating to development management are also considered in **Recommendations 15 – 20**.

RECOMMENDATION 13: Every opportunity is explored for the sharing of staff resources between National Park Authorities and their constituent authorities and indeed between constituent authorities of AONBs both to achieve economies and to allow specialist staff to be employed. Again, there are already many examples of the sharing of resources and these should be developed further. Pembrokeshire Coast NPA shares a minerals planning applications officer with Carmarthenshire County (not a constituent LPA) while Brecon Beacons NPA has a service level agreement with Carmarthenshire for the delivery of minerals planning services. In north Wales, Snowdonia NPA forms part of a consortium of north Wales LPAs that has set up a Joint Minerals Planning Unit in Flintshire to deliver minerals planning on their behalf, and the NPA sits on the Minerals Liaison Group for the wider area.

Similarly, Pembrokeshire Coast NPA jointly funds an affordable housing enabler with Pembrokeshire County Council as does Snowdonia NPA, which jointly funds rural housing enablers with its two constituent local authorities, Gwynedd and Conwy. Brecon Beacons NPA also used to fund a joint affordable housing enabler with Powys County Council although this arrangement has now ceased. Equally, Pembrokeshire Coast NPA and Pembrokeshire County Council have reciprocal arrangement on the sharing of specialist staff, with Pembrokeshire Coast NPA making their tree officer available to the County Council and the County Council making their landscape specialist available to the NPA. Pembrokeshire County Council is now making one of its ecologists

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[30] Roger Tym and Partners (June 2011) Planning for Sustainable Economic Renewal: Research Report to the Welsh Government.

available to the NPA one day a week to advise on individual planning applications. Pembrokeshire County Council planning staff have also been seconded to Pembrokeshire Coast NPA to cover for staff on maternity leave. In addition to offering economies, this sharing of staff helps in the building of trust and mutual support between the two authorities.

In terms of the AONBs, all forward planning functions for Gwynedd and Anglesey are being undertaken by the Gwynedd Joint Planning Policy Unit which is preparing the joint development plan for the two Counties of Gwynedd and Anglesey under a service level agreement. This has two interesting prospects: First, this will be the first development plan in Wales to consider two AONBs within the same plan - Anglesey AONB and Llŷn AONB. Second, the Policy Unit is divided by themes rather than geographically (to encourage bonding between the Anglesey and Gwynedd forward planners that form the Unit), the two main themes are Economy and Environment (allowing exploration of the interplay between these two different areas of interest) and Housing and Community. It will be interesting to see the outcome of this joint and integrated working.

RECOMMENDATION 14: NPA Planning Committees and JACs should invite economic development officers, rural housing enablers and development managers from their constituent authorities to make presentations / attend workshops to discuss the interplay of commercial and community needs with the purposes of statutory designated landscapes. Again the purpose will be to explore the interplay between economic and community development and the purposes of designation, helping develop mutual understanding.

Bringing consistency to Development Management

6.13   There is general concern about the inconsistency in the way that individual planning applications are determined. This relates to all LPAs but especially those that have a high percentage of rural applications (as in National Parks and AONBs) which, by their very nature, tend to be unique (paras 5.16 – 5.17).

6.14   Equally there is a view expressed by rural businesses that the planning system is insufficiently flexible. There are two ways to view flexibility – (a) a relaxation in planning controls but this risks harmful development; or (b) the need for the planning system to take more account of local circumstances and the circumstances of individual businesses. It is suggested that greater flexibility could be exercised for local businesses where there is both a sound understanding of the local economy (**Recommendation 7**) and of the local landscape through a Landscape Character Assessment (**Recommendation 6**).

6.15   It is also recommended that greater consistency will be brought to planning determinations by:

RECOMMENDATION 15: Ensuring that there is a strong and consistent planning framework for each statutory designated landscape that reflects both its landscape importance and socio-economic needs (RECOMMENDATIONS 4, 5 & 7 supported by a sound evidence base (RECOMMENDATION 6).

RECOMMENDATION 16: There should be greater consistency in pre-application advice, with recording of the advice given. Pre-application advice is very important for ensuring good planning applications that take account of relevant planning policies. However, it is very important that there is recording of pre-application enquiries and the advice given to ensure that there is continuity in advice received during the planning determination and so that any changes in advice are clearly signalled during the planning process and reasons for the changes provided. This recommendation was originally made in 2001 but has not been followed through[31]. An example of the approach that could be adopted is illustrated by Gwynedd County Council. Here a meeting note of the pre-application advice given is agreed and signed by both parties as an audit trail of the advice provided.

RECOMMENDATION 17: The right specialists should be available to provide advice on individual planning applications including at the pre-application stage. It is also important that at the pre-application stage applicants receive advice from all necessary

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[31] Land Use Consultants et al (February 2001) Farm Diversification and the Planning System.

specialisms. In the case of larger applications this is best achieved through a Development Team approach or similar supported by clear protocols. This is illustrated, for example, by Powys and Anglesey County Councils. Under this approach a Development Team comes together to provide pre-application advice to the applicant with the team including the case officer (Development Management); Forward Planning; AONB officer (in an AONB); landscape; conservation; highways; and economic development officers; and education and affordable housing enabler where relevant. In the case of NPAs this will involve a Development Team drawn partly from the NPA and partly from the constituent LPA(s). In Monmouthshire, a similar approach is taken under the name of 'New Systems Thinking', where pre-application advice and all the necessary consultations (including with statutory consultees) are undertaken up front, before the planning application is submitted.

In the case of smaller applications it is still important that NPAs / LPAs set up a system to ensure that these still have the benefit of advice on economic development; affordable housing (where relevant); landscape; and the AONB officers' advice and that of other specialisms as relevant, at the pre-application / application stage. This is illustrated by Anglesey County Council where all smaller application enquiries, other than extensions and alterations, are forwarded by email in a standard memo for comment to: forward planning; AONB officer (where relevant); the landscape / ecological co-ordinator; economic development and highways (where relevant).

This highlights that there should be better communication between planning teams and economic development/housing teams (whether in the same authority or not) (para 6.10). Economic development and affordable housing officers should be involved in pre-application discussions, and should be consulted by development management officers when assessing planning applications, as should landscape officers (**Recommendation 18**).

RECOMMENDATION 18: All LPAs with AONBs and NPAs should have access to landscape advice able to comment on smaller applications as well as larger ones. Stakeholders have commented on the lack of landscape expertise within government, from the Welsh Government downwards. This is a particular shortcoming within statutory designated landscapes where stakeholders have commented that there should be greater emphasis on development that is of a sustainable design in keeping with surrounding landscape character.

There may be a case for the development of a Landscape Unit to serve those statutory designated landscapes that do not currently have internal landscape advice, as in the current provision of minerals' planning in south Wales by Carmarthenshire and in north Wales by Flintshire. There is also a case for ensuring that there is an on-going interchange of ideas and support amongst local authority landscape specialists, as in the North Wales Tree and Landscape Officer Group.

RECOMMENDATION 19: All NPAs and LPAs with AONBs should consider if there are other areas of guidance (in addition to RECOMMENDATIONS 3, 5 & 7) that would bring greater consistency to decision-making. Any such guidance should be adopted as SPG. Guidance adopted as SPG can help define the appropriateness of different forms of development in different locations. For example, Pembrokeshire Coast NPA has found that its SPG on renewable energy (of all forms) has enabled the authority to take a much more consistent and pro-active approach to these developments, supporting those that meet identified criteria. In the case of AONBs covering more than one constituent authority such guidance should be adopted as SPG by all the constituent authorities of that AONB.

The emphasis should be on good and innovative design and landscape fit, emphasising that good design does not have to cost more.

RECOMMENDATION 20: With the assistance of the WLGA / NPW and NAAONBs there should be more consistent member and officer training specific to statutory designated landscapes. This should focus on desired outcomes as well as process. This training should be extended to the Chairs of Community Councils. Joint NPA member training works well with all new members required to attend. This includes an initial day of formal training on the planning system followed by site visit training sessions (identifying good and bad examples of development) and regular update sessions. Training also covers enforcement. There would be great benefit though, if this training, including regular updates on desired outcomes within statutory designated landscapes (statutory purposes, landscape fit and appropriate economic development), could be extended to:

- Members of LPAs with AONBs.

- Members of AONB JACs.

- Chairs of Community Councils that lie wholly or partially within a National Park or AONB.

- New and/or inexperienced planning officers within constituent LPAs of AONBs and NPAs.

There would also be great benefit if there was a greater exchange of good practice between all the constituent authorities of AONBs, potentially enabled by WLGA and the NAAONBs.

RECOMMENDATION 21: Reconsider as part of the current enforcement research the ability for LPAs to serve temporary stop notices (implementing the provision in Planning and Compulsory Purchase Act 2004, which has already been implemented in England).

6.16   There is general agreement amongst all stakeholders that lack of enforcement against planning breaches within National Parks and AONBs exacerbates a sense of inconsistency (paras 4.23 and 5.22). Those working within the NPAs and LPAs agree that the enforcement system is not working, and cited barriers such as the complexity of relevant legislation and the enforcement process, LPAs and NPAs not having enough 'teeth' (i.e. powers) and the high cost of enforcement action. However, it is recognised that concerns about enforcement are shared with many LPAs, not just those within AONBs or National Parks.

6.17   The only specific recommendation arising from this research project and discussions with stakeholders was that the legislation relating to enforcement needs to be reviewed at national level to make it easier for LPAs to serve notice, including the use of Temporary Stop Notices as in England.

6.18   As part of the evidence gathering process for the Planning Bill, Welsh Government is currently conducting an enforcement research project, which builds on the earlier enforcement review undertaken in two stages in 2004 and 2006. The Welsh Government conclusions[32] of that two stage review were that there was a consensus that the existing enforcement regime is effective and does not need radical change, but that did not mean that the system could not be improved or have further work done on it. The earlier review highlighted a number of issues where further research would be of benefit, as listed below, and these form the basis of Welsh Government's current enforcement research project:

- Training needs of those involved in the enforcement system and the establishment of fora for the exchange of views and practices.

- Need for changes to the time limits for taking enforcement action.

- The use and usefulness of stop notices and the impact of the compensation provisions on their use.

- Level of fines currently imposed and their effectiveness and guidance provided to magistrates.

- The need for, and possible benefits of, introducing new powers to attach conditions to control an aspect of unauthorised development that is unacceptable in all other aspects, for example a condition to restrict hours of operation.

6.19   It was also noted in the Welsh Government letter accompanying the conclusions of the review that the above research would be extended to include a commitment to carry out research comparing enforcement practices in designated areas such as National Parks and Areas of Outstanding Natural Beauty with those outside such areas. Finally, the Welsh Government letter notes that there will be a need to amend guidance relating to the planning enforcement system, which would be informed by the research and done in due course.

6.20   The outcomes of the current research will clearly be very relevant for enforcement officers within the NPAs and constituent LPAs of AONBs, in particular in relation to the training needs and the use of stop notices, and may help to improve the enforcement system across Welsh LPAs, not just in the National Parks and AONBs.

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[32] Welsh Assembly Government (as was) (December 2009) Planning Enforcement System Review. Conclusions of the Welsh Assembly Government.

Governance

6.21 We are aware that there have been recent suggestions that there should be a single administrative structure for the three National Parks in Wales, as considered in the earlier Edwards' Review (1991). This would seem to run counter to the stated concerns of local stakeholders that they wish to see greater local representation (para 5.23). To move away from the current model would, no doubt, increase the concerns of local people that their interests were being decided remotely (this was clearly stated in the Edwards' review). This is especially the case as the three National Parks lie at a considerable distance from each other. Such proposals also go well beyond the delivery of planning services in the National Parks and therefore cannot be considered in isolation from these wider issues and therefore are not considered further here. Nevertheless, as discussed under other of the recommendations, there is a strong case for the sharing of some activities and support, potentially also including with the constituent authorities of AONBs (as in **Recommendation 18**).

6.22 Turning to local representation, through stakeholder consultation, it has been highlighted that there is poor local community representation on some National Park Authorities, meaning that planning decisions may be decided by people with no direct association with the Park area. Equally it is noted that there is little consistency in the structure and governance of Joint Advisory Committees of AONBs, making it difficult for others to know how to engage with them. It is therefore recommended that:

RECOMMENDATION 22: There should be increased representation of National Park residents amongst the nominated membership of the National Park Authorities. Reflecting the emerging proposals of Defra for the English National Parks, there should be a relaxing of the political balance requirement on local authorities when appointing their members to a National Park Authority. In turn, the constituent authorities should only nominate councillors who represent Wards that are entirely or largely within the National Park so overcoming the current situation where many council nominees sitting on the National Park Authorities may be drawn from Wards at some distance from the National Park.

There is also a case for the Welsh Government to keep an eye on how the pilots are developing in England for the direct election of local community representatives to National Park Authorities, considering the applicability of findings to the Welsh situation (paras 3.7, 3.74).

RECOMMENDATION 23: Through the WLGA and NAAONBs greater consistency should be brought to the structure and governance of AONB Joint Advisory Committees (JACs) ensuring that the high level of local representation is retained and ensuring that all JACs have the opportunity to comment on forward planning proposals and major planning applications within their AONB. Currently some JACs are entirely ineffectual in dealing with planning matters. A potential model is provided by the Wye Valley JAC which includes a Consultation sub-committee that comments on some (major) planning applications and other consultations, meeting about six times a year. The purpose of involving the JAC in this way is to ensure that comment on individual applications properly reflects local views.

One of the concerns of some AONB officers, is that they feel in an invidious position if they offer comments / recommendations that are at variance with the recommendations of the case officer on individual planning applications. However, if it is the collective view of the JAC this barrier is removed (para 5.25).

RECOMMENDATION 24: All NPA and JAC members (see below) should sign a pledge stating that they are supportive of the purposes relevant to the statutory designated landscape and understand the socio-economic duty. This already forms part of the induction package and training of NPA members and is a requirement in Denbighshire where the LPA requires the members of the Clwydian Range and Dee Valley JAC to sign a pledge stating that they are supportive of AONB purposes.

There may also be a case for following the approach adopted in Denbighshire where, if a decision on a delegated application is made which goes against AONB officer or JAC advice, the decision is called in and goes to the Planning Committee for decision, ensuring that the views of the AONB officer / JAC are fully aired.

RECOMMENDATION 25: Where possible the Chair of the JAC or other member(s) of the JAC should also sit on the planning committee ensuring that the interests of the AONB are brought into the debate. An example of this is in Flintshire where the Chair of the AONB Committee also sits on the Planning Committee. This ensures that the interests of the AONB are represented on the committee, without the need for an AONB officer to be present at the committee meeting. Likewise the Head of Planning at Denbighshire Council noted that there is crossover between the members involved in the AONB Committee and the Planning Committee.

Improved performance monitoring

6.23   There is little national reporting on the performance of planning within the statutory designated landscapes. This needs to be addressed so that any criticism of planning in National Parks and AONBs are based on facts. It is recommended therefore that:

RECOMMENDATION 26: There should be monitoring against the following national indicators (para 5.26):

- The % of planning applications approved within National Parks. This information is already collated for all other local authorities on InfoBaseCymru. Poor performing LPA/NPAs should be supported to make improvements.

- The % of commercial (economic) planning applications approved within each National Park and the constituent authorities of the AONBs each year. The definition of 'commercial' activities should be broadly defined to reflect the nature of rural businesses, including signage.

- The quality of the planning outcomes, i.e. the suitability of development taking place within National Parks and AONBs with their statutory landscape purposes. Currently there are no indicators that have been developed for this, or monitoring undertaken to measure outcomes within the NPAs and constituent authorities of the AONBs. This monitoring could be greatly assisted by better use and co-ordination of voluntary monitoring by AONB and National Park Societies.

- The % of planning decisions that (a) have gone against Community Council recommendations (Denbighshire already monitors this) and separately (b) within AONBs, the % of planning decisions that have gone against the recommendation of the JAC / AONB officer.

In addition, as part of the forthcoming Sustainable Development Bill, there may be the opportunity to develop and monitor wider sustainable development indicators.

Appendix 1
Evaluation/Assessment framework

Evaluation/Assessment Framework used in Phase 2 of the study

Assessment questions
Part A: Plan preparation
A1   *Was the Local Development Plan (LDP) prepared and adopted **within 4 years**? (Local Development Plans Wales 2005 para 4.9)*
A2   *What have been/are the reasons for delays in plan preparation/approval?*
A3   *If adopted, has a **review date** been set for the LDP? (Local Development Plans Wales, 2005, para 4.45 states that an authority should complete a full review of its plan every four years.)*
A4   *Did the LDP adhere to its **Delivery Agreement** (which sets out a project plan for the preparation, adoption and review of the plan as well as a timetable)? (PPW 2011 para 2.2.2)*
A5   *Have **Annual Monitoring Reports** been submitted by 31st October each year in connection with the LDP? (PPW 2011 para 2.1.6 and Local Development Plans Wales 2005 para 4.42)*
A6   *Were/are **key stakeholders consulted** early in the plan preparation process? (CCW, AONB officers, landscape, biodiversity and cultural heritage specialists) (The earliest formal consultation stage is the Pre Deposit Plan – Local Development Plans Wales, 2005, para. 4.19 and Figure 1)*
A7   *Were / are comments made incorporated into the Plan? [This will involve asking about consultation through interviews, but also checking any consultation reports prepared following early stages of LDP preparation to see what comments were made and how they were addressed by the LPA]*
A8   *If adopted, did the **inspector** feel that policies for **the statutory designated landscapes were adequately** covered? [This will involve checking the relevant Inspector's Report if the LDP has been through Examination]*
A9   **National parks only** *Was **there close liaison with the housing departments** and committees of the constituent local authorities?*
A10   *How effective was this liaison in terms of the plan preparation and resulting policies? [This will need to be asked through interviews]*
Part B: Plan Policies
B1   **National Parks and AONBs** *Are the **National Park / AONB purposes** clearly **embedded in the vision and overall strategy** for the Park / AONB area?* *To conserve and enhance their natural beauty, wildlife and cultural heritage (both National Parks and AONBs)* *To promote opportunities for public understanding and enjoyment of their special qualities (National Parks only)* *[This will involve checking the LDP Vision, Objectives and Core Strategy, as well as any specific policies relating to the NP or AONB]*
B2   **National Parks only** *Are the **special qualities** of the National Park clearly identified in the Local Plan?*
B3   **AONBs only** *In policies for **development in open countryside**, are there particular criteria relating to the statutory designated landscape?*
B4   **National Parks and AONBs** *Is there clear policy support for the principle that policies should give **greater weight to conserving and enhancing natural beauty**, wildlife and cultural heritage of these areas over other interests? (PPW 5.3.4 and 5.3.6)*
B5   **National Parks and AONBs** *Is there a specific policy **for major developments** that are more national than local in character? (Major developments should not take place within National Parks and AONBs except in exceptional circumstances PPW5.5.6) ['National' in this context means UK.]*

	Assessment questions
B6	**National Parks and AONBs**
	*Is there clear policy support for **the fostering of the economic and social well-being** of local communities within the National Park/ AONB?*
B7	*Is there guidance on how this can be achieved while conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park / AONB? PPW 5.3.4 & 5.3.6,*
B8	**National Parks and AONBs**
	*Is there clear policy support or SPG or other **guidance for promoting or reinforcing traditional character** and local distinctiveness? PPW 4.10.10*
B9	**National Parks and AONBs**
	*Does the **Annual Monitoring Report** show that policies relating to the statutory designated landscape are used frequently in making planning decisions?*
Part C: Development management process	
C1	**AONBs only**
	Are applications within the AONB dealt with in any different way compared to those in the rest of the local authority area?
	If yes, what are the differences?
C2	*Does the NPA/LPA provide **pre application advice?***
C3	*In the case of AONBs, is an AONB officer ever involved in pre application discussions?*
C4	*What format does the pre application advice come in (e.g. website advice, planning surgeries, direct discussions with applicants, provision of information, site visits)?*
C5	*Does the LPA / NPA charge for pre application advice/discussions?*
C6	*Are applicants advised of NP **special qualities or of design guidance** or similar?*
C7	*Is **the standard UK application form** (available through the Planning Portal) used, or is a modified version of it used?*
C8	*Will the NPA / LPA seek the **advice of other specialists** – what are the common specialisms sought?*
C9	*Are **site visits** normally made to application sites?*
C10	**AONBs only:** *In the case of AONBs will the AONB officer ever be present on a site visit? And in what circumstances?*
C11	*Are applications within AONBs / NPs **modified,** and in what circumstances?*
C12	*If an application is modified, is a re-application requested i.e. is the applicant advised to withdraw the application and re-submit?*
C13	*What programme of **member training** is in place re planning determinations?*
C14	*Is there a code of behaviour for Members and Officers, available and complied with? (PWC success criterion)*
C15	*Which **statutory consultees** are involved, when are they consulted and how significant are their comments in relation to determination of the application and appeals?*
C16	*In what circumstances do LPA/NPA officers have **delegated powers** to determine applications within NPs and AONBs (i.e. for what types of planning applications)?*
C17	**AONBs only:** *Do the circumstances or types of planning applications differ for applications outside the AONB?*
C18	*Is there a **high percentage of decisions delegated** to LPA/NPA officers?*
	(PWC success criterion – suggested a high percentage would indicate a high level of trust between Members and officers)
C19	*What percentage of applications within NPs and AONBs determined by the Planning Committee, **go against officer recommendation**?*
C20	**AONBs only:** *Is the percentage different for applications outside the AONB?*
C21	*What is the average **time taken for applications to be determined** within statutory protected landscapes?*
C22	*At what point does the clock start ticking for the statutory timeframe for planning applications to be determined within?*
C23	**AONBs only:** *is this any different to the time taken for applications to be determined outside the statutory designated landscape?*
C24	*What **% of applications in open countryside** within the statutory designated landscape are **approved**?*
	*(**NPI: PLA/002** The percentage of applications for development determined during the year that were approved.)*
C25	**AONBs only:** *is this any different to% approvals outside the statutory designated landscape?*

	Assessment questions
C26	*How does this compare with the % of approvals within rural LPAs?*
C27	*What are the types of **planning condition/ legal agreements** that are typically applied to approvals within the statutory designated landscape?*
C28	*In what circumstances are these typically applied?*
C29	***AONBs only:** is this any different to conditions applied / legal agreements entered into outside the statutory designated landscape?*
C30	*What number of refusals **go to appeal** each year within the statutory designated landscape?*
C31	***AONBs only:** is this any different to the number of appeals outside the statutory designated landscape?*
C32	*How many **appeals** are subsequently **approved** (i.e. go against the LPA's decision)?*
C33	***AONBs only:** is this any different to the patterns outside the statutory designated landscape?*
C34	*Is there a **high success rate at planning appeals** with no costs being awarded against the NPA/LPA? (PWC success criterion) (**NPI: PLA/003** The percentage of appeals determined that upheld the authority's decision in relation to planning application decisions and enforcement notices.)*
C35	*Is there a **formal complaints procedure** – are all complaints logged and how are they acted upon?*
C36	*Were there **any justified criticisms** arising from the authority's formal complaints procedure relating to the planning application process within the statutory designated landscape? (PWC success criterion – suggested that LPA monitoring against former Best Value target 205 'Quality of Planning Services' would show the percentage of applicants satisfied with the service received.)*
	Part D: Example planning applications
D1	*Application reference number and name*
D2	*Date of application*
D3	*Type of application – for what? Size?*
D4	*Location – statutory designated landscape and more precise location?*
D5	*Outline or full?*
D6	*Did **pre-application discussions** take place between the applicant and the AONB officer / NPA/LPA officer in relation to:* • *the purpose(s) of the statutory designated landscape and conserving its special qualities / key characteristics?* • *design guidance and promoting traditional character and local distinctiveness* • *other*
D7	***Who prepared the application** - the applicant or other?* *[State 'other' e.g. professional planner]*
D8	*Does the **application adequately describe the development**, allowing likely impacts to be assessed?*
D9	*Does it identify that it is in a statutory designated landscape?*
D10	*Does it identify the likely environmental sensitivities of the application e.g. in relation to landscape, wildlife and cultural heritage?*
D11	*Did any **specialist advisors** assist the LPA in making a recommendation to permit/decline planning permission?*
D12	*What disciplines did they cover, what was the significance of their advice in the decision, and any subsequent appeals? (In particular, was specialist landscape advice sought, and how significant was the advice in the decision?)*
D13	*Was a site visit made by the **planning officer**?*
D14	*Was he / she accompanied by any specialists? Who?*
D15	*Were any **modifications** required of the planning application relating to the special status of the statutory designated landscape?*
D16	*What were these?*
D17	*How were these dealt with – was a new planning application required?*
D18	*What number of **letters of support and objection** were received?*
D19	*What were the main reasons for support and from whom?*

	Assessment questions
D20	What were the main reasons for objection and from whom?
D21	Which **statutory consultees** were involved, when were they consulted and how significant were their comments in relation to determination of the application and appeals?
D22	What was the **officer's recommendation** for determination? [Need to obtain the officer's report]
D23	**Who determined the application** - Head of Planning or the Planning Committee?
D24	What was the **planning decision?**
D25	What were the **main reasons given for this decision** relative to the statutory designated landscape?
D26	What was the **time taken** to determine the application? (Was it within the statutory timeframe?)
D27	What were the reasons for any delays?
D28	If approved, what **conditions / legal agreement** were applied that related to the special status of the statutory designated landscape?
D29	If refused due to the purpose(s) of the statutory designated landscape, did the applicant **appeal** the decision?
D30	What was the result of the appeal?
D31	If approved, what reasons did the inspector give for the approval? [Need to obtain the Inspector's report]
Part E: Enforcement	
E1	Is there an **enforcement charter** in place which sets out the LPA's responsibilities and how they will record and deal with breaches of planning control, including the public's role in identifying possible breaches (as in the Cairngorms)
E2	If there is no charter in place is there other standard / internal guidance on enforcement?
E3	Are regular **monitoring reports** produced on reported breaches of planning – failure to comply with conditions / illegal developments?
E4	How are planning breaches identified?
E5	**AONB LPAs only:** Is there any different pattern within the statutory designated landscape?
E6	How many planning breaches per year are there within the statutory designated landscape?
E7	What are the most common forms of planning breach?
E8	**AONB LPAs only:** is the pattern any different within and outside the statutory designated landscape?
E9	Are s.215 Notices for tidying an area up served more regularly within the NPs and AONBs than by other LPAs / outside the AONB?
E10	Is **enforcement action** taken where necessary, and are cases resolved within 12 weeks?
E11	What **enforcement action** is taken in the case of planning breaches – reversal of the development / retrospective planning/ enforcement of the conditions / other?
E12	Is **advice/consultation** sought during the enforcement process from relevant consultees (including AONB team)?

Appendix 2
Questionnaire sent to Individual Planning Applicants

Questionnaire: Reviewing the Delivery of Planning Services in Welsh National Parks and AONBs

Name   **Application number**

1) Overall, how would you rate your experience of applying for planning permission within a National Park or Area of Outstanding Natural Beauty (AONB)? (1 = extremely poor, 10 = extremely good)

1   2   3   4   5   6   7   8   9   10

Please explain your answer

2a) Did you refer to policies in the adopted local plan for guidance when preparing your application?

☐Yes   ☐No   ☐Not sure/can't remember

2b) Were you advised of any design guidance or similar, that applies to the relevant AONB or National Park, to inform your application?

☐Yes   ☐No   ☐Not sure/can't remember

3) Did you feel that the National Park or AONB designation had a bearing on how your application was dealt with by the local planning authority?

☐Yes   ☐No   ☐Not sure/can't remember

Please explain your answer

4a) Did you request any pre-application advice from the local planning authority?

☐Yes   ☐No   ☐Not sure/can't remember

4b) If yes, what format did this come in?

☐Letter   ☐E mail

☐Verbally over the phone   ☐In person via a drop in session or similar

☐In person via a site visit   ☐Other (please specify) _____

☐Not sure/can't remember   ☐N/A

4c) Was the pre-application advice that was provided helpful?

☐Yes   ☐No   ☐Not sure/can't remember   ☐N/A

Please explain your answer

4d) Did the pre-application advice identify issues specific to the AONB/National Park designation?

☐Yes ☐No ☐Not sure/can't remember ☐N/A

If yes, please explain your answer.

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5) AONBs ONLY: Were you aware of the AONB officer being involved in any stage of your application?

☐Yes ☐No ☐Not sure/can't remember ☐N/A

6) Were you aware of a site visit having been undertaken by the local planning authority?

☐Yes ☐No ☐Not sure/can't remember

7a) Which parts of the planning system do you think work well in your area?

☐Planning policy ☐Pre-application advice

☐Processing applications ☐Appeals

☐Enforcement ☐How planning applications are determined

☐Time taken to determine applications ☐Nature of conditions attached to approvals

☐Other (please specify) _____

Please explain your answer

7b) Are there any aspects of the planning system in your area that you think need improving?

☐Planning policy (e.g. the Local Plan) ☐Pre-application advice available to applicants

☐Processing applications ☐Appeals by applicants against decisions

☐Enforcement on non-authorised development ☐How planning applications are determined

☐Time taken to determine applications ☐Nature of conditions attached to approvals

☐Other (please specify) _____

Please explain your answer

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8) Are there any general comments that you'd like to make? (Please continue on another sheet if necessary)

Appendix 3
Questionnaire sent to Community Councils

Questionnaire: Reviewing the Delivery of Planning Services in Welsh National Parks and AONBs

Community Council:

National Park/AONB:

1) Has your Community Council participated in consultations for the Local Development Plan, particularly in relation to the relevant National Park or Area of Outstanding Natural Beauty (AONB) designation?

☐Yes

☐No

☐Not sure

2) How well do you feel that the Local Development Plan contributes to achieving the purposes[1] of the relevant National Park or AONB? (1 = not at all, 10 = extremely well)

1   2   3   4   5   6   7   8   9   10

Please explain your answer

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3) Do you feel that the National Park or AONB designation has a significant bearing on how planning applications within the relevant designation are dealt with by the local planning authority?

☐Yes   ☐No   ☐Not sure

Please explain your answer

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4) Are there any commonly arising issues that your Community Council is aware of in relation to planning applications in the relevant National Park or AONB?

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5) If you have any involvement with the enforcement process, how would you rate this particular aspect of the planning system? (1 = very poor, 10 = excellent)

1   2   3   4   5   6   7   8   9   10

☐N/A – we do not have any involvement with enforcement.

Please explain your answer

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[1] Note that for National Parks these purposes are (a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas and (b) promoting the opportunities for the understanding and enjoyment of the special qualities of those areas by the public. When National Parks carry out these purposes they also have the duty to seek to foster the economic and social well-being of local communities within the National Parks. In AONBs, the primary purpose of designation is to conserve natural beauty.

6) Overall, how well do you feel that planning services are delivered in relation to the relevant National Park or AONB designation? (1 = not at all, 10 = extremely well)

1   2   3   4   5   6   7   8   9   10

Please explain your answer

7a) Which parts of planning service delivery do you think work well in your area?

☐ Planning policy   ☐ Pre-application advice

☐ Processing applications   ☐ Appeals

☐ Enforcement   ☐ How planning applications are determined

☐ Time taken to determine applications   ☐ Nature of conditions attached to approvals

☐ Other (please specify) _____

Please explain your answer

7b) Are there any aspects of planning service delivery in your area that you think need improving?

☐ Planning policy   ☐ Pre-application advice

☐ Processing applications   ☐ Appeals

☐ Enforcement   ☐ How planning applications are determined

☐ Time taken to determine applications   ☐ Nature of conditions attached to approvals

☐ Other (please specify) _____

Please explain your answer

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8) Are there any general comments regarding the delivery of planning services that you'd like to make? (Please continue on another sheet if necessary)

Appendix 4
Status of LDPs in the national parks and AONBs, and range of AONB-specific policies in development plans

Table 6.1: Status of Local Development Plans in the Welsh National Parks and AONBs

Statutory Designated Landscape	Relevant planning authority(ies)	Status of UDP and/or LDP
Pembrokeshire Coast National Park	Pembrokeshire Coast National Park Authority	LDP adopted September 2010.
Snowdonia National Park	Snowdonia National Park Authority	LDP adopted July 2011.
Brecon Beacons National Park	Brecon Beacons National Park Authority	LDP nearing adoption – Focussed Changes consultation took place in late 2011.

UDP (2007) was approved but not adopted.

Current planning framework therefore consists of:

i) Adopted Gwent Structure Plan (March 1996)

ii) Mid Glamorgan County Structure Plan: Approved Plan Incorporating Proposed Alterations No.1 (September 1989)

iii) Powys County Structure Plan (replacement) (February 1996)

iv) Dyfed Structure Plan (including Alterations No.1) (November 1990)

v) West Glamorgan Structure Plan (Review No.2) (February 1996)

vi) Brecon Beacons National Park Authority Local Plan (May 1999)

Given that a number of these documents are now out of date, the National Park Authority has approved the UDP for use for development management purposes and considers the UDP to carry considerable weight over the documents listed above. |
| Clwydian Range and Dee Valley AONB | Flintshire County Council | UDP was adopted in September 2011.

Yet to begin production of LDP – this will be produced to replace the UDP which runs to 2015. |
| | Denbighshire County Council | UDP was adopted in 2002.

LDP is nearing adoption – currently undergoing examination, with an additional period of consultation on additional sites and additional hearings to be carried out with Inspectors later in 2012. |
| | Wrexham County Borough Council[33] | UDP was adopted in 2005.

LDP was submitted for examination in September 2011, but withdrawn in March 2012 due to fundamental |

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[33] Note that the status of Wrexham's UDP and LDP has been included in this table for the final report, but was not reviewed during the study as it commenced prior to the extension of the Clwydian Range AONB into Wrexham.

Statutory Designated Landscape	Relevant planning authority(ies)	Status of UDP and/or LDP
		concerns raised by the Inspector. The Council are currently awaiting formal confirmation from the Welsh Government about which stage of Plan preparation they will have to return to before they can proceed.
Gower AONB	City and county of Swansea	UDP was adopted in 2008. LDP preparation process has started and consultation on the LDP Vision, Objectives and Strategic Options commenced on the 23rd July, 2012[34].
Llŷn AONB	Gwynedd Council	UDP was adopted in 2009. Joint LDP being produced with Anglesey Council; this is currently at an early stage, with the Vision Objectives and Strategic Options consulted on late 2011-January 2012.
Ynys Môn/Anglesey AONB	Isle of Anglesey County Council	UDP reached inquiry stage in 2004 but was withdrawn in 2005 in order to move to LDP system. LDP reached Pre-Deposit stage but was withdrawn in December 2010 in order to prepare a Joint LDP with Gwynedd Council. This is currently at an early stage, with the Vision Objectives and Strategic Options consulted on late 2011-January 2012.
Wye Valley AONB	Monmouthshire County Council	UDP was adopted in 2006. Deposit LDP was consulted on in late 2011, and underwent consultation on alternative sites December 2011-February 2012, and are now preparing for the next stage, submission to Welsh Government.

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[34] Note that this LDP has not been reviewed as it was not available at the time at which this task was undertaken during Phase 2. Only its status has been updated in this table for the final report.

Appendix 5
SPG and other guidance available in National parks and AONBs

Table 6.2: Supplementary Planning Guidance and other Guidance available in National Parks and AONBs

Local Authority	Adopted SPGs and other guidance
National Park Authorities	
The three National Parks share a **Sustainable Design Guide** (Spring 2009) which promotes better design and construction techniques that could help lower harmful emissions whilst also offering economic and social benefits.	
Brecon Beacons	UDP Guidance Note Policies ES26 & ES27 Replacement of Dwellings and Extension of Dwellings in the Countryside (Sept 2008).
Snowdonia	**Draft SPGs:** Nature Conservation and Biodiversity (Sept 2011); Landscape of Eryri (Sept 2011) **–** *a landscape character assessment of the National Park.* **Adopted SPG:** General Development Considerations (Sept 2011); Planning and the Welsh Language (Sept 2011); Affordable Housing (Sept 2011). **Design leaflets**: Some 25 leaflets on all aspects of building design from design in the open countryside to specific leaflets on slate roofs and windows.
Pembrokeshire Coast	Affordable Housing (March 2011); Loss of Hotels and Guest Houses (June 2011); Landscape Character Assessment (June 2011); Historic Environment (Archaeology) (June 2011); Renewable Energy (October 2011); Conservation Area Proposals (October 2011).
Constituent authorities of the AONBs	
Flintshire Council (Clwydian Range and Dee Valley AONB)	Local Planning Guidance Note No. 10: New Housing in the Open Countryside (Adopted by Council (April 2006). Plus other SPGs of which the most relevant to the AONB are likely to be: Extensions and Alterations to Dwellings; Landscaping; Conversion of Rural Buildings; Listed Buildings; Conservation Areas; Nature Conservation and Development; Affordable Housing.
Denbighshire Council (Clwydian Range and Dee Valley AONB)	Residential Development Design Guide (March 2005); Householder Development Design Guide (October 2005) Plus a large range of other SPGs of which the most relevant to the AONB are likely to be: Extension to Dwellings; Landscaping New Developments; Agricultural and Forestry Workers' Dwellings; Infill Housing in the Countryside; Conservation Areas; Listed

Local Authority	Adopted SPGs and other guidance
	Buildings; Archaeology; Conversion of Rural Buildings; Nature Conservation and Species Protection; Static Caravan and Chalet Development; and Affordable Housing.
Isle of Anglesey Council (Ynys Môn/Anglesey AONB)	Design in the Urban and Rural Environment SPG. This SPG is made up of 32 Guidance Notes, with Guidance Note 30 covering development in the AONB.
Gwynedd Council (Llŷn AONB)	Building New Housing in the Countryside; Affordable Housing and New Housing in Rural Areas; Holiday Accommodations.
Swansea City and County Council (Gower AONB)	The Council has a wide range of SPG. Those post UDP adoption likely to be relevant to the Gower AONB are: Lighting Scheme Guidance for Gower Area of Outstanding Natural Beauty; the Conversion of Rural Buildings; Draft Gower AONB Design Guide.
Monmouthshire Council (Wye Valley AONB)	Local Biodiversity Action Plan: Biodiversity and Development (2005); Policy H7 Conversion / Rehabilitation of Buildings in the Countryside for Residential Use (November 2006); Affordable Housing (March 2007); Policy H13, H15: Replacement Dwellings and Extensions to dwellings in the Countryside (October 2007); Wye Valley AONB Management Plan (October 2009).

John Griffiths AC /AM
Y Gweinidog Diwylliant a Chwaraeon
Minister for Culture and Sport

Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref

Ein cyf/Our ref

I : Cadeiryddion

Awdurdodau'r tri Pharc

Cenedlaethol

/⎯Mai 2013

Annwyl   pawb

Dosbarthiad Grant Strategol 2013-14

Mae fy swyddogion eisoes wedi rhoi gwybod i chi am yr adnoddau sy'n cael eu neilltuo gan Lywodraeth Cymru i gefnogi'ch gwaith chi yn 2013 – 2014. Mae yna copi yn ynghlwm yn Atodiad 1. Diben y llythyr hwn yw tynnu sylw at y meysydd y mae Gweinidogion Cymru yn credu y dylech eu targedu fel blaenoriaeth yn ystod y flwyddyn hon.

Dwy'n credu dylai'r Parciau Cenedlaethol fod yn enghreifftiol o ddatblygu cynaliadwy; tirluniau gweithiol a byw gyda economi gwledig dirgrynol, ecosystemau a bioamrywiaeth ffyniannus, ac adnoddau adloniant eang. Fel Awdurdodau Parciau Cenedlaethol rwy'n disgwyl iddi'ch arddangos arweinyddiaeth drwy gyflawni math amodau, a chymryd camau hyderus pan mae'n dod i reoli newid tirwedd gadarnhaol er budd pobol a'r amgylchedd.

Bydd y Datganiad Polisi ar gyfer Tirweddau Gwarchodedig newydd yn traethu llun clir tros ddyfodol dirwedd ddynodedig yng Nghymru wrth roi datblygu cynaliadwy wrth galon dehongliad cyfoes o bwrpasau a dibenion y dynodiadau yma. Rwy'n falch bod awdurdodau'r parciau hyn wedi dangos brwdfrydedd i fod yn rhan o'r broses o ddatblygu'r Datganiad Polisi a'r amcanion cysylltiedig, a fydd yna gyfle bellach i chi ac unrhyw un a diddordeb i gyfrannu cyn caiff ei gyhoeddi yn hwyrach yn y flwyddyn.

Yn ddiweddar sefydlwyd u Comisiwn ar Lywodraethu a Darparu Gwasanaethau Cyhoeddus i ystyried effeithiolrwydd gwasanaethau cyhoeddus yng Nghymru a siwt gallant ei gwella. Fe fydd yn asesu sut mae'r trefniadau cyfredol pob gwasanaeth datganoledig yn cyflawni anghenion Cymru nawr ac yn y dyfodol a chynnig model o drefn lywodraethol wasanaeth cyhoeddus a thraddodi i Gymru. Fe fyd hefyd yn cysylltu yn eang ac yn ystyried cydarwaith gyda gwasanaethau ni ddatganolwyd. Bydd gwaith y Comisiwn yn ddefnyddiol drwy roi cyd-destun ehangach i'r adolygiad, ac felly y bwriad yw aros am yr adroddiad yma cyn rhychwantu'r adolygiad o Awdurdodau Parciau Cenedlaethol.

Mewn amser bydd y datganiad polisi yn cael ei fewnosod tu fewn i arweiniant a dull Cynlluniau Rheoli'r Parciau Cenedlaethol. Yn y cyfamser dwy'n disgwyl i chi ddilyn y blaenoriaethau a gytunwyd yn y cynlluniau yna, tra ystyried y llun a chanlyniadau ei fydd yn cynnwys a'r blaenoriaethau penodol a gaiff ei thraethu isod.

Wedi'i argraffu ar bapur wedi'i ailgylchu (100%)   *Printed on 100% recycled paper*

Mae'n hynod bwysig, yn yr hinsawdd ariannol anodd sydd ohoni, fod sefydliadau gwahanol yn cydweithio i wneud y mwyaf o'u sgiliau, adnoddau ac arbenigeddau ac i ddatblygu syniadau arloesol. Hoffwn weld lefel newydd o weithio mewn partneriaeth dros y flwyddyn sydd i ddod; nid yn unig rhwng Awdurdod Parciau Cenedlaethol ond hefyd trwy gefnogi'r gwaith integredig ar lefel lleol, rhanbarthol a chenedlaethol i fynd i'r afael â materion gwaelodol fel trechu tlodi a chynyddu cynaliadwyedd. Rwy'n disgwyl i'r Awdurdodau gydweithio mewn ffordd adeiladol gyda'u hawdurdodau lleol ar faterion fel datblygu economaidd, tai, trafnidiaeth, treftadaeth ddiwylliannol ac addysg.

Mae Llywodraeth Cymru yn rhoi pwyslais mawr ar fynd i'r afael â thlodi. Mai yna cyswllt uniongyrchol rhwng ymrwymiad cenedlaethol i gynaladwyedd, lliniaru tlodi, ymdrin ag achos anghydraddoldeb, cefnogi cymdeithas sifil a phwrpas ac uchelgais y parciau cenedlaethol. Rwy'n awyddus i weld Awdurdodau'r Parciau yn gweithio gyda phartneriaid yn lleihau'r bwlch rhwng teuluoedd sy'n byw ar incwm isel a'r teuluoedd sy'n fwy cefnog o ran iechyd, sgiliau addysg a chanlyniadau economaidd. Mae Awdurdodau'r Parciau eisoes yn weithgar iawn yn hybu cynhwysiant cymdeithasol ond nid da lle gellir gwell a gellir gwneud mwy i annog cymunedau i gyfrannu at brosiectau amgylcheddol mewn ardaloedd o amddifadedd. Drwy wneud hyn, byddwch yn cyfrannu at yr agenda o fynd i'r afael â thlodi yng Nghymru.

Gwella hawliau tramwy cyhoeddus a chynyddu hawliau mynediad, yn enwedig i blant a theuluoedd yw un o brif ymrwymiadau Llywodraeth Cymru yn ystod y Cynulliad hwn. Rwy'n disgwyl i Awdurdodau'r Parciau barhau i weithio â'r awdurdodau lleol i ddod o hyd i ffyrdd i wella mynediad at y Parc Cenedlaethol i bob sector yn y gymdeithas a meithrin cysylltiadau â sefydliadau y tu allan i'r Parciau er mwyn cyflawni'r amcan hwn. Hefyd rwy'n awyddus i weld Awdurdodau'r Parciau'n cymryd rhan gadarnhaol yn ein gwaith o ddatblygu mynediad a darparu mannau gwyrdd yn unol â darpariaethau Bil yr Amgylchedd.

Mae llawer o gyfoeth ac amrywiaeth treftadaeth ddiwylliannol Cymru i'w gael o fewn ein Parciau Cenedlaethol. Mae gennych chi ran bwysig i'w chwarae wrth warchod yr adnodd hwn a'i drosglwyddo i'r rheini sy'n ymweld â'ch Parc chi. Efallai bod cydweithio mewn partneriaeth â sefydliadau treftadaeth eraill yn un ffordd o gynyddu effaith yn y maes hwn.

Fe hoffwn weld o dan y faner "Cynnal Cymru Fyw" ymagwedd ymglymedig i reolaeth yr amgylchedd naturiol sy'n gwella iechyd ecosystemau. Dylai'r gwaith sy'n cael ei wneud yn y Parciau Cenedlaethol, yn enwedig gan Awdurdodau'r Parciau, cael ei weld yn enghreifftiol drwy edrych dros a gwelliant yr amgylchedd naturiol. Dylai'r Awdurdodau Parciau Cenedlaethol parhau i gymryd rhan fywiog yn cymryd malen egwyddorion "Cynnal Cymru Fyw" a chyfrannu i drafodaethau ynghyn ai ddatblygiad a'i gweithrediad.
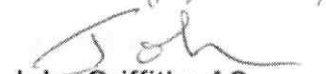
Mae gwasanaeth cynllunio effeithiol, tryloyw a chyson yn allweddol i gael cydbwysedd rhwng anghenion economaidd-gymdeithasol cymunedau lleol, gwarchod y tirwedd a'r amgylchedd naturiol. Mae gwneud penderfyniadau'n unol â pholisi datblygu cyfredol a 'Pholisi Cynllunio Cymru' yn hanfodol ar gyfer gwneud y gwasanaeth rheoli datblygiadau yn wasanaeth agored ac effeithlon, sy'n gwneud penderfyniadau cadarn sy'n gyson â'i gilydd ac sy'n rhoi hyder i fusnesau a chymunedau o fewn ffiniau'r Parciau. Dylai hyn fod yn adlewyrchiad o bwysigrwydd cynllunio yn y broses ehangach o ddatblygu economaidd, darparu tai fforddiadwy a chefnogi bioamrywiaeth.

Rwy'n falch o'r gwaith sy'n cael ei wneud gennych i ddatblygu'ch cynlluniau datblygu lleol, sy'n rhoi fframwaith ar gyfer defnydd tir cynaliadwy ar draws yr Awdurdod. Cyn gynted â bod y cynlluniau'n cael eu rhoi ar waith, mae'n hanfodol eu monitro er mwyn sicrhau eu bod yn aros yn gyfredol ac yn ymateb i'r prif faterion yr ydych chi am fynd i'r afael â hwy.

Rwy'n disgwyl i chi, fel awdurdodau cynllunio lleol eich ardal, ddal ati i wella'ch gwasanaethau cynllunio, gan gynnwys rhoi penderfyniad ar gais cynllunio o fewn yr amserlen sydd wedi ei bennu ar gyfer y cais hwnnw, lleihau unrhyw ôl-groniadau a chymryd y camau gorfodi mewn achosion cynllunio pan fo gofyn am hynny.

Yn unol â threfniadau cyfredol, rwy'n disgwyl i chi drefnu bod Llywodraeth Cymru yn cael adroddiadau bras ar sut y mae pethau'n symud yn eu blaen bob chwe mis.

Rwy'n hapus i gymryd lan fy mhortffolio newydd, rwy hefyd wedi cadw cyfrifoldeb am y Parciau Cenedlaethol. Mae diwylliant Cymru wedi ei wreiddio yn ei thirwedd, ac mae Cymry yn aml yn mynegi ei hunaniaeth drwy ei chysylltiadau gyda mannau sy'n bwysig iddynt. Rwy'n edrych ymlaen at gydweithio â chi dros y flwyddyn nesaf.

Yn gywir,

John Griffiths AC

Gweinidog Diwylliant a Chwareaeon

Minister for Culture and Sport

John Griffiths AC /AM
Gweinidog Diwylliant a Chwaraeon
Minister for Culture and Sport

Eich cyf/Your ref
Ein cyf/Our ref

To : The Chairs of the 3
National Park Authorities

10 May 2013

Dear Sirs,

Strategic Grant Allocation 2013-14

My officials have already advised you of the resources being made available by the Welsh Government in support of your work in 2013 – 2014. A copy of that advice is attached at Annex 1. The purpose of this letter is to highlight the priority areas on which the Welsh Ministers would wish to see these resources being targeted in the year ahead.

It is my view that the National Parks should be exemplars of sustainable development; living, working landscapes with vibrant rural economies, thriving ecosystems and biodiversity, and extensive recreation opportunities. As the National Park Authorities I expect you to be demonstrating leadership in achieving such conditions, and taking confident strides when it comes to managing positive landscape change for the benefit of people and the environment.

The new Policy Statement for Protected Landscapes will set out a clear vision for the designated landscapes in Wales that puts sustainable development at the heart of a contemporary interpretation of the purposes and duties of these designations. I am pleased that the park authorities have shown an eagerness to be involved in the development of the policy statement and related outcomes, and there will be further opportunity for you, and for other interested parties, to input before it is finalised later this year.

The Commission on Public Service Governance and Delivery has recently been established to consider how effective public services are in Wales and how they could be improved. It will make an assessment of how far the current arrangements for all devolved services meet the needs of Wales now and for the future and propose a model of public service governance and delivery for Wales. It will also be engaging widely and considering the interaction with non devolved services. As you know it is my intention to review the governance arrangements for the National Parks to reflect on matters such as the nature of the accountability to Welsh Ministers, the administration of the authorities, and links to other bodies such as Natural Resources Wales. The work of the Commission will overlap this review, and so it is my intention to wait for its report, which should be published by the end of 2013, before scoping the review of National Park Authorities.

In time, the policy statement will become embedded into the guidance and approach to the National Park Management Plans that you are required to produce. In the meantime, I

expect you to pursue the priorities agreed in those plans, whilst having regard to the vision and outcomes that it will contain, and the specific priorities set out below.

In these difficult financial times, it is extremely important that organisations work together to maximise skills, resources, expertise and develop new and innovative ideas. I would like to see a new level of partnership working achieved during the coming year; not only between the National Park Authorities, but also by supporting integrated working at local, regional and national levels to address fundamental issues such as tackling poverty and increasing sustainability. I expect Park Authorities to work constructively and collaboratively with their constituent local authorities on cross-cutting issues including economic development, housing, transport, cultural heritage and education.

The Welsh Government is placing a strong emphasis on tackling poverty in Wales. There is a direct link between the national commitment to sustainability, the alleviation of poverty, addressing the root causes of inequality, and supporting civil society, and the purpose and ambition for the national parks. I am keen to see Park Authorities working with others on reducing the gaps that exist between families living in low-income households and their more affluent peers in terms of health, education, skills and economic outcomes. The Park Authorities are already very active in promoting social inclusion but I think more could be done to improve community participation in environmental projects in deprived areas. In so doing, you will be making a contribution to tackling the poverty agenda in Wales.

A key commitment for the Welsh Government this Assembly term is to improve public rights of way and widen access opportunities, in particular for children and families. I expect the Park Authorities to continue their work with the constituent local authorities to find ways of increasing access to the National Park for all sectors of society making linkages to organisations outside the Parks to achieve this objective. I am also keen to see the Park Authorities participate positively in our work to develop access and green space provision in the Environment Bill.

National Parks contain much of Wales' rich and varied cultural heritage and you have an important role in protecting this resource and interpreting it for your visitors. Working in partnership with other heritage organisations can be one way to maximise the impact you can make in this area.

I would like to see under the banner "Sustaining a Living Wales" a more integrated approach to managing the natural environment that improves the health of ecosystems. The work carried out in the National Parks, and in particular by the Park Authorities should be seen as exemplar in the care and improvement of the natural environment. The National Park Authorities should continue to take an active role in taking forward the principles behind "Sustaining a Living Wales" and to contribute to the discussions on its development and implementation.

An effective, transparent, consistent and enabling planning service is key to balancing the socio-economic needs of local communities, the protection of landscape, and the natural environment. Taking decisions in accord with an up-to-date development plan and 'Planning Policy Wales', is crucial to making development management an open, efficient service, providing sound, consistent decisions in which business and communities in the Parks can have confidence. This should reflect the important role of planning in securing appropriate economic development, the provision of affordable housing and supporting biodiversity.

I am pleased with the progress made by the Park Authorities in developing your local development plans, which provide a framework for sustainable land use planning across the Park Authority. Once plans are adopted, annual monitoring is essential to ensure they remain up-to-date and responsive to the key issues you are seeking to address.

As local planning authorities for your areas, I expect you to continue to secure improvements in your planning services, including determining planning applications within the specified timescales, reducing any backlogs, and taking action on planning cases where enforcement action is necessary.

In line with the current arrangements, I expect you to arrange for the Welsh Government to receive brief six monthly reports on progress.

I am pleased that in taking up my new portfolio, I have retained responsibility for the National Parks. Welsh culture in particular is rooted in its landscape, and Welsh people often express their identity through their connection with places that are important to them. I look forward to working with you in the coming year.

Yours,

John Griffiths AM
Gweinidog Diwylliant a Chwareaeon
Minister for Culture and Sport

January to March 2013	PLANNING AUTHORITIES IN WALES

SPEED OF DETERMINING PLANNING APPLICATIONS	
Planning Authority	**Percentage decided within 8 weeks of receipt**
Blaenau Gwent	85
Bridgend	83
Neath Port Talbot	80
Cardiff	78
Vale of Glamorgan	76
Ceredigion	75
Merthyr Tydfil	73
Pembrokeshire	73
Carmarthenshire	72
Rhondda Cynon Taf	72
Wrexham	72
Gwynedd	72
Pembrokeshire Coast National Park	71
Denbighshire	70
Isle of Anglesey	70
Conwy	69
Newport	68
Snowdonia National Park	67
Caerphilly	67
Swansea	66
Powys	64
Brecon Beacons National Park	63
Flintshire	60
Torfaen	57
Monmouthshire	50
WALES AVERAGE	**71**

Source: Survey of Welsh Local Planning Authorities April 2013.

RENEWABLE ENERGY SCHEMES (PLANNING AND LISTED BUILDING CONSENTS) DETERMINED BETWEEN APRIL 2007 AND MARCH 2011 BY THE NATIONAL PARK AUTHORITIES IN WALES

2007 – 2008										
	SNOWDONIA	Granted	Refused	PEMBROKESHIRE	Granted	Refused	BRECON	Granted	Refused	TOTAL
WIND	2	2	-	3	2	1	2	1	1	7
SOLAR	8	8	-	17	14	3	2	2	-	27
PHOTOVOLTAIC	-	-	-	-	-	-	-	-	-	-
HYDRO	-	-	-	-	-	-	1	1	-	1
GEOTHERMAL	-	-	-	1	1	-	1	1	-	2
OTHER	-	-	-	-	-	-	-	-	-	-
TOTAL	10	10	-	21	17	4	6	5	1	37

* Excludes pre-application determination, screening opinion and withdrawn applications.
* Some applications indicate more than one type of generation, in these cases only one has been counted.

2008 - 2009

	SNOWDONIA	Granted	Refused	PEMBROKESHIRE	Granted	Refused	BRECON	Granted	Refused	TOTAL
WIND	-	-	-	4	1	3	2	1	1	6
SOLAR	1	1	-	12	11	1	3	3	-	16
PHOTOVOLTAIC	1	1	-	-	-	-	-	-	-	1
HYDRO	-	-	-	-	-	-	2	2	-	2
GEOTHERMAL	-	-	-	-	-	-	-	-	-	-
OTHER	-	-	-	-	-	-	-	-	-	-
TOTAL	2	2	-	16	12	4	7	6	1	25

2009 - 2010

	SNOWDONIA	Granted	Refused	PEMBROKESHIRE	Granted	Refused	BRECON	Granted	Refused	TOTAL
WIND	2	2	-	2	2	-	3	1	2	7
SOLAR	9	8	1	13	13	-	1	1	-	23
PHOTOVOLTAIC	1	1	-	-	-	-	-	-	-	1
HYDRO	-	-	-	-	-	-	-	-	-	-
GEOTHERMAL	-	-	-	-	-	-	-	-	-	-
OTHER	-	-	-	-	-	-	1	-	1	1
TOTAL	12	11	1	15	15	-	5	2	2	32

2010 - 2011	SNOWDONIA	Granted	Refused	PEMBROKESHIRE	Granted	Refused	BRECON	Granted	Refused	TOTAL
WIND	3	2	1	2	2	-	2	1	1	7
SOLAR	1	1	-	9	9	-	4	3	1	14
PHOTOVOLTAIC	1	1	-	-	-	-	2	2	-	3
HYDRO	4	3	1	-	-	-	3	3	-	7
GEOTHERMAL	-	-	-	-	-	-	-	-	-	-
OTHER	-	-	-	1	1	-	1	1	-	2
TOTAL	9	7	2	12	12	-	12	10	2	33

RENEWABLE ENERGY SCHEMES
(PLANNING AND LISTED BUILDING CONSENTS)
DETERMINED BETWEEN APRIL 2007 AND MARCH 2011
BY THE NATIONAL PARK AUTHORITIES IN WALES

SUMMARY

	2007 / 2008		2008 / 2009		2009 / 2010		2010 / 2011		TOTAL
	G.	R.	G.	R.	G.	R.	G.	R.	
WIND	5	2	2	4	5	2	5	2	27
SOLAR	24	3	15	1	22	1	13	1	80
PHOTOVOLTAIC	-	-	1	-	1	-	3	-	5
HYDRO	1	-	2	-	-	-	6	1	10
GEOTHERMAL	2	-	-	-	-	-	-	-	2
OTHER	-	-	-	-	-	1	2	-	3
TOTAL	32	5	20	5	28	4	29	4	127
85.8% Granted									

Annex 8 Governance, Delivery and Scrutiny in NPAs

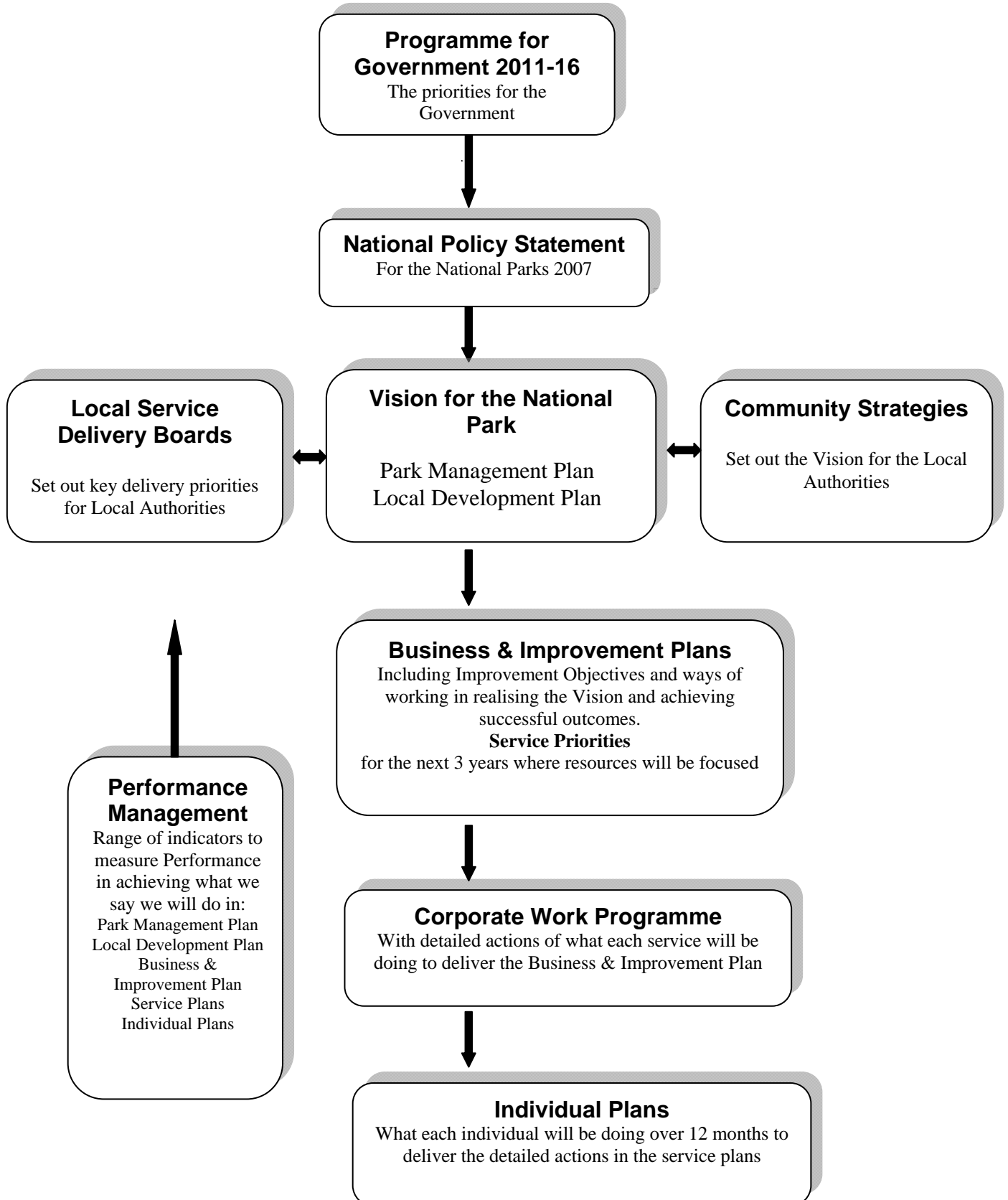|	
1.	**Are the principles of good governance being upheld, and are they driving improvement? If not, why not? What needs to change?** • Quarterly performance reports to appropriate Audit/Review and/or Performance committees with detailed reports for selected services including budget performance, development management and enforcement to monitor particular issues, quarterly trading reports, with officers held to account. Ffynnon data is used by officers and members to monitor performance • Open and transparent governance through pilot webcasting of all Authority and committee meetings in the Brecon Beacons. Survey currently out to assess views but have had nothing but positive anecdotal feedback. Viewing figures increasing each month. Chairmen operate standing orders effectively and explain governance issues where necessary for the viewing public. As a result of a member survey Pembrokeshire Coast NPA agreed to hold at least one committee meeting per year in the local community. Snowdonia NPA has trialled Authority meetings in the local community. Members of the public are allowed to ask questions at the start of Authority meetings in Snowdonia • All agendas, committee reports and minutes published on the website a week before meetings and a public speaking system operates effectively and is well used for planning (and for all committees in the Brecon Beacons NPA). In Snowdonia NPA all committee reports are bilingual and translation facilities are available at all public meetings • The NPAs respond positively to governance changes by developing protocols (e.g. Local Resolution Protocol and Procedure for Members Seeking Dispensation to Speak – 2013 – in response to advice from the Ombudsman). Brecon Beacons NPA is about to embark on a review of the effectiveness of the Authority and its committees, with help from its internal auditors, to ensure efficiency and the best use of member/officer resources. Scrutiny committees were introduced in 2012 following a joint project between Brecon Beacons NPA and Pembrokeshire Coast NPA to explore the options available to authorities that did not operate an executive system • Regular reviews of back office services are carried out with savings achieved on photocopying and postal contracts. A central printing solution has replaced desktop printers with copiers capable of scanning, facilitating records management and reducing paper usage. There are many examples of joint working between the 3 NPAs – e.g. on insurance procurement, member training, joint research consultancy contracts and between NPAs and local authorities – e.g. large scale printing, finance services, shared specialist officers, shared computer systems. Pembrokeshire Coast NPA has outsourced some car park operational management to local community organisations. Snowdonia NPA has transferred properties and land to local community enterprises

	- All three NPAs are Investors in People accredited organisations - The NPAs adopt good practice in governance by ensuring regulatory documents are regularly reviewed and updated to reflect any external or internal changes. Documents from other authorities are often referred to during the process. The Legal and Democratic Services network for UK National Parks shares good practice and provides advice, particularly to the two new English NPAs. The WLGA Member Support Officers' network promotes good governance and shares experience which encourages consistency across local government - NPAs are not required to carry out a scrutiny function (Local Government Measure) but Brecon Beacons NPA and Pembrokeshire Coast NPA have developed a scrutiny methodology as a result of a joint scrutiny project funded by the Welsh Government Scrutiny Fund. This has been disseminated to all UK National Parks. Snowdonia NPA used the results of the scrutiny to inform its future improvement objectives. Brecon Beacons NPA and Pembrokeshire Coast NPA now carry out two in depth scrutiny studies each year linked to their improvement objectives and a joint study by the three NPAs is being undertaken in 2013. Recommendations are approved by the Authority and the relevant Audit and/or Review Committees monitor the approved action plans to ensure that improvements to services are implemented. All three NPAs are about to commence a joint scrutiny of economic development in the National Parks. Pembrokeshire Coast NPA has contributed to the scrutiny committee at Pembrokeshire County Council on issues relating to tourism and the economy - User involvement – Public Speaking Scheme, consultation processes (community engagement, Local Development Plan, Local List, planning services user survey, Residents' Survey), public take part in Scrutiny Panels and bring invaluable objectivity. Used to improve services - Although the Wales Audit Office is trying to scale down the work required, auditing NPAs as small local authorities does not recognise the different purposes and services and is not always commensurate with the structure, scale and different risks involved. Brecon Beacons and Snowdonia NPAs have worked with internal and external audit to align audit work to avoid duplication of reporting, as these have a common purpose of improving governance
2.	**How effective is public engagement in influencing decisions and holding service-providers to account?** - Scrutiny processes are now bedding in and involving the public in recommendations on service delivery - Consultations as outlined above. Snowdonia NPA holds an annual meeting with the Farming Unions and also holds annual liaison group meetings in areas of local interest such as Tegid and Tryweryn, which have improved

	understanding and defused tensions
	• All three NPAs hold regular meetings with planning agents and with community councils
	• Scrutiny leads to operational improvements in many cases e.g. the joint study on the value for money provided by Rights of Way operations resulted in an action plan for further improvement
	• Strategic improvements through extensive consultation on National Park Management Plans and Local Development Plans
	• Snowdonia NPA uses co-opted members to give independent expert advice on the Plas Tan y Bwlch Advisory Group
	• Pembrokeshire Coast NPA has held Authority, Development Management, Standards and Review Committees in locations around the National Park in order to promote better understanding of the work of the Authority. Snowdonia NPA convenes annual meetings with the Community Councils; results are positive with a high percentage reporting greater understanding of the work of the Authority. Pembrokeshire Coast NPA also holds an annual meeting with all community councils within the National Park boundary
	• Trends in compliments and complaints are tracked regularly by Corporate Management Teams and Performance/Audit and Scrutiny Committees
	• Residents' surveys and Citizens Panels give NPAs useful information on how far citizens understand NPAs' role and governance. Webcasting and scrutiny processes have been the main methods of improving understanding in the Brecon Beacons NPA
	• Snowdonia NPA has achieved a Customer Service Excellence Standard from the Cabinet Office. This works on three levels: as a driver of continuous development; as a skills development tool; and as an independent valuation of achievement
	• The NPAs believe that they 'punch above their weight' for relatively small organisations through collaborative working with partners, but equally as relatively small organisations it is easier to respond to citizens
3.	**How effective are audit, inspection and regulation in driving change and supporting accountability and improvement?** • NPAs have a very effective relationship with external and internal auditors whereby strengths are identified and weaknesses acted upon • All three NPAs have consistently achieved high level assurance from their own Internal Auditors. Brecon Beacons NPA was awarded full assurance on

	governance by Deloitte in their role as internal auditors last year and substantial assurance on risk • Recommendations are reported to and monitored by the relevant Audit/ Performance and/or Review Committees with follow up reports • The Wales Audit Office has reported significant improvement in performance in the NPAs • NPA scrutiny is designed to be a clear, simple process linked to improvement objectives which can review performance and lead to service improvements • Pembrokeshire Coast NPA is currently finalising its scrutiny report into the effectiveness of its affordable housing policies
4.	**How well does formal and political scrutiny influence decision-making and improve accountability?** • NPAs respond well to local accountability in the form of the Local Authority appointed members who recognise the importance of bringing a local and a national perspective • NPAs report direct to the Minister for Culture and Sport – the Strategic Grant Letter sets priorities and provides a framework for performance measurement • Scrutiny is applied internally within NPAs – NPAs are also scrutinised formally by the Wales Audit Office, internal auditors and by political processes • Involvement of the public in NPA scrutiny studies is starting to have a positive effect through dissemination of good intentions – the joint scrutiny project on public rights of way took account of the evidence submitted by local and national partner organisations and an action plan for improvement was developed as a result

THE GOLDEN THREAD

NPA CORPORATE PLANNING and IMPROVEMENT FRAMEWORK

Programme for Government 2011-16
The priorities for the Government

↓

National Policy Statement
For the National Parks 2007

↓

Local Service Delivery Boards

Set out key delivery priorities for Local Authorities

←→

Vision for the National Park

Park Management Plan
Local Development Plan

←→

Community Strategies

Set out the Vision for the Local Authorities

↓

Business & Improvement Plans
Including Improvement Objectives and ways of working in realising the Vision and achieving successful outcomes.
Service Priorities
for the next 3 years where resources will be focused

↓

Performance Management
Range of indicators to measure Performance in achieving what we say we will do in:
Park Management Plan
Local Development Plan
Business & Improvement Plan
Service Plans
Individual Plans

Corporate Work Programme
With detailed actions of what each service will be doing to deliver the Business & Improvement Plan

↓

Individual Plans
What each individual will be doing over 12 months to deliver the detailed actions in the service plans

Study into Joint Working Opportunities for the Planning Departments of the three Welsh National Parks

Interim Report for Steering Group

Prepared by LUC
June 2013

Project Title: Study into Joint Working Opportunities for the Planning Departments of the three Welsh National Parks

Client: Snowdonia, Brecon Beacons and Pembrokeshire Coast National Park Authorities

Version	Date	Version Details	Prepared by	Checked by	Approved by Principal
1	7.6.13	Draft report for Steering Group comment	Taran Livingston, Lyndis Cole	Lyndis Cole	Lyndis Cole

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Study into Joint Working Opportunities for the Planning Departments of the three Welsh National Parks

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Contents

Tables

1   Introduction

1.1   LUC was commissioned in December 2012 by National Parks Wales and the three National Park Authorities (NPAs) to carry out a study into the opportunities for joint working and collaboration between the three Welsh NPAs that have reasonable prospects of delivering more effective and efficient planning services.

Background and context

Simpson Review and Compact between local government and Welsh Government

1.2   Since 2011, there has been a strong emphasis from Welsh Government on the need for joint working and collaboration between local authorities in Wales. The Local Government (Wales) Measure 2011 was passed by the National Assembly in March 2011, giving Welsh Ministers unprecedented powers to amalgamate two or three local authority areas and to issue statutory guidance on collaboration between councils. This was followed by the publication of the Simpson Review of local government[1], which made recommendations on how local government services could best be delivered in Wales in the forthcoming years, including calling for further collaboration between authorities in many service areas. It also proposed the establishment of a new Compact between local government and Welsh Government.

1.3   In December 2011, the Welsh Government and Local Government signed the "Compact for Change"[2], which was a joint commitment to reform, aimed at delivering improved and cost effective services to communities across Wales. The Compact is based on the development of voluntary collaborations between councils. The purpose of the Compact is to deliver resource savings and demonstrable improvements in service delivery for the people of Wales. The case for change must be evidenced against these criteria.

1.4   The Compact includes three specific Implementation Contracts between Welsh Government and local government. They address education, social services and the recommendations of the Simpson Review. The third Implementation Contract addresses services other than education and social services, and states that among other measures, **Welsh Government and Local Government agree to take forward collaboration in the delivery of planning services, including specialist services and the planning application process**, informed by the Independent Advisory Panel established by the Minister for Environment and Sustainable Development.

Planning Bill

1.5   In 2011, Welsh Government announced that it would be bringing forward a Planning Bill which would allow the government to introduce primary legislation to reform the Welsh Planning system. In September 2012, the Welsh Government confirmed that the White Paper and draft Planning Reform Bill will be published during 2013.

1.6   As part of preparing the White Paper, an Independent Advisory Group (IAG) chaired by the former Director of the Planning Inspectorate in Wales was set up to do a planning review and advise how to deliver the planning system of the future. The IAG undertook a Call for Evidence, asking for the public's thoughts about how planning works currently and how it could be better.

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[1] Local, Regional, National: What services are best delivered where? A Report to Carl Sargeant AM, Minister for Social Justice and Local Government. (The Minister appointed Joe Simpson of Local Government Leadership to lead this review. Two groups were established to take this review forward, a Review Group and a Reference Group.)

[2] A Compact for Change between the Welsh Government and Welsh local government.
http://wales.gov.uk/topics/improvingservices/publicationsevents/publications/compact/:jsessionid=685F9E1DF8C529F565924F2A96421E7C?lang=en.

Independent Advisory Group report

1.7   The IAG Report[3], which was published in September 2012:

- Identified the key policy objectives that the planning system is required to deliver now and in the future;

- Assessed existing institutional delivery arrangements, noting areas of good practice and areas in need of improvement; and

- Proposed 97 recommendations to improve the future delivery of the planning system in Wales.

1.8   With respect to NPAs, the IAG Report does not make any specific recommendations. However, of relevance to this study, the IAG Report includes a recommendation (no. 54) that Welsh Government consults on the scope for planning applications on certain matters (e.g. minerals and waste, gypsy and traveller sites) to be processed and assessed by specialist planning teams operating on a regional basis. Drawing on their interpretation of the Simpson Review, the IAG considers that authorities need to work together to make the best use of resources available to them and to ensure LPAs have access to the specialist expertise they require (in particular for determining planning applications). The IAG considers that this could be achieved through the creation of teams working on a regional basis, this would result in a network of specialist resources that can be called upon where an individual LPA does not possess the necessary in-house knowledge. In the current economic climate, the IAG considers it is essential that authorities are able to share resources rather than having to buy in external advice.

Review of planning service delivery in Welsh NPAs and AONBs

1.9   During 2011-2012, LUC was commissioned by the Welsh Government to carry out a review of planning service delivery in the Welsh National Parks and Areas of Outstanding National Beauty (AONBs). Similar to the IAG Report for the Planning Bill, one of our recommendations was that:

The right specialists should be available to provide advice on individual planning applications, including at the pre-application stage.

1.10   We noted that for large applications this would be best achieved through a 'Development Team' approach or similar supported by clear protocols. This was illustrated by Powys and Anglesey County Councils. Under this approach a Development Team comes together to provide pre-application advice to the applicant with the team including the case officer (Development Management); Forward Planning; landscape; conservation; highways; and economic development officers; and education and affordable housing enabler where relevant.

Project Brief

1.11   Within this legislative context and clear steer from Welsh Government regarding joint working and collaboration, the specific project brief for this study was:

"To determine whether there are realistic, economical and workable opportunities for collaboration and joint working in planning between the three NPAs.

*In this context "**Planning" includes the whole planning service delivered by NPAs, and the associated technical and specialist planning supports provided internally and externally by consultants. This includes but is not wholly restricted to:*** [emphasis added]

- *Development management, including enforcement.*

- *Plans, policy and guidance.*

- *Listed buildings and Conservation Areas.*

- *Archaeology.*

- *Landscape, trees and hedges.*

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[3] Towards a Welsh Planning Act: Ensuring the Planning System Delivers. Report to the Welsh Government by the Independent Advisory Group, June 2012.

- *Minerals control.*

- *Community participation and engagement."*

Project Objective

1.12 The project objective was:

*"To determine whether there are **realistic, economical and workable** opportunities, to share and deliver planning resources and services between two or more of the Welsh NPAs."* [Emphasis added].

1.13 It was noted by the Steering Group (Snowdonia NPA Chief Executive plus the Heads of Planning from the three NPAs) at the inception meeting for this study that in terms of the 'economical' criterion, we should consider delivery of planning services that are either equivalent to current service delivery but delivered at a lower cost, or a significantly better service delivery at the same cost. However, for any opportunities identified as realistic and workable, the Steering Group also agreed to help LUC to determine if they are also economical, recognising that methods of accounting differ across the three NPAs.

Project Outputs

1.14 The three NPAs required the following outputs:

- Progress report.

- Draft interim report.

- Fully bilingual final report with executive summary.

Purpose of this Report

1.15 This report constitutes the second output, the draft interim report, which summarises the work undertaken to explore opportunities for joint working, describes and evaluates the opportunities identified, and makes initial recommendations for the three NPAs to consider. This draft interim report will be circulated to the study Steering Group for comment and discussion at the next progress meeting on 1st July 2013.

1.16 Any comments received will be addressed and incorporated into a final version of the report, which will set out the final recommendations of the study, and will include an executive summary. The final report will also be translated into Welsh.

1.17 The Steering Group advised that the audience for this study is primarily the Steering Group, but the Welsh Government Minister will also be sent the executive summary. In addition, depending on the findings and recommendations, the NPA officers in the three Planning Departments will also be the audience.

Structure of this Report

1.18 After this introduction, the remainder of the report is structured as follows:

- **Chapter 2 Approach –** sets out the approach taken to the study, including interviews with Welsh NPA officers in the planning teams, and contact with English NPA Heads of Planning, and summarises the opportunities identified for joint working.

- **Chapter 3 Evaluation of opportunities for joint working** – describes the criteria used and the findings of the assessment of whether the opportunities identified are realistic, economic and workable.

- **Chapter 4 Recommendations –** sets out our initial recommendations for joint working opportunities for the three Welsh NPAs to consider, along with potential timescales needed and suggested approaches for implementing the recommended opportunities. There are some proposals which can largely operate in isolation of other recommendations but there are one

or two which form the lynch pin to other recommendations and therefore, even if not of themselves cost effective, are essential for achieving overall better and more integrated joint working. A critical element considered in the recommendations is that the proposals add up to make a more integrated whole, where more can be achieved for the same or less money but which also create a more consistent view for an external audience of how planning is undertaken within the NPAs.

2 Approach to study

2.1 This study was undertaken with a lot of valuable input from officers within the three Welsh NPAs, and LUC is very grateful for the time given by the Steering Group (the three Directors of Planning and Snowdonia's Chief Executive) and those officers who participated in the interviews during January-February 2013, and the workshop in April 2013.

Interviews with Directors of Planning and relevant planning service leads in each NPA

2.2 LUC carried out interviews with each of the Heads of Planning in the three Welsh NPAs, and lead officers for a range of planning services in order to obtain views on examples of joint working or collaboration that have worked well (or not) in the past, and ideas for opportunities for new and/or improved joint working initiatives. **Table 2.1** shows which officers were interviewed in each NPA. Note that two of the telephone interviews with PCNPA involved more than one officer.

Table 2.1: Names and roles of NPA officers interviewed

Name	Role
Pembrokeshire Coast NPA	
Jane Gibson	Director of Park Direction and Planning
Rob Scourfield	Building Conservation Officer
Martina Dunne	Head of Park Direction
Alan Hare	Business and Performance Manager
Michel Regelous	Conservation Policy officer
Phil Roach	Head of Discovery
Vicki Hirst	Head of Development Management
Liam Jones	Principal Planner
Brecon Beacons NPA	
Christopher Morgan	Director of Planning
Tracy Nettleton	Head of Policy, Strategy & Heritage
Jane Pashley	Planning Administration Supervisor
Kevin Jones	Head of Development Control
Paul Sinnadurai	Conservation Manager
Snowdonia NPA	
Aled Sturkey	Director of Planning and Cultural Heritage
Gwilym Jones	Head of Cultural Heritage
Iwan Evans	Head of Strategic Policy and Plans
Aled Lloyd	Head of Development Control and Enforcement
Chris Smith	Head of Natural Environment and Forestry

2.3 All interviewees were sent the following questions and each interview followed the format of these questions:

1 Can you identify any past or existing examples of cross National Park working; have these been beneficial; if so why and how?

2 Are there examples of cross National Park working that have not been successful and, if so, why?

3 Are there existing examples of joint working between NPAs and LPAs? Could those existing relationships affect the opportunities for joint working between the NPAs? (For example

because they are already successfully achieving delivery of a planning service, e.g. minerals planning, and may not need to change.)

4   What are the potential advantages or disadvantages that you see resulting from increased joint working/collaboration between the NPAs?

5   Can you think of any areas of planning work that would benefit from the adoption of common approaches between NPAs to allow consistent reporting between NPAs? e.g.:

- Planning Service questionnaires

- Customer satisfaction questionnaires

6   Are there any areas of reporting where you have been frustrated that you cannot compare your data with that of other Welsh NPAs?

7   Can you identify areas of obvious duplication of effort between different NPAs?

8   Are there areas of joint working that you have been impressed with in other organisations?

9   Are there areas of work that could usefully be shared between NPAs? E.g.:

- Technical support

- Specialist advice

10   What are the roles/tasks that you feel must continue to be embedded/tailored to the needs of the individual NPAs?

Interview findings

2.4   A number of similar responses were given in relation to the questions posed during the interviews, and in particular suggestions for areas of planning work that would benefit from the adoption of common approaches between the NPAs. However, not all views were the same, and the key findings from the interviews are summarised below.

2.5   There were mixed opinions with regards to **successful previous examples of NPA joint working**, with some indicating that this is done well when necessary, while one interview felt it was not done enough. The most commonly cited example of successful NPA joint working was the Joint Design Guide for Sustainable Development Supplementary Planning Guidance (SPG), followed by joint responses to Welsh Government consultations. Joint working on specific projects, joint commissioning of consultants, providing training plus informal support and advice to each other were also cited as successful joint working examples.

2.6   A number of the interviewees did not identify any **unsuccessful examples of NPA joint working**, but those that were cited included the PriceWaterhouseCoopers review of whether the planning services of all three NPAs in Wales provide value for money (due to the different methods between the three NPAs for collecting and analysing their data, so it was very hard to get directly comparable statistics), as well as procurement of similar computer systems (due to requirements of each NPA proving too different) and sharing landscape specialist advice (considered unlikely to work due to the distances the specialist would have to cover between the three National Parks).

2.7   A number of the points raised regarding **advantages and disadvantages of joint working** were considered by different interviewees to be both advantages and disadvantages. For example, while several highlighted the potential increased efficiency and cost saving, another interviewee felt that increased joint working could actually reduce efficiency (e.g. considering geographical distances involved and the potential for administrative processes to take longer).

2.8   Generally, responses to the question about obvious duplication of effort corresponded to the responses to the question relating to areas of planning work that would benefit from the **adoption of common approaches** or **work that could be shared between NPAs**.

2.9   A number of interviewees felt it would be useful if the three NPAs were able to **report consistently** on planning statistics and had consistent performance indicators. All the interviewees agreed that it would be useful if the NPAs used the **same customer satisfaction and planning services questionnaires** and took a common approach to issuing them and analysing them. A number of other examples of planning work that would benefit from adopting

common approaches were identified, including regular meetings between equivalent NPA officers, planning advice notes/guidance/leaflets and LDP monitoring (the full list is included in **Table 2.2).**

2.10   While there were many examples cited by interviewees of **planning work that could usefully be shared between NPAs** (e.g. specialist advice, sharing officer roles, administration of planning applications etc. – see **Table 2.2**) many commented that there would be problems with the practicalities due to the physical separation of the NPAs, and also that if there was just one particular officer shared between all three NPAs, it would not be enough resource for each individual NPA.

2.11   A number of examples of **successful joint working in other organisations** were provided, however it was the principles about the way in which this needs to take place that were most useful to this study i.e. what makes successful joint working. It was noted that to achieve successful joint working between organisations, there needs to be one lead partner that will push to get things done and in time, and everybody has to take their turn to lead.

2.12   In general, the strong consensus of the interviewees was that any task which enables the NPAs to conserve and enhance the National Parks and their local distinctiveness and unique identity needs to be **maintained through local staff**. Examples included development management tasks and, in particular, the determination of applications, as well as enforcement, heritage/archaeology and ecology. A few interviewees considered that LDP and SPG preparation should be retained locally.

2.13   All three of the NPAs were able to provide a range of examples of ways in which they **work with constituent and nearby LPAs**, most of which focussed on sharing resources (including staff) and information, many of which are implemented formally through Service Level Agreements or joint funding.

2.14   The opportunities for joint working and collaboration that were suggested during the interviews are set out in **Table 2.2** (those shown in *italics* were added by LUC). Table 2.2 sets out potential joint working opportunities for the three Welsh NPAs, in relation to each of the key planning services referred to in the brief (see para. 1.1 of this report).

2.15   For each service, the potential joint working opportunities identified for the different planning services have been categorised in relation to a number of overarching themes or 'approaches' to joint working, as follows:

1   Alignment of systems (e.g. IT).

2   Standardised procedures (e.g. on pre application advice).

3   Standardised approaches to recording information.

4   Joint approach to preparation of advice notes/ policy/ position statements.

5   Sharing of specialist knowledge.

6   Shared officers / roles.

7   Secondment of staff.

8   Buying into other NPA's services through Service Level Agreements (SLAs).

9   Joint framework agreements e.g. with specialist consultants or for legal advice.

2.16   The opportunities in Table 2.2 were discussed during the workshop, where some were discounted and a few more were identified. The full set of opportunities identified has been evaluated in **Chapter 3**, in terms of whether they are realistic, effective and efficient, economic and workable.

Table 2.2: Potential opportunities for joint working between the three NPAs planning services

Potential joint working approaches	Development management and enforcement	Plans, policy and guidance	Listed buildings and conservation areas	Archaeology	Landscape, trees and hedges	Minerals control	Community participation and engagement
1. Alignment of systems (e.g. IT)	**Yes:** Centralised administration of planning applications, e.g. registering and logging documents. Planning database could be shared.	**Yes:** GIS expertise and/or a consistent system could be shared between all three NPAs.	**Yes:** GIS expertise and/or a consistent system could be shared between all three NPAs.	**Yes:** GIS expertise and/or a consistent system could be shared between all three NPAs.	**Yes:** GIS expertise and/or a consistent system could be shared between all three NPAs.	**Yes:** GIS expertise and/or a consistent system could be shared between all three NPAs.	**Yes:** Common or joint approach to consultation databases or mailouts.
2. Standardised procedures (e.g. on pre application advice)	**Yes:** Consistent planning validation approach. Common approaches to committee meetings. Planning Appeal statements – NPAs could develop a template for generic issues, plus share information on appeals. Standard schemes of delegation. Joint training of staff and Members. *Common approaches to pre-application advice.*	**Yes:** Collaboration on minerals and waste policy. Joint training of staff and Members.	**Yes:** Common approach to websites and awareness raising. Joint training of staff and Members. *Common approaches to pre-application advice.*	**Yes:** *Common approaches to pre-application advice.* Joint training of staff and Members.	**Yes:** *Common approaches to pre-application advice.* Joint training of staff and Members.	**Yes:** *Common approaches to pre-application advice.* Joint training of staff and Members.	**Yes:** Common approach to websites and awareness raising. Common or joint approach to consultation databases or mailouts. Establishing and running Planning Forum in each NPA to help to monitor planning service delivery with local stakeholders. Joint training of staff and Members.
3. Standardised approaches to recording information	**Yes:** Standard planning service questionnaire. Standard set of key performance indicators.	**Yes:** Increased liaison in relation to LDP monitoring. Standard set of					**Yes:** Common approach to customer satisfaction questionnaires.

Potential joint working approaches	Development management and enforcement	Plans, policy and guidance	Listed buildings and conservation areas	Archaeology	Landscape, trees and hedges	Minerals control	Community participation and engagement
		key performance indicators.					
4. Joint approach to preparation of advice notes/ policy/ position statements	**Yes:** Produce planning advice notes/leaflets/basic guidance notes in collaboration. Joint responses to WG consultations. *Preparation of joint SPGs.*	**Yes:** Joint working on policy making. Production of joint position statements. Preparation of joint SPGs. Joint responses to WG consultations.	**Yes:** *Preparation of joint SPGs.* Joint responses to WG consultations.	**Yes:** *Preparation of joint SPGs.* Joint responses to WG consultations.	**Yes:** standard advice on protected species and for ecological surveys. Joint responses to WG consultations. *Preparation of joint SPGs.*	**Yes:** *Preparation of joint SPGs.* Joint responses to WG consultations.	**Yes:** Produce planning advice notes/leaflets/ basic guidance notes in collaboration. Joint responses to WG consultations.
5. Sharing of specialist knowledge	**Yes:** Regular meetings between equivalent NPA officers.	**Yes:** Sharing research and technical expertise for informing LDP work. Regular meetings between equivalent NPA officers.	**Yes:** Provision of building conservation advice by the CADW delegated LPAs. Regular meetings between equivalent NPA officers.	**Yes:** Regular meetings between equivalent NPA officers.	**Yes:** One of the NPAs could be part of a working group to look at guidelines for Tree Protection Orders and represent the other three. Regular meetings between equivalent NPA officers.	**Yes:** Regular meetings between equivalent NPA officers.	**Yes:** Regular meetings between equivalent NPA officers.
6. Shared officers / roles			**Yes:** Sharing/ joint funding of building conservation officers.	**Yes:** Joint funding of archaeological/ heritage officer posts between local archaeological trusts and NPAs. Sharing/joint	**Yes:** Sharing/joint funding of landscape advisor. Sharing/joint funding of the ecology team and an agricultural		**Yes:** Sharing resources for community engagement opportunities e.g. facilitation of meetings. Centralisation of

Potential joint working approaches	Development management and enforcement	Plans, policy and guidance	Listed buildings and conservation areas	Archaeology	Landscape, trees and hedges	Minerals control	Community participation and engagement
				funding of an archaeologist.	advisor.		press and PR.
7. Secondment of staff	**Yes:** Secondment of DM officers between NPAs.	**Yes:** *Secondment of planning policy officers between NPAs.*	**Yes:** *Secondment of heritage and conservation officers between NPAs.*	**Yes:** *Secondment of archaeology officers between NPAs.*	**Yes:** *Secondment of landscape/trees officers between NPAs.*	**Yes:** *Secondment of minerals planning officers between NPAs.*	**Yes:** *Secondment of officers with experience of community participation and engagement between NPAs.*
8. Buying into other NPA's services through SLA	**Yes:** SLAs for processing planning applications.			**Yes:** Potential for SLA between Archaeology Cymru and NPAs.		**Yes:** Potential for SLA between authorities to process planning applications.	
9.Joint framework agreements e.g. with specialist consultants or for legal advice	**Yes:** Joint approach to procurement of specialist advice that is not often required, e.g. low impact development applications. Jointly procuring legal advice on planning applications. Shared approach to S.106 administration – drawing up the agreement with solicitors.				**Yes:** *Joint approach to procurement of landscape advice.*		**Yes:** *Joint approach to procurement of community participation and engagement advice/facilitation.*

Workshop with Directors of Planning and relevant planning service leads

2.17   A workshop was held on 15th April 2013 in Aberystwyth with the Steering Group plus a number of the NPA officers that had contributed to the interviews. **Table 2.3** sets out the workshop attendees.

2.18   As opposed to the interviews which were done on an individual basis, the workshop provided an opportunity for the NPA officers to debate the opportunities for and constraints to joint working collectively, and to feed in ideas on how the joint working might be achieved in practice.

Table 2.3: Names and roles of NPA officers who attended the workshop

Name	Role
Pembrokeshire Coast NPA	
Jane Gibson	Director of Park Direction and Planning
Alan Hare	Business and Performance Manager
Brecon Beacons NPA	
Christopher Morgan	Director of Planning
Tracy Nettleton	Head of Policy, Strategy & Heritage
Jane Pashley	Planning Administration Supervisor
Kevin Jones	Head of Development Control
Paul Sinnadurai	Conservation Manager
Snowdonia NPA	
Aneurin Phillips	Chief Executive
Aled Sturkey	Director of Planning and Cultural Heritage
Iwan Evans	Head of Strategic Policy and Plans
Aled Lloyd	Head of Development Control and Enforcement

Contact with English NPA Directors of Planning

2.19   To provide additional context LUC also explored if there were examples of successful joint working between the English NPAs. To do this, LUC emailed all the English NPA Directors of Planning asking them the following questions:

1   Do you have any examples of joint working or collaboration between your NPA and any of the other English NPAs? (This can be anything from seconded staff, sharing specialist knowledge, joint commissioning of research, standardised approaches to recording information or activities such as pre-application advice etc.)

2   If yes, were they successful?

3   If yes, how did they work in practice? (e.g. was communication via phone/email or involving lots of meetings? Did one NPA take the lead role? Etc.)

4   If no, do you know of any collaborations/joint working between the other English NPAs that your NPA wasn't involved in?

2.20   Replies were received from some of the NPAs and LUC sought to call those NPAs where there is potential for joint working because of (a) close geographic proximity and/or (b) a reason to cause them to work together (e.g. the potential 'Lakes to Dales' designation linking the Lake District and Yorkshire Dales NPAs). In this case, despite the potential geographic linkage, the respective NPAs have not been working together on this, instead each working more closely with Natural England. The common message was that the English NPAs do not have numerous examples of formally working jointly. While they do a fair amount of informal collaboration and information sharing (much as the Welsh NPAs do), it seems that the Welsh NPAs may actually have more examples of working jointly (e.g. on SPGs and commissioning joint studies). Therefore, given the Welsh Government's emphasis on more collaboration between LPAs, the Welsh NPAs have an opportunity to lead the way among NPAs/LPAs and become exemplars of joint working.

2.21 The main **formalised joint working arrangements** cited amongst the English NPAs were:

- **Heads of Planning Group** from all English NPAs, which meets four times per year via video-conferencing alternating with a meeting in Birmingham. This is a formal arrangement, and involves the ENPAA Director. The agenda includes a standing item (responses to Government planning consultations), plus tending to cover a roundup of what is happening in each NP (e.g. benchmarking/statistics, team numbers, which was helpful during restructuring processes to share experiences). These meetings are a good focus for sharing information, collaborating, channelling their responses to Government. There are also working groups for the Chief Executives, National Park managers and policy officers.

- Information gets cascaded down from the Heads of Planning Group meetings, including **initiatives** that are followed up. For example, last year, Lake District NPA hosted **a conference on climate change**. While Lake District NPA organised the local logistics, study tours etc., another NPA organised all the speakers, so organisation was shared. In the past, the NPAs organised other **joint conferences**, e.g. on enforcement and development management. It was noted that these are always time well spent (even if the time is hard to find).

- Some examples were identified of **shared commissioning of research** between <u>all</u> the English NPAs, which is co-ordinated through the Heads of Planning Group and ENPAA – e.g. "Planning in England's National Parks" currently being prepared by the Centre for Rural Economy at Newcastle University.

- Most **responses to relevant Government consultations** on planning are jointly prepared and co-ordinated on behalf of several or all NPAs through ENPAA.

- The Society of National Park Staff organises **study tours and secondments** between NPAs. This is UK-wide, and has been running for decades. It includes an annual conference (in Peak District this year), which is organised by the staff of National Parks, and each NPA has representatives (funding from individual NPAs) with a mix of social and professional activities.

- **Minerals Planning Advice** where the North York Moors NPA has an agreement (with a small annual cost) with the Yorkshire Dales NPA that enables them to access minerals planning advice from a named minerals planner. However, in practice this does not happen often.

2.22 Like the Welsh NPAs, there are examples of **more ad hoc, informal assistance/advice** given between the NPAs, for example:

- Sharing advice/knowledge on an ad hoc basis tends to be **more with closest neighbours** and is based on relationships that build up over time between different NPA officers (e.g. Dartmoor/Exmoor, North Yorkshire/Yorkshire Dales, Lake District/Peak District), as well as facilitating visits to discuss practical issues..

- For example, Lake District NPA has tended to build relationships mostly with the Peak District as they are their closest neighbour, but also because the scale, nature and volume of their planning casework is more likely to be similar. The Lake District and Peak District NPAs have previously had **regular video conference meetings** every few months with a set agenda to discuss development management issues, which worked very well. Recently the Lake District NPA shared their approach on planning performance agreements with the Peak District NPA.

- Similarly, Dartmoor NPA noted that they recently **shared one of their ecologists** with Exmoor NPA, but this is difficult when workloads are high for both NPAs. They also work jointly with Exmoor on developing best practice, a recent example related to customer service and developing a customer charter.

- They also have a yearly **design review tour** attended by Dartmoor, Exmoor and the New Forest NPAs which includes officers and Members and is a good opportunity to share design issues and best practice, as well as to consider practical issues on the ground relating to design and policy. Normally this would rotate between the three Parks, but for the past few years it has been organised by the New Forest NPA.

- Advice shared in relation to **reviews and re-structuring of departments** (information was also shared through the regular Heads of Planning meetings).

- Acting as a **'critical friend'** in relation to large pieces of planning work e.g. Core Strategies and Management Plans. For example, when the Peak District needed some help on their Core Strategy, the Chief Executive got in touch with other NP Chief Executives to see if other NPA officers could provide a critical friend service to help them out. North Yorkshire Moors NPA did the same for the Lakes District's Management Plan.

Unitary Authority model

2.23   LUC also considered the potential similarities between the three Welsh NPAs working jointly and the example of creating a Unitary Authority. The example that was followed up was that of the seven local authorities in Cornwall which have become a single unitary authority – Cornwall Council, and therefore are now required to work jointly. Cornwall was selected as potentially the most realistic example in that it is a remote County and being long and thin with poor communication routes, shares similarities with Wales. It is also a very rural County, suffers from significant deprivation, and has significant areas of protected landscape, in this case the Cornwall AONB and long lengths of Heritage Coast.

2.24   To find out about the changes that have come with becoming a Unitary Authority we spoke to a development management officer who previously worked for North Cornwall District.

2.25   It was a significant and long term project, which involved a full management review and organisational restructuring, including identifying what and who was working well and, based on this, creation of new centralised teams, managers and roles. In addition, a new IT system was installed so that all staff are able to access the same files and information, irrespective of where they are located within Cornwall. There was also significant streamlining of processes, for example, the Council is now paperless, such that all maps, letters, planning applications etc. are scanned and available electronically.

2.26   There are still a number of offices around Cornwall (generally in the old local authority properties), and hot-desking plus the integrated IT system enables officers to work at any of these offices as necessary.

2.27   Clearly, this was a difficult process for all staff to go through, but after the settling in period, the officer we spoke to recognised that operations and service delivery are definitely improved. A key message was that good communication between officers was crucial because officers work within centralised teams, but from their local area offices. Therefore, to this end, officers attend many regular meetings, which generally alternate between the different offices, or are held at a mid-point location.

3 Evaluation of opportunities for joint working

3.1 **Table 3.1** lists all of the opportunities identified through discussions with NPA officers in the interviews and workshop and LUC's own suggestions, grouped by the nine overarching approaches to joint working (identified in para. 2.15). 43 opportunities were identified and evaluated. Based on the evaluation and, in particular, points raised at the workshop in April, eight of the opportunities have been discounted as they are unlikely to deliver any benefits in terms of being effective, efficient or economical, or they are not opportunities for joint working exclusively between the NPAs (i.e. they could involve other Welsh LPAs). These eight opportunities are shaded grey in **Table 3.1**, and listed in **Chapter 4**.

3.2 The approach to the evaluation is described below, and the recommendations arising from our evaluation are discussed in **Chapter 4**.

Criteria for evaluation

3.3 As required in the brief, the criteria used for evaluating the potential opportunities for joint working needed to consider whether each proposal was realistic, economic and workable. LUC considered it useful to add in the criteria of whether the opportunity would also be effective and efficient, and used the following approach to the evaluation, by defining what is meant by each of these terms:

- **Realistic** – is the opportunity possible given current systems, cultures and structures within the NPAs? (Judgement = Yes, No, Potentially in the longer term).

- **Effective and Efficient**

  - Effective: will the opportunity help to deliver existing objectives and targets for planning services? (Judgement = Yes, No).
  - Efficient: will the opportunity make processes run more smoothly? (Judgement = Yes, No).

- **Economic** –

  - Will the cost of delivering planning services be maintained at current levels (and provide improvements)? And/or:
  - Will the cost of delivering planning services be less than current levels (and maintain or improve service)? Or:
  - No perceived benefit in cost or quality.

- **Workable** – what is needed to make the opportunity workable? (E.g. what is the level of change required to current systems, operational processes, cultures and structures to make it workable?) (Judgement = major change, moderate change, minor change)

3.4 The evaluation is based on the 'face value' of each opportunity, i.e. because the study did not include a detailed review of current service delivery in relation to each opportunity identified, we have not done a detailed comparison with the current situation, but have drawn on views expressed by NPA officers during interviews and the workshops, as well as our own professional judgement.

3.5 As noted in Chapter 1, the Steering Group proposed to help with determining whether any of the realistic and workable opportunities would also be economic.

Table 3.1: Evaluation of opportunities for joint working

Key to Planning Services listed in table (as per those listed in the study brief):

- Development Management & Enforcement (DM&E)
- Plans, Policy and guidance (Policy)
- Listed Buildings & Conservation Areas (LB&CA)
- Archaeology (Arch)
- Landscape, trees & hedges (L/scape)
- Minerals control (Mins)
- Community participation & engagement (Comm)

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
1. Alignment of systems (e.g. IT)					
1.1 Centralised administration of planning applications	DM	Potentially, in the longer term.	Yes it would be effective and efficient.	It would be likely to deliver the same level of service for lower cost of delivery than current levels.	**Major change** – would require all three NPAs to purchase and implement the same integrated IT system, and then co-ordinate use of the system to ensure all administration of planning applications done in the same way. Or, for one NPA to take on the administration for all three.
1.2 Integrated IT system for all planning services	All	Potentially, in the longer term.	Yes it would be effective and efficient.	It would be likely to deliver the same level of service for lower cost of delivery than current levels in the longer term, despite the need for potentially considerable investment initially to get IT system for all three NPAs onto same network and able to be shared. However, given the importance of having an integrated IT system for all planning services (i.e. it is a	**Major change** – would require all three NPAs to purchase and implement the same integrated IT system, as well as investment in securing use of the same network (although this may be facilitated by the Public Sector Broadband Aggregation Network that all LPAs are currently migrating to). PCNPA and SNPA already have the same IT system for their planning services, however, it is not currently shared.

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
				lynchpin of moving towards more joint working), the investment is likely to pay off with cost-savings made in the future.	
1.3 Integrated Geographic Information System and joint licences for GIS software	All except Comm	Potentially, in the longer term.	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels.	**Major change** – would require all three NPAs to purchase and implement the same integrated IT system, and share joint licences for GIS software.
1.4 Create a joint 'tendering'/research database to log projects that each NPA has undertaken or commissioned, to enable sharing of information	Policy mostly	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not repeating work done by one of the other NPAs.	**Minor change** – would just need one NPA to take the lead and create the database, but with regular input from one or more officers in the other two NPAs to keep up to date.
1.5 Use of Planning Aid Wales (for Community Engagement exercises)	Comm	Yes.	Yes it would be effective and efficient (although not necessarily more efficient than each NPA organising their own community engagement).	It could potentially deliver an improved service for the same cost as current levels.	**Moderate change** – would require discussions with Planning Aid Wales, NPAs developing a brief and then commissioning of the service (jointly by the NPAs). Could second NPA officers to Planning Aid Wales to learn and do the community engagement, then bring that knowledge and experience back to the NPA.
2. Standardised procedures					
2.1 Validation of planning applications	DM	Yes.	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels.	**Moderate change** – would need a working group to agree the standardised procedure for validating planning applications (with sign-off from Directors of Planning), and then for

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
					each NPA's administration team to be trained in the new procedure.
2.2 Common approaches to Committee Meetings	DM&E and Policy mostly	Yes.	Not necessarily more effective and efficient, as Committee structures, meeting rooms and equipment are not all the same in each NPA.	Not likely to improve service or costs.	**Moderate change** – would need a working group to agree the standardised procedure for Committee Meetings (with sign-off from Directors of Planning), and then for each NPA's Members and officers to be trained in the new procedure.
2.3 Planning Appeal statements – standardised approach for generic issues, plus share information on specific types of appeals.	DM&E mostly	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not repeating work done by one of the other NPAs.	**Minor change** – would just need one NPA to take the lead and send around a draft template of standard text for dealing with common/generic issues arising from appeals. Relevant officers in each NPA could then add to/amend with their own examples and then seek sign-off from Directors of Planning (or Heads of DM&E). Sharing of information on specific types of appeals should also be relatively simple to implement, if one NPA officer takes the lead to send regular reminders to relevant NPA officers to send round examples of approaches taken to recent appeals.
2.4 Standard schemes of delegation.	DM&E	Yes.	Not necessarily more effective and efficient, as each NPA has to meet same target of 80% delegation.	Not likely to improve service or costs.	**Moderate change** – would need a working group to agree the standard schemes of delegation (with sign-off from Directors of Planning), and then for each NPA's Members and officers to

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
					be trained in the new schemes.
2.5 Common approaches to pre-application advice.	DM&E	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost.	**Moderate change** – would need a working group to agree the common approach to pre-application advice (with sign-off from Directors of Planning), and then for each NPA's officers to be trained in the new approach. However, NPA officers advised that Welsh Government intends to establish a pre-application protocol, which it is considered worth waiting for rather than developing a common approach just for the NPAs that may be superseded by the Welsh Government protocol. **Major change** – alignment of IT systems (see opportunity 1.2) would help to facilitate a common approach to pre-application advice.
2.6 Joint training of staff and Members.	All	Yes.	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels.	**Moderate change** – while joint training of Members has occurred in the past, it is not currently occurring between the three NPAs. There are existing presentations prepared by Welsh Local Government Association (WLGA) that could be used and adapted to suit NPA purposes, and training could be delivered by suitable NPA officers (interested and experienced at training). SNPA provides initial training for new NP officers (UK wide), but follow up/improver training sessions could be

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
					implemented, potentially as part of the regular meetings between relevant NPA officers (see opportunity 5.1). It would require agreement about a regular training programme, what topics to be covered, who provides training, where and when etc.
2.7 Collaboration on minerals and waste policy.	Policy	Yes.	Not necessarily more effective and efficient, as each NPA is already part of a joint working arrangement (e.g. North Wales Minerals & Waste Group, plus Service Level Agreements with Carmarthenshire County Council).	Not likely to improve service or costs, as existing joint working arrangements in place with neighbouring/constituent LPAs, and minerals applications/issues do not come up frequently enough to warrant trying to provide the service within and jointly between the NPAs.	**Major change** – would require termination of current service level agreements and establishment of new joint working arrangements between the three NPAs, including recruitment of minerals expertise into the NPAs.
2.8 Common approach to websites and awareness raising.	All	Yes.	Yes it would be effective and efficient.	It would be likely to deliver the same level of service for lower cost of delivery than current levels.	**Moderate change** – would require one 'webmaster' for all three NPAs, potentially for each of the service areas to ensure that material is consistent, up to date etc.
2.9 Common or joint approach to consultation databases or mailouts.	Comm	Yes.	Not necessarily more effective and efficient, as there are not too many consultees in common (except for the statutory consultees and national	Not likely to improve service or costs, as existing databases and mailout processes in place, and the vast majority of consultees are local to each NPA.	**Moderate change** – would require amalgamation of databases, and possibly one NPA to take the lead on administering the database and dealing with mailouts.

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
			organisations). Each NPA already has their own database of local consultees, and each NPA's consultations running to different timetables.		
2.10 Establishing and running Planning Forum in each NPA to help to monitor planning service delivery with local stakeholders.	Comm, but also DM&E	Yes.	Yes it would be effective and efficient (having a standard procedure would save time for all three NPAs).	It would be likely to deliver an improved service for the same cost as current levels. Stakeholder perception may be improved if three NPAs show they are working together on Planning Forums and taking a consistent approach.	**Moderate change** – would need a working group to develop and agree the standard procedure for running Planning Forums (with sign-off from Directors of Planning), then for relevant officers in each NPA to be trained in the new approach, and to take responsibility for running the Forums at regular intervals (e.g. 6 monthly). May require or be agreed that one officer from each NPA attends all the Forums in each NPA (i.e. the same three officers (one from each NPA) run the Forums in all three Parks).
3. Standardised approaches to recording information					
3.1 Standard planning service questionnaire.	DM&E, Policy, Comm	Yes.	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels. Stakeholder perception may be improved if three NPAs show they are taking a consistent approach.	**Moderate change** – would need one NPA to take the lead and send around a draft template for the planning service questionnaire. Relevant officers in each NPA could then add to/amend with their own examples and then seek sign-off from Directors of Planning (or Heads of DM&E). However, standardising this questionnaire is dependent upon the

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
					three NPAs agreeing the same set of key performance indicators (see 3.3 below), and potentially also their approach to LDP monitoring (3.4).
3.2 Standard customer service questionnaire	Comm, DM&E, Policy	Yes.	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels. Stakeholder perception may be improved if three NPAs show they are taking a consistent approach.	**Minor change** – would need one NPA to take the lead and send around a draft template for the customer service questionnaire (PCNPA has already used SNPA's questionnaire, which could be the template for all three). Relevant officers in each NPA could then add to/amend with their own examples and then seek sign-off from Directors of Planning.
3.3 Standard set of key performance indicators.	DM&E, Policy	Yes, but may be in the longer term.	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels.	**Moderate change** – would need Directors of Planning in each NPA to agree the standard set of key performance indicators and how they will be measured. This may require a working group to draft the set of indicators and how they are measured, plus potentially a number of meetings before they are agreed.
3.4 Increased liaison in relation to LDP monitoring.	Policy	Yes, but may be in the longer term, as likely to need standard LDP policies and	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Major change** – would need a review of current LDP monitoring indicators in each NPA, to identify common indicators or areas that could be more consistently monitored, and then for Heads of Policy and Directors of Planning to agree the approach to LDP monitoring. This may require a working group to carry out the

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
		integrated IT system.			review of current monitoring indicators etc., plus potentially a number of meetings before they are agreed.
4. Joint approaches to preparation of advice notes/policy/position statements					
4.1 Produce planning advice notes/leaflets/basic guidance notes in collaboration.	DM&E, Comm	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Minor change** - would need one NPA to take the lead and send around a draft template for the advice note/leaflet/guidance note. Relevant officers in each NPA could then add to/amend and then seek sign-off from Directors of Planning (or relevant Service Heads).
4.2 Joint responses to WG consultations.	All (depending on topic covered)	Yes.	Yes it would be effective and efficient.	It would be likely to deliver the same level of service for lower cost of delivery than current levels.	**Minor change** – this is being done already on an ad hoc basis between the three NPAs. One or more officers take the lead on circulating draft responses to other relevant officers (depending on topic covered) for comment/amendment. However, NPW could potentially take a greater role in co-ordinating these responses.
4.3 Joint working on policy making (LDPs and National Park Management Plans)	Policy	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Moderate change** – this could be achieved on an ad hoc informal basis via email between relevant Policy officers to discuss and compare policy wording. However, it could be an opportunity for sharing experience and/or secondments of policy officers between NPAs during key policy drafting

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
					periods (see also opportunity 7.1 below).
4.4 Production of joint position statements.	All except Comm (depending on topic covered)	Yes.	Yes it would be effective and efficient.	It would be likely to deliver the same level of service for lower cost of delivery than current levels.	**Minor change** – would need one or more officers to take the lead on developing and circulating draft joint position statements to other relevant officers (depending on topic covered) for comment/amendment. However, NPW could potentially take a greater role in co-ordinating this.
4.5 Preparation of joint SPGs.	All except Comm (depending on topic covered)	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Minor change** – this is being done already on an ad hoc basis between the three NPAs. One or more officers/NPAs take the lead on developing and circulating draft to other relevant officers (depending on topic covered) for comment/amendment. Sometimes there is joint commissioning of external consultants to prepare the joint SPG (see also opportunity 9.1 below).
4.6 Standard advice on protected species and for ecological surveys.	L/scape	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Minor change** - would need one NPA to take the lead and send around a draft template for the advice. Relevant officers in each NPA could then add to/amend and then seek sign-off from Directors of Planning (or relevant Service Heads).

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
5. Sharing of specialist knowledge					
5.1 Regular meetings between equivalent NPA officers.	All	Yes.	Yes it would be effective and efficient (as would encourage pro-active sharing of knowledge/ experience, helping to reduce reinventing the wheel).	It would be likely to deliver an improved service for the same cost as current levels (although there will be some costs associated with travelling to and attending meetings).	**Minor change** – meetings have occurred in the past, just needs a more proactive and organised approach to establishing annual face-to-face meetings with more regular video-conferencing in between for different planning services.
5.2 Sharing research and technical expertise for informing LDP work.	Policy	Yes.	Yes it would be effective and efficient (as would encourage pro-active sharing of knowledge/ experience).	It would be likely to deliver an improved service for the same cost as current levels.	**Minor change** – as above for opportunity 5.1 – this could be achieved as part of the regular meetings between policy officers in the three Welsh NPAs, but also through the use of the shared research database (see opportunity 1.4), and continued ad hoc phone calls/emails to equivalent officers in each NPA.
5.3 Provision of building conservation advice by the CADW delegated LPAs (includes PCNPA, Pembrokeshire, Monmouthshire and Vale of Glamorgan – these LPAs have developed experience and skills which could be made available to BBNPA and SNPA if needed).	LB&CA	Yes.	Yes it would be effective and efficient (as would encourage pro-active sharing of knowledge/ experience).	It would be likely to deliver an improved service for the same cost as current levels.	**Minor change** – would just need BBNPA and SNPA to contact one of the CADW delegated LPAs when needed (including PCNPA). However, this is not so much of an opportunity for joint working exclusively between the NPAs, as could involve one of the other CADW delegated LPAs.

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
6. Shared officers / roles					
6.1 Informal sharing of officers between NPAs at times of need (e.g. to cover illness, long term leave, specific busy period).	All	Potentially (depends on relevant staff availability and workload).	Yes it would be effective and efficient (as may reduce need to recruit new staff).	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Moderate change** – would involve behavioural change, i.e. instead of turning to neighbouring/constituent LPAs in first instance, NPAs could check with the other two NPAs for specialist staff availability first.
6.2 Sharing of specialist officers/teams between all three NPAs (e.g. ecology team or conservation officer etc. in one NPA could provide service to all three NPAs, or amalgamated team of officers from the three NPAs).	All (but likely to be more specialised i.e. LB&CA, Arch, L/scape)	Potentially, but issues with site visits and local knowledge would need to be overcome.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Major change** – would involve change in staff structures within some NPAs due to one team serving all three NPAs, plus could involve new recruitment, e.g. of a landscape officer(s).
6.3 Mentoring of new staff in post to cover e.g. maternity leave, by relevant/equivalent NPA officers in other NPAs.	All	Potentially (depends on relevant staff availability and workload).	Yes it would be effective and efficient.	It would be likely to deliver an improved service for the same cost as current levels.	**Moderate change** – would involve behavioural change, i.e. instead of turning to neighbouring/constituent LPAs in first instance, NPAs could check with the other two NPAs if equivalent officers available (i.e. to the officer on maternity leave) to provide mentoring role to new staff.
6.4 Centralisation of press and PR.	All, but not provided by Planning (Corporate	Potentially in the longer term.	Yes it would be effective and efficient.	It would be likely to deliver equivalent a service at a lower cost.	**Major change** – would potentially involve structural change if one Press/PR team was to serve all three NPAs. However, as Press/PR resides in Corporate Services, it is discounted as a

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service? (Services)	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
					joint working opportunity for consideration in this study.
7. Secondment of staff					
7.1 Secondment of officers between NPAs at times of need (e.g. to cover illness, long term leave, specific busy period).	All	Potentially (depends on relevant staff availability and workload).	Yes it would be effective and efficient (as may reduce need to recruit new staff).	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost.	**Moderate change** – would involve behavioural change, i.e. instead of turning to neighbouring/constituent LPAs in first instance, NPAs could check with the other two NPAs for specialist staff availability first. Would also require formal secondment arrangements to be put in place (e.g. payment etc.)
8. Buying into other NPA's services through SLA					
8.1 SLAs for processing planning applications.	DM	Yes, but integrated IT system would facilitate, so longer term.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost. In fact, it would provide an income for the NPA carrying out the planning application processing.	**Moderate change** – would involve behavioural change, i.e. instead of SLAs with neighbouring/constituent LPAs, NPAs could set up SLAs between them. **Major change** –an integrated IT system for planning services would facilitate this.
8.2 SLAs for policy making	Policy	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and potentially improved service at a lower cost. In fact, it would provide an income for the NPA providing the policy officers.	**Moderate change** – would involve behavioural change, i.e. instead of SLAs with neighbouring/constituent LPAs, NPAs could set up SLAs between them.
8.3 Potential for SLA between Archaeology	Arch,	Yes, but not a SLA	Not necessarily more effective and efficient	It might deliver the same level of service for lower cost of delivery	**Major change** – would involve changing current SLAs with constituent

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
Cymru[4]/ and NPAs	DM&E.	between NPAs.	than current SLAs.	than current levels (although BBNPA found this was not the case).	LPAs or use of in-house expertise.
9. Joint framework agreements e.g. with specialist consultants or for legal advice					
9.1 Joint approach to procurement of specialist advice that is not often required, e.g. low impact development applications.	All	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not repeating work commissioned by one of the other NPAs.	**Minor change** – this has happened previously and would need more regular communication between NPAs to either check if specialist advice has already been sought, or to take the lead on commissioning the research, but checking first with the other NPAs if they would like to do it jointly. This could be facilitated by the regular meetings to be held between NPA officers (see 5.1 above).
9.2 Joint approach to procurement of landscape advice.	DM&E, L/scape	Yes.	Yes it would be effective and efficient, as no landscape officers currently in the NPAs.	Both – it would be likely to deliver equivalent and improved service at a lower cost (as landscape expertise not currently available within the NPAs).	**Moderate change** – would require agreement to commission consultants to provide landscape advice on a call-off framework contract, agreement regarding the brief, funding and then commissioning.
9.3 Joint approach to procurement of community participation and engagement advice/facilitation. (Could be through SLA with Planning Aid Wales.)	Comm	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not having to commission service separately.	**Moderate change** – would require agreement to commission consultants to provide community participation and engagement advice/facilitation on a call-off framework contract, agreement regarding the brief, funding and then commissioning.

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[4] http://www.archaeologycymru.co.uk/ Archaeology Cymru is a professional organisation for all those interested in archaeology and offer a full contractual service for archaeological building mitigation.

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
9.4 Jointly procuring legal advice on planning applications.	DM	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not repeating work commissioned by one of the other NPAs.	**Moderate change** – BBNPA already provides legal advice for PCNPA committees, and this could potentially be widened to SNPA as well. However, the general planning legal advice for applications, enforcement etc. would be different and supplied via legal consultants. Therefore, would require agreement to commission legal firm to provide legal advice on a call-off framework contract, agreement regarding the brief, funding and then commissioning.
9.5 Jointly procuring legal advice on enforcement.	DM&E	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not repeating work commissioned by one of the other NPAs.	**Moderate change** – would require agreement to commission consultants to provide legal advice on a call-off framework contract, agreement regarding the brief, funding and then commissioning.
9.6 Shared approach to S.106 administration – drawing up the agreement with solicitors.	DM	Yes.	Yes it would be effective and efficient.	It would be likely to deliver equivalent service at a lower cost.	**Moderate change** – could be covered as part of the legal advice framework contract (see 9.4), therefore, would require agreement to commission consultants to provide legal advice on a call-off framework contract, agreement regarding the brief, funding and then commissioning.
9.7 Joint procurement of technical studies for LDPs (including SEA)	Policy	Yes.	Yes it would be effective and efficient.	Both – it would be likely to deliver equivalent and improved service at a lower cost, due to efficiencies gained from not	**Minor change** – would need more communication between NPAs to either check if technical studies have already been undertaken, or to take the lead on

Opportunities for joint working/collaboration/sharing services	Relevant to which planning service?	Realistic? (Yes, No, Potentially)	Effective (Yes, No) and Efficient (Yes, No)	Economic? (Equivalent service at lower cost or better service at same cost?)	Workable? (Major, moderate or minor change needed)
				repeating work commissioned by one of the other NPAs.	commissioning the research, but checking first with the other NPAs if they would like to do it jointly. This could be facilitated by the regular meetings to be held between NPA officers (see 5.1 above), as well as the creation of the tendering/research database (see 1.4 above).

4   Recommendations

Introduction

One Welsh National Park Authority?

4.1   Clearly, the ultimate form of joint working would be for all three Welsh NPAs to become a joint Local Planning Authority, possibly following the unitary authority model (e.g. Cornwall Council) where all planning responsibilities and activities are subsumed into the single authority through centralised teams, but with a planning presence (e.g. development management officers) maintained in local outposts in the different National Park areas.

4.2   However, **amalgamation of the three Welsh NPAs has been discounted in this study** for the following reasons:

1   There are a number of services (not just planning) that each NPA provides, which need to continue to be delivered locally.

2   Each NPA already has strong joint working relationships with one or more of its constituent LPAs, and this forms a very important component of planning service delivery.

3   There is a need to focus NPA activity on promoting understanding and enjoyment of what is special about each National Park.

Overarching recommendations

4.3   In our view, **there is a longer term opportunity for there to be much closer working between the three Welsh NPAs**, particularly in relation to:

1   **Local Development Plan preparation** – while each NPA needs to prepare their own LDP, there are a number of overarching policies, strategic approaches (e.g. to affordable housing delivery) and also development management policies that could be consistent between the three NPAs. Policy officers from each NPA could work together as a more centralised team on developing consistent policies for each LDP as well as sharing and jointly commissioning background research to inform policies. Recent communication from the planning minister Carl Sargeant at the RTPI's Wales Planning Conference in Cardiff on 5th June 2013 was that the Welsh Government is considering taking steps to boost collaboration between Welsh planning authorities on local development plan preparation. He noted that if he felt legislation was needed to deliver improvements in local planning authority performance, it would be introduced through the Planning Reform Bill.

2   **Major development proposals** – such that specialist expertise is shared across the NPAs. Each NPA would retain its development management officers, but those working on major applications would work together with equivalent officers in the other two NPAs as a centralised virtual team, with officers still based in their respective LPAs but consistently working together as a unified team.

3   **Creation of other specialist teams** (e.g. ecology, conservation, landscape) that are shared or part-shared between the three NPAs.

4.4   We recognise that achieving the above in the longer term would require quite significant changes in cultures, structures and systems within the Planning departments of the three NPAs.

4.5   The cultural and behavioural change would be needed to ensure that while each NPA would still have its own strong geographic focus, they would have joint systems and approach planning service delivery in the same way, which would make it easier for the NPAs to work together, and also easier for the public and stakeholders because they would know what to expect from planning services in the NPAs.

4.6   The key systems requirement that would facilitate more joint working would be the purchase and implementation of an integrated IT system, which would enable all NPAs access to the same information (e.g. planning application files, GIS etc.).

4.7   In addition, creating a consistent outward facing profile to demonstrate joint working would greatly benefit from a co-ordinated updating of each NPA's website, such that the individual websites and identities are maintained but that they contain the same messages and information with respect to planning.

4.8   Our recommendations for joint working are therefore considered to be realistic steps towards much closer working between the NPAs. The individual recommendations below could be an end in themselves but also form part of a bigger picture of more cohesive and consistent planning delivery across the Welsh NPAs where there is: learning and implementing of best practice from each other, sharing routine tasks following common approaches, and becoming more outward facing and customer focused. These are not proposals to dilute the identity of the individual National Park Authorities but they are recommendations to deliver planning in a more cost effective and joined up fashion.

Detailed recommendations

4.9   Based on our evaluation of the identified opportunities for joint working/collaboration, there are a number of opportunities that have the potential to provide benefits in terms of efficient and effective service delivery and potential cost-savings in the longer term. Our recommendations are grouped into the following categories (numbering relates to the opportunity numbers used in **Table 3.1**):

- '**Quick wins**' – those opportunities for joint working/collaboration that could quickly and easily be implemented without any or much change to current structures, systems and processes. Opportunities identified as quick wins are as follows:

    - 1.4 Create a joint 'tendering'/research database to log projects that each NPA has undertaken or commissioned, to enable sharing of information.
    - 2.3 Planning Appeal statements – standardised approach for generic issues, plus share information on specific types of appeals.
    - 3.2 Standard customer service questionnaire
    - 4.1 Produce planning advice notes/leaflets/basic guidance notes in collaboration.
    - 4.2 Joint responses to WG consultations.
    - 4.4 Production of joint position statements.
    - 4.5 Preparation of joint SPGs.
    - 4.6 Standard advice on protected species and for ecological surveys.
    - 5.1 Regular meetings between equivalent NPA officers.
    - 5.2 Sharing research and technical expertise for informing LDP work.
    - 9.1 Joint approach to procurement of specialist advice that is not often required, e.g. low impact development applications.
    - 9.7 Joint procurement of technical studies for LDPs (including SEA)

- **Shorter term** – those opportunities that should not require significant changes to current structures, systems and processes, and that have the potential to be implemented in the shorter term, e.g. within 6-18 months. Opportunities identified as able to be implemented in the shorter term are as follows:

    - 1.5 Use of Planning Aid Wales (for Community Engagement exercises).
    - 2.1 Validation of planning applications.
    - 2.6 Joint training of staff and Members.
    - 2.8 Common approach to websites and awareness raising.
    - 2.10 Establishing and running Planning Forum in each NPA to help to monitor planning service delivery with local stakeholders.
    - 3.1 Standard planning service questionnaire.
    - 3.3 Standard set of key performance indicators.
    - 4.3 Joint working on policy making (LDPs and National Park Management Plans).

- 6.1 Informal sharing of officers between NPAs, at times of need (e.g. to cover illness, long term leave, specific busy period).
- 6.3 Mentoring of new staff in post to cover e.g. maternity leave, by relevant/equivalent NPA officers in other NPAs.
- 7.1 Secondment of officers between NPAs at times of need (e.g. to cover illness, long term leave, specific busy period).
- 8.1 SLAs for processing planning applications.
- 8.2 SLAs for policy making
- 9.2 Joint approach to procurement of landscape advice.
- 9.3 Joint approach to procurement of community participation and engagement advice/facilitation. (Could be through SLA with Planning Aid Wales.)
- 9.4 Jointly procuring legal advice on planning applications.
- 9.5 Jointly procuring legal advice on enforcement.
- 9.6 Shared approach to S.106 administration – drawing up the agreement with solicitors.

- **Longer term** – those opportunities that may be more challenging to implement as they would require significant changes to current structures, systems and processes, and therefore their implementation would happen over the longer term, e.g. more than 18 months. Opportunities identified for consideration in the longer term are as follows:

  - 1.1 Centralised administration of planning applications.
  - 1.2 Integrated IT system for all planning services.
  - 1.3 Integrated Geographic Information System and joint licences for GIS software.
  - 3.4 Increased liaison in relation to LDP monitoring.
  - 6.2 Sharing of specialist officers/teams between all three NPAs (e.g. ecology team or conservation officer etc. in one NPA could provide service to all three NPAs). Could also be applied to creation of a new 'major' or 'specialist' development management team, which combines experienced DM officers from each NPA to work together on major/specialist applications (e.g. pipelines).

- **Discounted options** – a small number of the opportunities identified were not considered worth pursuing based on our evaluation, as they are unlikely to deliver any benefits in terms of being more effective, efficient or economical, or they are not opportunities for joint working exclusively between the NPAs (i.e. they could involve other Welsh LPAs), or they are not opportunities that could be pursued/implemented by the Planning Departments. These discounted opportunities are as follows:

  - 2.2 Common approaches to Committee Meetings.
  - 2.4 Standard schemes of delegation.
  - 2.5 Common approach to pre-application advice (due to waiting instead for Welsh Government's protocol to come out, which will aim for consistency across all the LPAs).
  - 2.7 Collaboration on minerals and waste policy.
  - 2.9 Common or joint approach to consultation databases or mailouts.
  - 5.3 Provision of building conservation advice by the CADW delegated LPAs.
  - 6.4 Centralisation of press and PR.
  - 8.3 Potential for SLA between Archaeology Cymru/ and NPAs.

Quick Wins

4.10   **Table 4.1** sets out the opportunities for joint working/collaboration that are recommended for implementation immediately, as they could be implemented without any change to current structures, systems and processes, and have the potential to provide benefits in terms of efficient and effective service delivery and potential cost-savings in the longer term.

Table 4.1: Recommendations for Quick Win joint working opportunities

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
1.4 Create a joint 'tendering'/research database	Creation of a database (could be a simple Excel	Would need one NPA to take the lead to create and maintain

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
to log projects that each NPA has undertaken or commissioned, to enable sharing of information.	spreadsheet). Regular prompts (e.g. monthly or quarterly) to each NPA to ensure all projects are logged.	the database (including sending reminder emails to the other two NPAs), but with regular input from one or more officers in the other two NPAs to keep up to date. Suggested service lead = Policy. Lead responsibility could rotate between the NPAs annually.
2.3 Planning Appeal statements – standardised approach for generic issues, plus share information on specific types of appeals.	Circulation of a draft template of standard text for dealing with common/generic issues arising from appeals. Regular prompts (e.g. monthly or quarterly) to each NPA to remind to share examples of approaches taken to recent appeals. (This could also happen at regular meetings between the NPAs, see opportunity 5.1).	Would need one NPA to take the lead to draft the template (including sending reminder emails to the other two NPAs), but with regular input from one or more officers in the other two NPAs to keep up to date. Suggested service lead = Development Management. Lead responsibility could rotate between the NPAs annually.
3.2 Standard customer service questionnaire	Agreement on the standard questionnaire content. Co-ordinated use and updates of the questionnaire to ensure continues to be consistent.	SNPA could take the lead and send their template for the planning service questionnaire to BBNPA (PCNPA already uses it). One NPA could then take the lead to send questionnaire to the other two NPAs, perhaps annually to ensure consistency and keep it up to date. Sign-off from Director of Planning. Suggested service lead = communications/customer service team.
4.1 Produce planning advice notes/leaflets/basic guidance notes in collaboration.	Development and circulation of a draft template for advice note/leaflet/guidance note.	Would need one NPA to take the lead and send around a draft template for the advice note/leaflet/guidance note. Relevant officers in each NPA could then add to/amend and then seek sign-off from Directors of Planning (or relevant Service Heads). Suggested service lead = Depends on topic to be covered.

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
4.2 Joint responses to WG consultations.	Development and circulation of a draft consultation response to relevant officers.	Already being done already on an ad hoc basis between the three NPAs. One or more officers take the lead on circulating draft responses to other relevant officers (depending on topic covered) for comment/amendment. Suggested service lead = Depends on topic to be covered. However, NPW could potentially also take a greater role in co-ordinating these responses.
4.4 Production of joint position statements.	Development and circulation of a draft joint position statements to relevant officers.	One or more officers take the lead on circulating draft responses to other relevant officers (depending on topic covered) for comment/amendment. Suggested service lead = Depends on topic to be covered. However, NPW could potentially also take a greater role in co-ordinating this.
4.5 Preparation of joint SPGs.	Development and circulation of a draft SPG to relevant officers. May require meetings to agree content.	Already being done already on an ad hoc basis between the three NPAs. One or more officers take the lead on circulating draft SPG content to other relevant officers (depending on topic covered) for comment/amendment. Each NPA then tailors SPG to their National Park. Sometimes commissioning of external consultants is needed. Suggested service lead = Policy, but also depends on topic to be covered.
4.6 Standard advice on protected species and for ecological surveys.	Development and circulation of a draft template for advice.	Would need one NPA to take the lead and send around a draft template for the advice. Relevant officers in each NPA

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
		could then add to/amend and then seek sign-off from Directors of Planning (or relevant Service Heads). Suggested service lead = Landscape, trees and hedges.
5.1 Regular meetings between equivalent NPA officers.	Annual/bi-annual (or more) face-to-face meetings with more regular video-conferencing in between for different planning services. meeting could be for all planning officers, with general planning issues covered in the morning (e.g. Welsh Government directives/consultations), and then break out groups into different planning service areas in the afternoon.	Would need one NPA (on a rotating basis) to take the lead and draw up a programme of annual meetings, book meeting rooms (e.g. at Ceredigion Council in Aberystwyth), and send emails out to relevant NPA officers for confirmation of dates, agenda and attendance. Or NPW could take on the organisational role for these meetings. Each planning service area could organise their own more regular video-conference meeting agendas and dates between their equivalent officers. Directors of Planning should take overview to ensure efficient use of officer time.
5.2 Sharing research and technical expertise for informing LDP work.	As above for opportunity 5.1 – this could be achieved as part of the regular meetings between policy officers in the three Welsh NPAs, but also through the use of the shared research database (see opportunity 1.4), and continued ad hoc phone calls/emails to equivalent officers in each NPA.	Would need policy officers in each NPA to proactively email/call equivalent officers to share knowledge, but also to ensure that useful research is shared as part of the regular meetings agendas. Suggested service lead = Policy.
9.1 Joint approach to procurement of specialist advice that is not often required, e.g. low impact development applications.	More communication between NPAs to either check if specialist advice has already been sought, or to take the lead on commissioning the research, but checking first with the other NPAs if they would like to do it jointly. Communication could be facilitated by the regular meetings to be held between NPA officers (see 5.1 above).	Relevant NPA officers in need of the specialist advice. Directors of Planning sign-off for funding the specialist advice.

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
	Commissioning of specialist advice.	
9.7 Joint procurement of technical studies for LDPs (including SEA)	More communication between NPAs to either check if technical studies have already been undertaken, or to take the lead on commissioning the research, but checking first with the other NPAs if they would like to do it jointly. Communication could be facilitated by the regular meetings to be held between NPA officers (see 5.1 above), as well as the creation of the tendering/research database (see 1.4 above). Commissioning of consultants to do technical research/SEA.	Relevant NPA officers in need of the technical studies. Directors of Planning sign-off for funding the studies. Suggested service lead = Policy.

Shorter term

4.11   **Table 4.2** sets out the opportunities for joint working/collaboration that are recommended for implementation in the shorter term (e.g. 6-18 months), as they could be implemented without significant change to current structures, systems and processes, and have the potential to provide benefits in terms of efficient and effective service delivery and potential cost-savings in the longer term.

Table 4.2: Recommendations for joint working opportunities to be implemented in the shorter term

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
1.5 Use of Planning Aid Wales (for Community Engagement exercises).	Preparation of a brief for requirements (depending on stage of LDP preparation, or planning application that is being consulted on). Discussions with Planning Aid Wales to agree what they can offer/provide, and commissioning of the service. NPA officers could be seconded to Planning Aid Wales to learn and carry out the engagement, then return to relevant NPA able to continue to use and apply that knowledge and experience.	A working group of officers from each NPA could develop the brief and hold the discussions with Planning Aid Wales (sign off from Directors of Planning). Commissioning could be jointly or separately by the NPAs. Seconded NPA officers. Suggested service lead = Policy.
2.1 Validation of planning	Agreement on the standardised procedure for	A working group to agree the standardised procedure for

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
applications.	validating planning applications.

Training for each NPA's administration team in the new procedure. | validating planning applications (with sign-off from Directors of Planning).

One or two officers to train the three NPA's administration team.

Suggested service lead = DM&E/Administration teams. |
| 2.6 Joint training of staff and Members. | There are existing presentations prepared by WLGA that could be used and adapted to suit NPA purposes, and training could be delivered by suitable NPA officers (interested and experienced at training).

SNPA provides initial training for new NP officers (UK wide), but follow up/improver training sessions could be implemented, potentially as part of the regular meetings between relevant NPA officers (see opportunity 5.1).

Development of a training programme, i.e. topics to be covered, who provides training, how often, where. | SNPA likely to continue to provide training for new NP officers.

Member training could use a working group of officers from each NPA to develop the programme from the WLGA material and determine training providers (may be internal NPA officers, or could be external, e.g. RTPI, consultants).

Commissioning could be jointly or separately by the NPAs.

Officer improver training (e.g. on specific planning topics as needed) could also be commissioned, e.g. RTPI, or done more informally by internal NPA officers at the regular meetings.

NPAs could do joint applications for Planning Improvement Fund.

Suggested service lead = Policy. |
| 2.8 Common approach to websites and awareness raising. | Circulation of draft standard text for website material relevant to each planning service area.

Regular prompts (e.g. quarterly) to each NPA service area lead for review and update of material if necessary. | Would require one 'webmaster' for all three NPAs (and potentially for each of the service areas e.g. Listed Buildings & Conservation, Archaeology etc.) to ensure that material is consistent and up to date.

Suggested service lead = All.

Lead responsibility could rotate between the NPAs annually. |
| 2.10 Establishing and running Planning Forum in each NPA to help to monitor planning | Agreement on the standard procedure for running Planning Forums. | A working group to develop and agree the standard procedure for running Planning |

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
service delivery with local stakeholders.	Training for relevant officers in each NPA in the new approach.	Forums (with sign-off from Directors of Planning). One or two officers to train the three NPA's relevant officers, who will then take responsibility for running the Forums at regular intervals. May require or be agreed that one officer from each NPA attends all the Forums in each NPA. Suggested service lead = DM&E.
3.1 Standard planning service questionnaire.	Agreement on the standard questionnaire content and performance indicators (see 3.3 below). Co-ordinated use and updates of the questionnaire to ensure continues to be consistent.	One NPA to take the lead and send around a draft template for the planning service questionnaire. Relevant officers in each NPA could then add to/amend with their own examples and then seek sign-off from Directors of Planning (or Heads of DM&E). Suggested service lead = DM&E.
3.3 Standard set of key performance indicators.	Agreement on the standard set of key performance indicators. Co-ordinated use and updates of the indicators to ensure monitoring and measurement of indicators continues to be consistent.	A working group to establish set of key performance indicators and then seek sign-off from Directors of Planning. Suggested service lead = Policy and/or DM&E.
4.3 Joint working on policy making (LDPs and National Park Management Plans)	Either ad hoc, informal advice sharing on policy wording, or, secondment of policy officers between NPAs during key policy drafting periods (see also opportunity 7.1 below). Formal secondment arrangements to be put in place through HR/Finance (e.g. payment etc.)	Policy officers via email/telephone/meetings. Seconded policy officers. Suggested service lead = Policy.
6.1 Informal sharing of officers between NPAs, at times of need (e.g. to cover illness, long term leave, specific busy period).	Behavioural change, i.e. instead of turning to neighbouring/constituent LPAs in first instance, NPAs could check with the other two NPAs for specialist staff availability first.	Directors of Planning and/or Heads of Services. Relevant officers.

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
6.3 Mentoring of new staff in post to cover e.g. maternity leave, by relevant/equivalent NPA officers in other NPAs.	Behavioural change, i.e. instead of turning to neighbouring/constituent LPAs in first instance, NPAs could check with the other two NPAs if equivalent officers available (i.e. to the officer on maternity leave) to provide mentoring role to new staff. Mentoring could be provided by a visit to the other NPA initially when the new staff member starts to help with induction, then telephone/email advice as needed during their contract.	Directors of Planning and/or Heads of Services. Relevant officers providing mentoring role.
7.1 Secondment of officers between NPAs at times of need (e.g. to cover illness, long term leave, specific busy period).	Behavioural change, i.e. instead of turning to neighbouring/constituent LPAs in first instance, NPAs could check with the other two NPAs for specialist staff availability first. Formal secondment arrangements to be put in place through HR/Finance (e.g. payment etc.)	Directors of Planning and/or Heads of Services. Seconded officers.
8.1 SLAs for processing planning applications.	Behavioural change, i.e. instead of SLAs with neighbouring/constituent LPAs, NPAs could set up SLAs between them. However, an integrated IT system for planning services would facilitate this happening, which is a longer term proposal (see 1.2 below).	Directors of Planning and/or Heads of Services. NPA officers involved in processing planning applications. Suggested service lead = Development Management.
8.2 SLAs for policy making	Behavioural change, i.e. instead of SLAs with neighbouring/constituent LPAs, NPAs could set up SLAs between them.	Directors of Planning and/or Heads of Services. NPA officers involved in policy making. Suggested service lead = Policy.
9.2 Joint approach to procurement of landscape advice.	Would require agreement to commission consultants to provide landscape advice on a call-off framework contract. Development of a brief,	Directors of Planning. Could task a working group of NPA officers to prepare the brief, be involved in reviewing submissions, appointing

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
	agreement regarding the brief, funding and then commissioning the consultants. Project management of the framework contract.	consultants. One NPA officer would need to be the nominated project manager for the framework contract. Suggested service lead = Policy, Development Management, or Landscape/Trees/Hedges.
9.3 Joint approach to procurement of community participation and engagement advice/facilitation. (Could be through SLA with Planning Aid Wales.)	As above for 9.2.	As above for 9.2. Suggested service lead = Policy.
9.4 Jointly procuring legal advice on planning applications.	As above for 9.2. Could make use of a standard proforma that NPAs could issue to legal advisors (e.g. PCNPA has one that they send to their legal advisors when requesting advice).	As above for 9.2. Suggested service lead = Development Management.
9.5 Jointly procuring legal advice on enforcement.	As above for 9.2 and 9.4.	As above for 9.2. Suggested service lead = Enforcement.
9.6 Shared approach to S.106 administration – drawing up the agreement with solicitors.	Could be implemented as part of the legal advice framework contract (9.4 above). As above for 9.2.	As above for 9.2. Suggested service lead = Development Management.

Longer term

4.12 **Table 4.3** sets out the opportunities for joint working/collaboration that are recommended for consideration for implementation in the longer term (e.g. greater than 18 months), as they would require significant changes to current structures, systems and processes. However, these opportunities have the potential to provide significant benefits in terms of efficient and effective service delivery and potential cost-savings in the longer term.

Table 4.3: Recommendations for joint working opportunities to be implemented in the longer term

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
1.1 Centralised administration of planning applications.	Co-ordinated purchase, integration and implementation of the same IT system and networks (see 1.2 below).	A joint working group could be established to research and purchase the IT system (with decision-making by the Directors of Planning in all

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
	Co-ordinated use of the system to ensure all administration of planning applications done in the same way.	three NPAs) (see 1.2 below). The administration of planning applications could either be done by administration teams in each NPA, or, one NPA could take on the administration for all three.
1.2 Integrated IT system for all planning services.	As above – co-ordinated purchase, integration and implementation of the same IT system and networks. All NPAs need to be on the same network and be able to access the system from any NPA office (or home working location etc.)	As above – a joint working group could be established to research and purchase the IT system (with decision-making by the Directors of Planning in all three NPAs). Wider liaison with other departments likely to be required.
1.3 Integrated Geographic Information System and joint licences for GIS software.	Co-ordinated purchase and implementation of the same integrated GIS system, and joint licences for GIS software to help ensure that all NPAs have same base layers and basic information. Co-ordinated use of the GIS system to ensure GIS used consistently, plus any initiatives could be shared between all three NPAs (e.g. mapping of wind farm applications received/declined/permitted).	A joint working group could be established to research and purchase the GIS system and software licences (with decision-making by the Directors of Planning in all three NPAs, or other relevant department heads). One NPA could take the lead in co-ordinating use of the GIS system, and ensure regular communication between the GIS officers in the three NPAs via tele/video conference call. Responsibility likely to be in another department (not Planning).
3.4 Increased liaison in relation to LDP monitoring.	Agreement on common LDP monitoring indicators and approach to measuring achievement. May need standard LDP policies, as well as integrated IT system (see 1.2 above). Co-ordinated use and updates of the indicators to ensure monitoring and measurement of indicators continues to be consistent.	A working group to review current LDP monitoring indicators in each NPA, to identify common indicators or areas that could be more consistently monitored, and then for Heads of Policy and Directors of Planning to agree the approach to LDP monitoring. Suggested service lead = Policy.
6.2 Sharing of specialist officers/teams between all	Review of existing specialist officers/teams to identify	Directors of Planning and relevant Heads of Service to

Joint working opportunity	What's needed to implement it	Key players (or Roles and Responsibilities)
three NPAs (e.g. ecology team or conservation officer etc. in one NPA could provide service to all three NPAs).	whether one NPA's officers/team could provide service for all three NPAs, or amalgamation of teams to create more joined up working between the three NPAs on particular service areas, e.g. archaeology, listed buildings and conservation, landscape, trees/hedges and ecology. This could also be applied to creation of a new 'major' or 'specialist' applications development management team, which combines experienced DM officers from each NPA to work together on major/specialist applications (e.g. pipelines). Potential recruitment of new specialist officer(s) (e.g. landscape specialist).	review working arrangements of specialist teams and extent to which one officer/ team could provide service for all three NPAs, as well as need for recruitment of new specialist staff (e.g. landscape).

Next steps

4.13   LUC looks forward to discussing the findings of the evaluation and our draft recommendations set out in this Interim Report with the Steering Group at our meeting in Cardiff on 1st July 2013. As set out in our submission, this meeting would be a chance for the Steering Group to review the draft recommendations and discuss the merits or otherwise of each one, in this way helping to shape the final recommendations to be included in the Final Report.

Annex 10

Welsh Government vision for National Parks (2007 Policy Statement)

The Welsh National Parks are protected landscapes of international importance which capture much of what is distinct and special about rural Wales, environmentally and culturally. Although predominantly rural in nature, the Parks contain a resident population of over 80,000, are close to important urban communities and have significant potential to enrich the lives of the people of, and visitors to, Wales and to contribute positively to public health and well-being and to the Welsh economy. They are living landscapes, moulded by their communities over thousands of years. They are places where sustainable development is promoted for the benefit of the environment, the economy and for Park communities. They are places that experiment with new approaches in sustainable development and environmental conservation, providing exemplars of best practice for wider Wales, and helping to shape and lead future rural policy and practice. They are also places where all who can influence the future of the Parks work together to conserve and enhance their natural beauty, biodiversity and cultural identity, in line with sustainable development principles. Guided by the Park Authorities, these special areas are becoming progressively richer and more diverse in terms of landscape, wildlife and heritage and are enjoyed and cherished by a full cross-section of society.'