

Natural Resources Wales

Planning Services Review in the context of a proposed National Park in Wales

Final Report

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1. Introduction

1.1 Background

In its Programme for Government (2021-2026), Welsh Government sets out its intention to designate a new National Park in Wales based on the existing Clwydian Range and Dee Valley Area of Outstanding Natural Beauty or AONB (now known as a 'National Landscape'). If established, it would be the fourth National Park in Wales, and the first since 1957.

Natural Resources Wales (NRW) is the Welsh Government's statutory adviser on landscape and natural beauty and the designating authority for any new National Parks and National Landscapes. The Welsh Government has asked NRW, as Designating Authority, to take forward a formal designation programme to assess the case for the proposed new National Park.

The area being assessed is larger than the existing National Landscape and brings in additional areas in Gwynedd, Wrexham, Denbighshire and Powys.

NRW held a consultation on a Candidate National Park Area between October and December 2024. The need for clarity on the potential impact of a National Park with its own Planning Authority on the existing planning services emerged as a key theme of the response from the relevant Local Authorities.

The NRW Designated Landscapes Programme Team has appointed Arup to identify the potential implications of a National Park Planning Authority on the operation and delivery of the Planning Service across Local Authorities and the Corporate Joint Committees (CJCs) within the Candidate National Park Area.

1.2 National Parks in Wales

National Parks are managed areas of outstanding landscape in Wales, with the first National Park created in 1951 following the creation of the National Parks and Access to the Countryside Act 1949. There are three National Parks in Wales currently; Eryri (Snowdonia), designated in 1951, Pembrokeshire Coast, designated in 1952, and Bannau Brycheiniog (the Brecon Beacons), designated in 1957¹. National Parks cover more than 20% of the land surface of Wales (approximately 4,000km²) and have a resident population of over 80,000 people. They also account for over £0.5Bn Wales's Gross Value Added (1.2% of the Welsh economy).

An image illustrating the National Parks and National Landscapes in Wales is shown in Figure 1.

In 1974, the Local Government Act gave new responsibilities and resources to National Park Authorities, including the role of Local Planning Authorities under delegated powers, as a committee of the local authority. As a result, National Parks took responsibility for maintaining the spatial development framework and for granting consent for development. The Environment Act 1995 strengthened the purpose of National Parks, and sets out two statutory purposes:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks; and
- To promote opportunities for the understanding and enjoyment of the special qualities (of the park) by the public.

It also set out the statutory duty of National Parks to 'foster the economic and social well-being of communities living within the National Park'.

¹ <https://www.npapa.org.uk/national-parks-of-wales.html>



Figure 1 Map of Wales's National Parks and National Landscapes²

Planning Policy Wales (Edition 12) also sets out policy direction for National Parks (and Areas of Outstanding Natural Beauty). This includes requirements around the preparation of Strategic Development Plans and special considerations apply to major development proposals within National Parks, noting that these should not take place in National Parks except in exceptional circumstances³.

In terms of governance, around half of the members of each National Park Authority are appointees from the principal local authorities covered by the park, and the remainder are appointed by the Senedd, with some members representing the community councils and other selected to represent the national interest.

National Park Authorities receive 75% of their funding from the Welsh Government, and 25% from a National Park levy on constituent local authorities (the cost of which is reflected in their overall budget

² <https://www.bbc.co.uk/news/uk-wales-34648193>

³ <https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf>

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settlement from the Welsh Government). They can also generate income through various additional sources such as visitor fees and commercial activities.

As sole local planning authority for the park, each National Park is also required to produce a Local Development Plan and a management plan setting out strategic objectives and policies for managing the National Park.

Fee incomes from planning applications help fund planning services. However, there are concerns that some types of applications that are not fee earning (Conservation Area Consent, Listed Building Consent, Article 4 Direction) could be more likely in a National Park, which could make it more challenging for National Park Authorities in terms of cost recovery when considering ‘major’ planning applications that typically attract larger fees may be less likely in a National Park.

1.3 Purpose of this report

This factual report has been prepared and sets out the key findings of Arup’s work undertaken to identify the potential implications of a National Park Planning Authority on planning services. This forms part of an evidence base that NRW is preparing to help it evaluate the case for the proposed new National Park.

NRW is independent and will make an evidence-based recommendation for the benefit of the people of Wales, accounting for all relevant legislation. The process will reflect the Welsh legislative and policy framework through the application of Sustainable Management of Natural Resources (SMNR) principles with a focus on nature recovery and climate adaptation and mitigation.

The assessment procedure will decide if the evidence demonstrates that the statutory criteria relating to natural beauty and opportunities for open-air recreation are met, and if the area is of sufficient national significance that National Park purposes should apply.

NRW will need to:

- consult with local communities and relevant local authorities
- assess the geographical features in the area
- check the suitability of the area against legal definitions of what a National Park should be
- determine the ideal boundaries of the new park
- make recommendations to Welsh Ministers.

On completion of the assessment procedure, if NRW considers that Designation is desirable for the management of the area for the people of Wales, (both current and future generations), then a Designation Order will be submitted to Welsh Government. Welsh Government will consider this and decide to either confirm, refuse, or vary the Designation Order. If confirmed, a new National Park would come into effect. Welsh Government must make an Establishment Order where a new National Park Authority is to be created. The assessment will take place within the existing Senedd term (2021-2026).

1.4 Approach

A Project Plan was agreed at the outset of this project, which helped Arup discuss and agree with NRW the project scope, timescales, management arrangements, members of a Core Steering Group (members of the NRW Technical Advisory Group), and approach to stakeholder engagement. The project has been carried out to focus on a series of evidence-gathering and analytical tasks, as follows:

1. Context analysis – based on a literature review, to present a summary of the relevant context for this planning services review.

2. Baseline analysis – informed by a data request that has sought to collect and process information from key stakeholders, including:

- a) Existing planning services⁴ (Development Management and Forward Planning) for each potentially affected and relevant / neighbouring Local Planning Authority (LPA) (Gwynedd, Wrexham, Denbighshire, Flintshire, Powys and Eryri), with a data request considering budgets (income), staff numbers and costs associated with different planning services, volumes of planning applications (by type), and governance arrangements.
- b) Development Plan status, considering status of Local Development Plans (LDPs) and future replacement LDP review/preparation, Strategic Development Plan (SDP) and Regional Transport Plan (RTP) preparation timescales.
- c) Displacement effects – involving an initial analysis of any potential displacement effects on areas not within the existing National Landscape).

3. Stakeholder analysis – further to agreeing a Stakeholder Interview Plan, to explore key issues, with:

- a) Targeted 1-2-1 selected stakeholder interviews considering potential impacts on different planning services, best practice and the potential transitional arrangement period.
- b) Analysis of alternative models for the delivery of planning services, considering:
 - A National Park Authority with a full planning service (the current arrangement in Wales), including a case study on Eryri (Snowdonia) National Park.
 - Alternative operational models, including case studies for the South Downs National Park, and the Cotswold National Landscape Conservation Board.

A stakeholder engagement log has been prepared and appended to this report, summarising stakeholder participation (see Appendix A).

To help structure the stakeholder interviews, questions and prompts were used (see Appendix B).

⁴ Not an analysis of comparative performance
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2. Context analysis

A literature review has been undertaken to help understand and highlight relevant information and lessons learnt for the planning services review in the context of a proposed National Park in Wales. Informing this context analysis are the following documents, which have been agreed to be the focus on the literature review with NRW:

- Promoting a Resilient and High Performing Planning Service Consultation Document 2024 (Welsh Government).
- Wales's New National Park Proposal- Public Consultation 2024 (Natural Resources Wales).
- Evaluation of Management Options, Forces for Change NE Wales 2024 (Land Use Consultants on behalf of Natural Resources Wales).
- Delivery of Planning Services in Statutory Designated Landscapes in Wales in 2012 (Land Use Consultants on behalf of the Welsh Government).
- Research into the cost of delivering a Development Management service in Wales 2021 (Arup on behalf of the Welsh Government).

2.1 Promoting a Resilient and High Performing Planning Service Consultation Document 2024 (Welsh Government)

What is this document and why is it relevant to the Planning Services Review?

The consultation document⁵ sought views on improving the resilience and performance of planning services in Wales in connection with the current Programme for Government 2021-2026 and planning reforms in Wales. Views were sought specifically on:

- increasing planning application fees (including proposing a pathway to full cost recovery)
- measuring and monitoring performance by re-invigorating and reintroducing the Performance Framework
- supporting resilience, capacity and capability through skills retention, bursaries and apprenticeships
- improving resilience and resources by Corporate Joint Committees through:
- shared service delivery
- planning skills hubs
- extending the Local Development Plan Review period.

The consultation document outlines the legal basis for planning fees, the proposed changes to existing fee categories, and the introduction of fees for applications where there is currently no charge. It emphasises the importance of a high-performing planning service for the successful delivery of national and local priorities, which needs to be appropriately resourced.

The responses to this consultation are currently being reviewed by the Welsh Government, with details of the outcome to be published in due course.

What are the key points relevant to the Planning Services Review in the context of a proposed National Park in Wales?

The consultation document provides a comprehensive overview of the current challenges faced by planning services in Wales, including significant financial and staffing pressures. It highlights the need for increased resources, better performance monitoring, and enhanced skills and capacity within planning authorities.

The proposed measures in the document include increasing planning fees and re-introducing the Performance Framework. It should be noted that Rebecca Evans AS/MS Cabinet Secretary for Economy, Energy and Planning wrote to LPAs, PEDW and Statutory Consultees on 17 March 2025 to confirm the Welsh Government's plans to address the latter proposal. Rebecca Evans confirmed, *"To evaluate the impact of my current and future proposals aimed at improving the effectiveness, resilience, and capacity of planning services, and to ensure that performance is effectively monitored, the Performance Framework will be reintroduced from 01st April 2025."*

The proposal to increase planning application fees and move towards full cost recovery seeks to help local planning authorities deliver planning services in Wales.

The consultation document also outlines measures to support the resilience, capacity, and capability of planning authorities through skills retention, bursaries, apprenticeships, and shared service delivery.

In particular the consultation document discusses improving local authority resilience and resources through regional coordination via Corporate Joint Committees (where Mid and North Wales CJsCs would be relevant to the proposed National Park Candidate Area), planning skills hubs and extending the Local Development Plan Review period.

⁵ <https://www.gov.wales/sites/default/files/consultations/2024-11/consultation-document-promoting-resilient-high-performing-planning-service.pdf>
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The document underscores the need for planning authorities to be resilient and high performing to manage the complexities of planning services effectively. This is particularly relevant for the proposed National Park, where effective management and planning are crucial for its success. The proposal to increase planning application fees and move towards full cost recovery is considered essential for funding planning activities including those required for the National Park whilst being mindful of the tension or need to avoid adverse impacts on existing Local Planning Authority services. Adequate funding ensures that the planning authorities have the necessary resources to support the Park's development and management.

The re-introduction of the Performance Framework to monitor and improve the performance of planning authorities is vital for ensuring that the National Park is managed efficiently. Regular performance monitoring helps identify areas for improvement and ensures that the Park's goals are met. Supporting the resilience, capacity, and capability of planning authorities through skills retention, bursaries, apprenticeships, and shared service delivery is crucial for building a skilled workforce to manage the National Park. This ensures that the Park has the expertise needed for effective management.

The document highlights the importance of collaboration between various departments and stakeholders to achieve the project's goals. This is relevant for the National Park, where collaboration between planning authorities, local communities, and other stakeholders is essential for its success.

2.2 Wales's New National Park Proposal- Public Consultation 2024 (Natural Resources Wales)

What is this document and why is it relevant to the Planning Services Review?

The consultation⁶ was intended to provide an opportunity for wide participation and inform discussion, with information provided to inform participants including a short summary of all evidence to date found in a Summary of Evidence Report⁷.

Part 1 provided information about National Parks. Part 2 outlined the evidence collated to inform the statutory designation procedure. Part 3 summarised additional work being undertaken to support the procedure.

This document sets out the purpose and duties, governance and funding arrangements of National Parks, and explained the differences to a National Landscape designation. It also presented the geographical extent for further investigation as well as an evaluation of management options, with an assessment to inform the consultation exercise.

The consultation information also outlined the statutory process that must be followed in determining the case for a new National Park, and the specific aspects of this procedure, including the statutory criteria that need to be met, and that consultation and opportunities for adjustments are built into the process. On completion of the assessment procedure, if NRW considers the designation is desirable for the management of the area for the people of Wales, then the next step would be the submission of a Designation Order to Welsh Government with the options to confirm, refuse or vary. If confirmed, a new National Park would come into effect. Welsh Government must make an Establishment Order where a new National Park Authority is to be created.

As part of this Planning Services Review in the context of a proposed National Park in Wales, NRW has shared some relevant consultation responses with Arup to consider, whilst some stakeholders have also sent

⁶ <https://ymgyngori.cyfoethnaturiol.cymru/north-east-gogledd-ddwyrain/wales-national-park-proposal-publicconsultation/#:~:text=The%20public%20consultation%20period%20will,National%20Park%20Proposal%20information%20page.>

⁷ https://ymgyngori.cyfoethnaturiol.cymru/north-east-gogledd-ddwyrain/wales-national-park-proposal-public-consultation/user_uploads/dlprogramme_evidence-summary-final-3.pdf

their responses directly to Arup in connection with the stakeholder engagement exercise as part of its Review.

What are the key points relevant to the Planning Services Review in the context of a proposed National Park in Wales?

The consultation information provides a helpful baseline and context for a potential new National Park. It helps define the Candidate Area to which potential new planning services may operate and sets out the challenges and opportunities in connection with resourcing and managing planning services. The Summary of Evidence Report also outlines key aspects of the proposal, such as the duties, legal purpose, governance arrangements and funding sources for the proposed National Park Authority and provides context for potential impacts on constituent Local Authorities.

In particular, the funding, governance arrangements and duties are likely to have a larger impact on constituent Local Authorities. It sets out that while 75% of funding comes from Welsh Government, the remaining 25% is provided by a levy on constituent local authorities, the cost of which is reflected in their overall budget settlement from the Welsh Government. The proposed National Park Authority would also manage its own planning functions, including the requirement to prepare a new Local Development Plan. The combination of factors will have implications for existing Local Authority funding, resourcing, boundary areas and also impact their existing planning services, including Local Development Plan preparation, and legal frameworks.

A summary of the key themes which emerged from the consultation responses are outlined below.

Impact on Planning Services

Respondents were concerned about the impact on planning services, from both a policy and development management perspective. Local Authorities have sought clarity on potential implications of a new National Park Planning Authority for existing services in existing LPAs.

Given the number of existing LPAs within the boundary of the National Park, some highlighted issues with the delivery of development management services and enforcement and queried how a consistent approach would be taken when applying different LDP policies. Many respondents noted that it was difficult to understand the implications with limited information provided to date on the management and planning authority position associated with the proposals. The impacts on LDPs were considered to be too uncertain, and many authorities were worried that once the designation was in place it would trigger an immediate review of their own LDP with associated costs and delays to be borne by their local authority areas.

Some also highlighted that the creation of a new LPA would potentially undermine recruitment efforts and make recruitment more difficult, given they would be competing with a new employer and there is a limited pool of planners with the relevant skills and experience in Wales.

Developers have highlighted the need for a well-resourced planning service should a National Park be established.

Funding

Several respondents had concerns about the impact of a new National Park on Council finances, given a proportion of funding for National Parks comes from constituent Local Authorities. They held concerns given the current budgetary situation of many authorities and further impact if funds need to contribute to this. Some indicated that given the financial situation of local government, involvement in this work is not a priority as money is more urgently needed elsewhere. There was also the view that the Welsh Government has not provided any assurances around future funding arrangements and this information is vital for a number of Councils confirming their support for the proposal, notwithstanding the First Minister of Wales stated at the Senedd Plenary on 19 November 2024 that “the Welsh Government has made a commitment that funding for any new national park would not be taken from existing designated landscapes”.

Purpose and boundary

Another theme which arose was the uncertainty around the proposed boundary and why some areas were or were not included, and where the boundary of a significant landscape truly lies as many regarded wider areas as possessing the same beauty. Others queried the value of the National Park designations and whether this was the most appropriate mechanism to meet the stated aspirations. Some respondents expressed that the existing National Landscape was already doing an effective job, and that a pragmatic mechanism could be the extension of the existing boundary rather than the creation of a new public body.

Community cohesion

Concern was raised where the proposed boundary falls over part of a community, and if this would result in division between residents inside and outside of the proposed National Park area. It was indicated that a public perception already exists, that a boundary may artificially segregate communities.

Rural communities

Stakeholders highlighted that rural communities need to be considered as part of this proposal, given the view that a new National Park would pose a barrier to flexible management approaches that support local initiatives and growth. There was also concern that a National Park Authority will be located remotely from the local communities they are intended to support.

Displacement effects

Some respondents were concerned about the impact on their Local Authority area where part of the National Park candidate area falls within their jurisdiction. They highlighted that it was likely housing and employment demand would increase dramatically outside of the proposed area, and that there would be the need to update the LDP to capture this pressure.

2.3 Evaluation of Management Options, Forces for Change NE Wales 2024 (Land Use Consultants on behalf of Natural Resources Wales)

What is this document and why is it relevant to the Planning Services Review?

The purpose of this document⁸ was to conduct a review of available management options, to understand whether the designation of a National Park is the best mechanism for managing the forces for change (issues and opportunities) acting upon the Area of Search, building on the earlier Delivery of Planning Services in Statutory Designated Landscapes in Wales 2012 report (Land Use Consultants on behalf of the Welsh Government) (see 2.4 below). The forces for change cover climate change, built development and infrastructure, land management, agriculture and natural environment, people, communities and management of cultural heritage and recreation, tourism and access. An overview of the five management options is listed below:

1. Business as usual: this reflects the continuation of the management of the National Landscape and the management of the rest of the Area of Search as currently.
2. Valleys Regional Park: this partnership was established to help the Welsh Valleys thrive environmentally, socially and economically, taking an enabling role.
3. South Pennines Regional Park: the area was a previous prospective national park and was taken forward as a regional park through a partnership approach.
4. Conservation Board: a management approach for National Landscape currently applied for the Chilterns and Cotswolds National Landscapes (former AONBs).

⁸ https://ymgyngori.cyfoethnaturiol.cymru/north-east-gogledd-ddwyrain/wales-national-park-proposal-public-consultation/user_uploads/lucmanagement-options-report---final-report-sept2024-1.pdf

5. National Park: reflecting the anticipated scope of a future national park, taking into account the Biodiversity Deep Dive and Wellbeing of Future Generations Act.

Each management option was reviewed against the following functions:

- Context, remit and purpose
- Governance and membership • Core Funding, and
- Planning.

An evaluation of the five management options compared them against the following functions:

- Scale of influence
- Statutory or non-statutory basis
- Management planning
- Forward planning and Development management, and
- Funding.

What are the key points relevant to the Planning Services Review in the context of a proposed National Park in Wales?

The evaluation outlines the fact that National Park designations have a statutory basis, which is reflected through national and local planning policy, and a National Park, like a Local Authority, sets out its own planning policy through a LDP. All LDPs seek to foster the economic and social well-being of local communities, alongside the conservation of landscape, wildlife and cultural heritage to deliver sustainable development.

The LDP of a National Park however frames economic, social well-being and local community interests within a plan that gives particular weight to working with, supporting and enhancing (where possible) the landscape, wildlife and cultural heritage of the area. National Park Authorities also have a duty to foster the economic and social well-being of local communities within the National Park, by virtue of the provisions of the National Parks and Access to the Countryside Act 1949. That includes the need to cooperate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the National Park.

Options for the delivery of the development management service within a National Park may vary in terms of decision making, with decisions made either within the National Park Authority, or delegated to the local authority.

The difference between National Landscapes and National Parks in relation to development management is also outlined. National Landscapes do not have development management powers in the UK. National Parks in the UK generally do, although a key exception is the South Downs National Park, where the development management function is partially delegated back to constituent local authorities in some cases (out of choice) and the National Park exercises its powers to effectively call in for applications where it considers it should be the decision maker. Similarly, in the Cairngorms National Park development management decisions are made by the relevant local authorities, and the National Park has call in powers on planning applications of general significance to the National Park.

Reflecting the sustainable management of natural resources (SMNR) principles and the five Ways of Working set out in the Well-being of Future Generations Act, the statutory framework of National Park designation or creation of a new extended National Landscape across the Area of Search was suggested to provide the strongest integrating framework and greatest security.

However, it was acknowledged that national park designation will introduce new pressures and challenges and opportunities for the area but also provide mechanisms to address these (such as the requirement to create a LDP to deliver the National Park Management Plan).

2.4 Delivery of Planning Services in Statutory Designated Landscapes in Wales in 2012 (Land Use Consultants on behalf of the Welsh Government)

What is this document and why is it relevant to the Planning Services Review?

The report⁹ provided a comparative study assessing the effectiveness of planning services delivered in the context of statutory designated landscapes (Areas of Outstanding Natural Beauty – AONBs) and National Parks. It also provided a high-level summary of the statutory purposes and status of both mechanisms as of 2012.

Whilst dated, the report provides still offers useful context to the structure and key differences between National Park Authorities and AONBs (now National Landscapes) including staff roles, the responsibilities each holds, and the resourcing provided to undertake their respective duties.

In summary, the report suggested AONBs have limited staffing and responsibilities, while National Park Authorities undertake their own planning functions and other responsibilities requiring greater levels of resource.

The report focuses on understanding the different planning models across statutory designated landscapes in the UK including descriptions of different models at each level. Comparisons are made between different planning services models in Wales, England and Scotland.

The planning delivery models investigated included the following:

- National Park Authorities with full planning powers (development management and policy): 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.

As part of this work, LUC reviewed all relevant online information and interviewed the relevant National Park Authority, AONB, National Scenic Areas and planning officers to collect qualitative data and evidence around the organisational structures, governance arrangements, process management for Development Plan production and Development Management, as well as decision-making responsibilities.

Barriers to effective planning delivery as identified in the report included limited policy guidance on landscape issues, (negative) perception of planning in AONBs and National Parks, split of responsibilities between NPAs and AONBs and their constituent LPAs, inconsistency in development management, governance, and performance monitoring.

⁹ <https://www.gov.wales/sites/default/files/publications/2018-10/planning-statutory-landscapes.pdf>

The report also presented a comparative analysis of planning services and outcomes in statutory designated landscapes across Wales. An assessment was undertaken on how planning functions are delivered across the statutory designated landscapes of Wales.

As set out above, the report identified perceptions of planning in AONBs and National Parks. In summary the report identified there was a strong perception among local communities and businesses that planning within AONBs and National Parks stands in the way of ensuring the long-term sustainability of local businesses, threatening the economy and communities of these designated landscapes – through an antidevelopment policy or decision-making position. Stakeholders involved believed that decision-making on applications within these areas is too heavily weighted in favour of conservation, with insufficient emphasis on the socio-economic needs of the people who live and work there. This perception was particularly strong in National Parks.

There was a view that the planning system is insufficiently flexible, particularly for small-scale rural developments. This lack of flexibility was seen as a barrier to achieving sustainable development that balances economic, community, and environmental needs. There was a perception that there is poor local community representation on some National Park Authorities too, leading to planning decisions being made by people with no direct association with the Park area. The lack of local representation was seen as a barrier to effective planning delivery.

Stakeholders agreed that there was a lack of enforcement against planning breaches that exacerbated a sense of inconsistency. This was seen to undermine the credibility of the planning system.

The document also emphasised the need for a strong and consistent planning framework, partnership working, and the importance of conserving and enhancing the special landscapes of National Parks and AONBs while ensuring viable communities and local businesses can thrive.

What are the key points relevant to the Planning Services Review in the context of a proposed National Park in Wales?

The report provides a valuable perspective on the perceptions of planning in National Parks and AONBs, suggesting National Park designation could be seen to result in less development and more protection of the landscape and its features.

The report also summarises the different options for governance, funding and resourcing arrangements, as well as opportunities and challenges associated with each option. Each delivery model is supported with significant detail and explanation of key aspects of the arrangement for different local authorities, including key responsibilities and information on relationships with constituent local authorities. The following key findings are relevant to planning services in connection with a proposed new National Park:

- Improved information on landscape and landscape tools: National Policy should support and promote sound landscape planning and the use of landscape character assessments as important evidence to inform development decisions.
- Improved policy framework at the local level: The value of planning to the boundaries of statutory designated landscapes has been identified through this research, to achieve the purposes of designation (as exemplified by National Park Local Plans), but the policy framework is weaker for AONBs. Supplementary Planning Guidance is useful in guiding decisions and forming a sound evidence base.
- Improved perception of planning in statutory designated landscapes: tackle the perception that planning within statutory designated landscapes stands in the way of community and business development. There are a number of focused activities that can help overcome this perception, such as the preparation of sustainable development strategies for individual statutory designated landscapes and the development of collaborative approaches to involve local communities in planning the future of their area.
- Partnership working between planning and the socio-economic functions of local authorities: Due to the split between planning functions within the National Park Authority and the socio-economic functions of

their constituent local authorities, working in partnership and having a mutual understanding and respect between each other is crucial. The same applies for AONBs. This suggests every opportunity for joint working should be explored, linking planning with socio-economic responsibilities, and sharing staff resources to enable specialist staff to be employed.

- Bringing consistency to development management: The study identified general concern about inconsistency in planning determinations, which relates to all LPAs, but especially those that have a high percentage of rural applications (as in National Parks and AONBs) which tend to be unique. A consistent planning framework, specialist advice, and consistent staff training will assist with this, along with a number of other mechanisms.
- Governance: Through stakeholder consultation, it was 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 was noted that there was little consistency in the structure and governance of Joint Advisory Committees of AONBs, and therefore it was suggested that greater consistency should be brought to these committees.
- Performance monitoring: At the time, it was highlighted there was limited national reporting on the performance of planning within the statutory designated landscapes and it was suggested this be addressed to ensure any criticism of planning in National Parks and AONBs are based on fact. A number of monitoring indicators were suggested to assist with this.

2.5 Research into the cost of delivering a Development Management service in Wales 2021 (Arup on behalf of the Welsh Government)

What is this document and why is it relevant to the Planning Services Review?

The report¹⁰ provided a comprehensive analysis of the costs associated with delivering development management services in Wales, which helped to inform the Welsh Government's '*promoting a resilient and high performing planning service*' consultation. The research was commissioned by the Welsh Government in October 2019 and aimed to inform potential improvements to planning fees in Wales. The key objectives of the research included:

- Providing a broad definition of Full Cost Recovery (FCR) in the context of delivering a Development Management Service in Wales.
- Modelling FCR in a range of potential scenarios.
- Engaging with key stakeholders, such as the Planning Officers Society Wales (POSW), in defining FCR and testing model scenarios.

The research involved data collection and analysis to estimate fee income and overall costs across planning departments in Wales. It presented potential changes required to planning fees for LPAs in Wales to achieve full cost recovery. The report also explored what a reformed planning fee schedule could look like if the existing planning fee regulations were simplified.

The document outlined several scenarios for potential planning fee reform:

- **Scenario 0: Business as usual**

Represents the current fee structure for planning applications in Wales, serving as a baseline for understanding the existing situation before exploring potential changes. It includes 56 application categories with specific fixed and variable fees, involving cross-subsidy between different categories, leading to inconsistencies in cost recovery.

¹⁰ https://www.gov.wales/sites/default/files/publications/2021-07/research-into-the-cost-of-delivering-a-development-management-service-in-wales_0.pdf

The scenario highlights that the costs incurred by Development Management services in Wales currently outstrip the fee income received, indicating that the current fee structure does not achieve full cost recovery. Additionally, the existing fee structure is complex, with many caveats and specificities, making the planning process less accessible and efficient.

- **Scenario 1: Cost recovery**

Models the changes required to planning fees for LPAs in Wales to achieve FCR on an application-by-application basis, ending the current cross-subsidy between different application categories.

This scenario highlights the need for significant increases in planning fees across almost all existing fee categories, particularly for minor applications. For example, householder applications would need to increase from a £190 fixed fee to a £475 fee, a 150% increase. The model also considers potential variable fee rates for categories with variable fees within the existing regulations. Proposed maximum fees have been derived by uplifting the analogous Scenario 0 figures by the same percentage change as the fixed or variable fees.

- **Scenario 2: Simplified charging schedule**

Models a simplified fee structure organised under 11 categories, consolidating the existing 56 fee categories. This scenario proposes fee increases required to achieve full cost recovery, with the highest increase required for minor application categories, such as the 'Minor -Land' category (200%) and householder applications (175%). The lowest percentage increase is proposed within the 'Other -Buildings' category at 25%. The simplified fee structure aims to reduce complexity and improve accessibility for planning professionals and the public.

- **Scenario 3: Extremely simplified charging schedule**

Proposes a highly simplified fee structure with 11 categories, aiming to reduce complexity and improve accessibility. The categories include householders, minor (dwellings, land, buildings), major (dwellings, land, buildings), other (buildings, fixed, land), and exemptions. This scenario suggests a uniform fee increase of 50% across all categories, except for the 'other' category, which requires a 125% increase to achieve full cost recovery.

The findings concluded that increases to planning fees are required across almost all existing fee categories to achieve FCR. The report highlighted the need for larger increases in minor application categories, which currently do not recover the costs incurred by LPAs. It also emphasised the importance of simplifying the existing fee schedule to improve accessibility for planning professionals and the general public.

The document concluded with recommendations for the Welsh Government to consider improvements to planning fees in Wales in both the short and longer term. It suggested regular reporting of overall fee income and tracking of resource expenditure to explore potential fee changes further.

What are the key points relevant to the Planning Services Review in the context of a proposed National Park in Wales?

The document outlines the [then] costs associated with delivering development management services in Wales. Whilst the work was undertaken to inform the Welsh Government's Promoting a resilient and high

performing planning service consultation, it remains helpful in providing evidence that is relevant to the potential costs involved in planning services as part of a new National Park.

By providing a comprehensive analysis of the costs and potential improvements to planning fees, this document offers valuable insights that can guide the financial and administrative aspects of creating a new national park in Wales.

The research implies that full cost recovery and performance evaluation will be important for ensuring that the planning services for the proposed National Park are sustainable and this will now be driven by the Welsh Government's recent announcement of the Performance Framework and its emerging response to its consultation on '*promoting a resilient and high performing planning service*' including the approach to planning fees in Wales.

3. Baseline analysis

The purpose of this section is to investigate and summarise the existing baseline for Denbighshire, Flintshire, Powys, Wrexham and Gwynedd¹¹ councils' planning services, in addition to Eryri National Park Authority for comparative purposes. Data has been collected to help inform an understanding of how the proposed New National Park Authority may impact on their planning services, and/or the implications of establishing a new LPA in North Wales.

This section is informed by a data request which was issued to each authority in March 2025, comprising a data sheet and covering letter comprising context to the request with instructions. The analysis presented within this section therefore relies upon the accuracy of third-party data, and the calculation of average figures is dependent on the provided data only notwithstanding data gaps owing to unavailable information, as recorded in Appendix C (Datasheet).

Wider statistical data is available in the public domain including local authority revenue expenditure budgets, capital forecast expenditure by authority and service, and capital forecasts and service level revenue expenditure and financing for planning and National Parks¹¹. There is also published development management quarterly survey data¹² and planning performance data¹³. Arup has not been asked to consider that information as part of the scope of this work. However, it does form part of the wider available evidence base for NRW to consider.

3.1 Existing planning services

3.1.1 Budget and Income (Annual)

Annual budgets allocated for existing local authority development management services within the candidate national park area total around £143,000 (i.e. across the existing authority areas that cover the candidate national park area), acknowledging this information is limited to the data provided by one authority area given others have given zero or null responses.

The comparative figure for the Eryri National Park is around £725,000 (covering development management services across its whole national park area, acknowledging the differences in geographic scale, and considering a fee income of £146,000).

¹¹ <https://www.gov.wales/sites/default/files/statistics-and-research/2024-06/local-authority-revenue-budget-and-capital-forecast-april-2024-march-2025-917.pdf>

¹² <https://www.gov.wales/development-management-quarterly-surveys>

¹³ <https://www.gov.wales/planning-services-performance>
Natural Resources Wales

For forward planning (policy) work, annual budgets range up to around £410,000, with an average of around £302,000 based on the data provided. This compares closely with the Eryri comparator figure of £283,000.

The highest local authority income received from development application fees is around £334,000 per annum, while the lowest was close to zero recognising one authority's land within the candidate area accounts for only approximately 0.6% of all applications received. The average is around £122,000 and the total is around £487,000. The comparative for Eryri National Park is around £146,000.

3.1.2 Staff Numbers and Costs (own and third party)

The average number of full-time equivalent staff (FTE) employed for development management services pro-rata to the Candidate National Park Area is around 12.5, ranging from as little as 0.5 to as high as 23.5 FTE.

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While Gwynedd Council was included in the data request, due to the limited number of development applications within the Candidate Area (less than 1%) they have only provided a response to clarify that data.

The comparative figure for the Eryri National Park is around 11.5 FTE, which is similar to the average FTE for existing candidate area authorities (12.5).

When considering total planning applications in the candidate area (see 3.1.3) per FTE staff employed for development management services, this shows on average 130 applications per FTE. This compares to 44 applications per FTE in Eryri.

The average number of full-time equivalent staff (FTE) employed for forward planning policy work pro-rata is around 4.5, ranging from 3 to 6 FTE. The comparative figure for the Eryri National Park is around 3.6 FTE.

The average number of FTE staff positions currently vacant and advertised for planning services is 1, which is comparable to Eryri National Park (also currently recruiting for 1 planning post).

The average estimated own staff costs involved in development management services pro-rata to the Candidate National Park Area is around £380,000. The highest cost is around £678,000, and the lowest is around £15,000. The comparative figure for the Eryri National Park is £668,000.

The average own staff costs as a statutory consultee on Nationally Significant Infrastructure Projects (NSIPs) and Developments of National Significance (DNS) pro-rata to the Candidate National Park Area is around £15,000, with costs ranging from as little as zero to approximately £39,000.

The estimated third party and consultant costs related to providing development management services in the Candidate National Park Area is around £20,000. The costs vary from as little as zero to around £60,000. The comparative figure for the Eryri National Park is £50,000.

The estimated third party and consultant costs related to providing forward planning services in the Candidate National Park Area is around £194,000, with costs varying from as little as zero to £570,000. The comparative figure for the Eryri National Park is £6,500.

The estimated own staff costs contributing to Corporate Joint Committees (CJCs) in the development of Regional Transport Plans (RTPs) and Strategic Development Plans (SDPs) were either unknown or at zero costs, with the exception of Eryri National Park with average staff costs of £13,500 as a comparator.

The average salary for Head of Planning (or similar) roles across all authorities is approximately £73,000. Whilst Eryri National Park does not hold a Head of Planning post, there are comparator roles in heads of planning services with an average salary around £46,000 FTE.

The average salary for a principal planner / team leader role in the Candidate National Park Area is £46,000, with salaries ranging from approximately £43,500 to £49,000. The average salary for a senior planner is

£41,500, ranging from approximately £38,000 to £45,000, and the average salary for a planner is £37,000, ranging from approximately £32,000 to £40,500. The average salary for a technician / administrator is approximately £27,000, ranging from approximately £26,000 to £28,000. The comparative figures for Eryri National Park are approximately £41,000 (principal planner / team leader), £35,000 (planner) and £26,000 (technician / administrator) respectively.

3.1.3 Development Management services – Planning applications

This section summarises the number of planning applications made over the last five-year period within the existing National Landscape boundary compared to the Candidate National Park Area.

It is important to note that some of the Local Authorities within the Candidate National Park Area do not fall within the existing National Landscape boundary (Gwynedd and Powys), and the data in this section is based on relevant information provided by the relevant authorities.

Planning applications over the last 5-year period within the existing National Landscape boundary total nearly 800, spanning different types, which equates to around 160 each year.

Planning applications over the last 5-year period within the additional areas included within the Candidate National Park Area total more than 1,900, again spanning different types, equating to around 385 each year.

The comparative figure for Eryri National Park is approximately 400 to 500 planning applications each year, being mostly minor planning application types.

There have been no NSIP or DNS applications within the local authority areas within both the existing National Landscape boundary and the Candidate National Park Area¹⁴.

Within the existing National Landscape boundary, there have been on average 20 major planning applications per authority area, ranging from 0 applications to 58 applications across the relevant authority areas.

Within the Candidate National Park Area, there have been on average 7 major planning applications per authority area, ranging from 0 applications to 19 applications across the relevant authority areas.

Within the existing National Landscape boundary, there has been an average of 203 minor applications per authority area, ranging from 115 applications to 419 applications across the relevant authority areas.

Within the Candidate National Park Area, there has been an average of 327 minor applications per authority area, ranging from 0 to 595 applications across the relevant authority areas.

Within the existing National Landscape boundary, there has been an average of 39 ‘other’ applications, whereas the Candidate National Park Area has had an average of 148 ‘other’ applications.

3.1.4 Comparison of statistics between Welsh Planning Authorities and National Park Authorities

NRW has undertaken separate research that explores the additional conditions designated landscapes place upon permitted development rights, in relation to householder, agricultural, forestry and industrial developments, in order to conserve and enhance the quality of these nationally important landscapes. The same research also investigates the performance of the existing National Park Authorities in Wales,

¹⁴ At the time of writing, GALILEO empower is developing proposals for Mynydd Mawr Energy Park on land situated between the Ceiriog and Tanat valleys in north eastern Powys and southern Wrexham, adjacent to the Shropshire border and approximately 8km west of Oswestry. The proposals include up to 21 wind turbines with a maximum height to blade tip of 230m. Solar photovoltaic panels and battery energy storage system (BESS) technology are also being considered at the Energy Park, subject to the completion of further technical studies. As Mynydd Mawr Energy Park will have a capacity between 10 and 350MW it is classed as a Development of National Significance (DNS) under the Planning (Wales) Act 2015. The planning application will be made to Planning and Environment Decisions Wales (PEDW). PEDW will examine the application and make a recommendation to Welsh Ministers, who will then take the final decision. Although Powys County Council and Wrexham County Borough Council will not determine the planning application, they are key statutory consultees and will prepare a Local Impact Report.

compared to Welsh Planning Authorities, in terms of planning application approval rates and planning application determination timescales.

In summary, analysis of the data shows between 2016 and 2022, there was a negligible difference in the average performance of the National Park Authorities in Wales, compared with Planning Authorities in Wales, in relation to the average planning application approval rate, and the average number of days taken to determine planning applications, which can be summarised below:

- Data explored from 2016 to 2022 highlights National Park Authorities have a slightly higher average approval rate during this period (91.4%), compared with the Welsh average during this period (90.1%).
- Data explored from 2016 to 2022 highlights National Park Authorities took on average 88 days to determine planning applications during this period, compared with the Welsh average during this period of 87 days.

The data does highlight National Park Authorities were, on average, determining less (5.2%) planning applications on time during the period 2016-2022, however this could be as a result of numerous factors, of which it is not clear from the data. In any case, the average number of days taken to determine application is a reliable indicator of actual performance and shows a negligible difference between National Park Authorities in Wales, compared with Planning Authorities in Wales.

3.1.5 Governance and operation

In Wales, the delegation of decision-making for planning applications was primarily governed by the Town and Country Planning Act 1990 and the Local Government Act 1972 until the Planning (Wales) Act 2015 which updated or replaced provisions. LPAs can delegate the determination of planning applications to planning officers under a Scheme of Delegation. This scheme specifies which applications can be decided by officers and which need to go to a planning committee. Typically, less controversial applications are handled by officers, while more significant or contentious applications are decided by the planning committee. The Welsh Ministers have the power to call in planning applications for their own determination.

Each Local Authority has provided information on their governance and operation of their decision-making procedures. Most have a scheme for delegated decision making, with a different level of delegation at each authority.

As a helpful comparator for a National Park in Wales, Eryri National Park Authority has indicated that up to 90% of their decisions are delegated, with the remainder of decisions made at planning committee (made up of 12no. Councillors and 6no. Government Appointees). This is likely because of the high proportion of minor planning applications received and considered, as is considered generally expected or typical in a National Park context. Delegations differ between functions, with different arrangements for development management and forward planning activities.

Wrexham County Borough Council noted that there is an AONB management planning group who are consulted on applications they consider to be relevant (the existing AONB is consulted on certain relevant applications).

Some authorities provided further information on the governance arrangements for their replacement LDP process. Flintshire County Council use a cross-party 'Planning Strategy Group' (PSG) to oversee the progression of their replacement LDP, with key decisions being taken by Cabinet / Council. Wrexham County Borough Council uses a similar approach for key LDP decisions. Powys County Council's replacement LDP preparation process is governed by a Member-Officer LDP Working Group, which meets on a 6-to-8-week basis to examine progress and sign off documents.

3.2 Development Plan status

Local Planning Authorities have expressed concerns about the potential implication of a new National Park on their existing and replacement LDPs. The relevant local planning position for the candidate area is set out below, and to help understand the approaches of the relevant Local Planning Authorities to the existing National Landscape boundary the relevant policies have been identified within the relevant adopted and emerging LDP documents.

3.2.1 Adopted LDPs

- Anglesey and Gwynedd Joint LDP (2011-2026), adopted July 2017
- Denbighshire County Council LDP (2006-2021), adopted June 2013
- Flintshire County Council LDP (2015-2030), adopted January 2023
- Powys County Council LDP (2011 – 2026), adopted April 2018

At the time of drafting this report, the Supreme Court has rejected the Welsh Government’s appeal against the Court of Appeal’s decision in December 2024 that Wrexham councillors did not have to adopt a LDP. This means Wrexham Council does not have a local plan in place, and the Council is currently liaising with Welsh Government to ensure it is meeting its statutory planning obligations without a formally adopted LDP.

3.2.2 Emerging and replacement LDPs

- Gwynedd New LDP (2024-2039). A call for sites was held in 2024 and a Preferred Strategy consultation was scheduled for April 2025, but this is understood to be delayed.
- Denbighshire Replacement LDP (2018-2033). The Preferred Strategy was open for public consultation in 2019 and approved by Council in May 2023. The Deposit Plan is currently being developed and is anticipated to be ready in 2026.
- Powys Replacement LDP (2022 – 2037). The Preferred Strategy was open for public consultation between August and October 2024. Consultation responses are currently being analysed to inform the Deposit Plan, which is anticipated in late Autumn 2025. The Council is currently aiming to adopt the Replacement LDP by 2027.
- Flintshire County Council – Adopted LDP in 2023 and not yet reviewed.
- Wrexham County Council – LDP currently subject to ongoing review, as described above.

3.2.3 Existing policies referring to the Candidate National Park area

As the Candidate National Park area contains the existing Clwydian Range and Dee Valley National Landscape area, the LPAs which contain the National Landscape have a number of relevant policies pertaining to this. These are listed below:

In the Denbighshire County Council adopted LDP (2006 – 2021), the following policies are relevant:

- Policy VOE 2: Area of Outstanding Natural Beauty and Area of Outstanding Beauty states that development within or affecting the AONB that would cause unacceptable harm to the character and appearance of the landscape and the reasons for designation will not be permitted.
- Policy PSE 5: Rural Economy states that employment proposals within the AONB must seek to enhance the landscape, and any detrimental proposals will be refused.

In the draft Preferred Strategy (May 2019), one of the key policies is Nature & Built Environment, and similarly protects the natural environment from the adverse effects of development, adding that development must preserve and, where possible, enhance, the natural environment.

The Flintshire County Council LDP (2015-2030) references the National Landscape in a number of policies, as follows:

- Policy STR10: Tourism, Culture and Leisure supports development that promotes accessibility to the AONB.
- Policy STR13: Natural and Built Environment, Green Networks and Infrastructure states that development should conserve, protect and enhance the quality and diversity of the AONB.
- Policy EN5: Area of Outstanding Natural Beauty only permits development in the AONB where it conserves or enhances the natural beauty of the designated area and its setting, with cumulative impacts taken into account. Development must not have adverse impacts, must contribute to the social, economic and cultural well-being of the local community, must be of a compatible scale, form, density and use, and must be of a high design standard and use appropriate materials.
- Policy EN18: Pollution and Nuisance states that external lighting in or near to the AONB should be considered as part of an overall landscaping scheme and kept to a minimum to avoid light pollution.

The Wrexham County Borough Council LDP (2013-2028) [notwithstanding its current status] contains the following relevant policy:

- Policy NE4: Area of Outstanding Natural Beauty only permits development where it conserves or enhances the natural beauty of the area and its setting. Development must not have adverse impacts, must contribute to the social, economic and cultural well-being of the local community, must be of a compatible scale, form, density and use, and must be of a high design standard and use appropriate materials.

All three of the Councils also recognise that mineral extraction has previously occurred within the National Landscape and have policies steering this type of development away from this area. Denbighshire County Council, Flintshire County Council and Wrexham County Borough Council also adopted the Clwydian Range and Dee Valley AONB Supplementary Planning Guidance (SPG) Note (June 2018). The SPG sets out the development and design considerations for development within the AONB and is a material consideration within the planning process.

While the existing National Landscape does not fall within the boundaries of Gwynedd Council or Powys County Council, there are relevant designations within the Candidate National Park area that are of relevance. Within the Anglesey and Gwynedd Joint LDP (2011-2026), the following policies refer to a Special Landscape Area (SLA) which falls in the south-west of the Candidate National Park area:

- Policy TWR3: Static caravan and chalet sites and permanent alternative camping accommodation states that no new proposals for these accommodation types within the SLA will be allowed, although there are exceptional circumstances where the relocation of these sites may be allowed. Proposals to improve these sites within the SLA may be permitted.
- Policy AMG2: Special Landscape Areas states that consideration to the scale and nature of development proposals within the SLA will be given to ensure there is no significant adverse detrimental impact on the landscape. The development should maintain, enhance or restore the SLA, and a Landscape and Visual Impact Assessment may be required. If development is necessary but could give rise to significant adverse impacts, appropriate mitigation and compensation is required.

The Powys County Council LDP (2011 – 2026) has a number of relevant designations within the Candidate National Park area, which are covered by the following policies:

- Strategic Policy SP6: Distribution of Growth across the Settlement Hierarchy refers to a number of small villages which are within the proposed National Park and states that no more than 10% of the Plan's housing growth will fall within these.

- Strategic Policy SP7: Safeguarding of Strategic Resources and Assets states that development must not have an unacceptable adverse impact on strategic resources and assets, of which the following fall within the proposed National Park area:
 - Registered Historic Landscape
 - Special Area Conservation/Special Protection Area
 - Site of Special Scientific Interest
 - National Nature Reserve
 - Minerals safeguarding areas
 - Glyndwr's Way National Trail
 - Historic Park and Garden Boundary - Historic Park and Garden Kitchen Garden
 - Scheduled Ancient Monument.
- Policy DM2: The Natural Environment states that development should protect, positively manage and enhance biodiversity and geodiversity interests within site designations, and development will only be permitted if it does not unacceptably adversely impact the designations. The following designations are relevant in the proposed National Park area:
 - Special Area Conservation/Special Protection Area
 - Site of Special Scientific Interest
 - National Nature Reserve.
- Policy DM4: Landscape requires development to give regard to Registered Historic Landscapes, adjacent protected landscapes (National Parks and Areas of Outstanding Natural Beauty) and the visual amenity enjoyed by users of both Powys landscapes and adjoining areas.
- Policy DM8: Minerals Safeguarding only permits non-minerals development within minerals safeguarding areas (of which there are many within the proposed National Park area) if the resource is not of potential future value, the development is temporary, the mineral can be extracted prior to development, extraction would be unacceptable, there is an overriding public interest for the development, or the development is minor or within a curtilage.
- Policy RE1: Renewable Energy is relevant as a Local Search Area for solar is identified within the proposed National Park area, and this policy states that solar or other low carbon or renewable energy development is acceptable in this site.
- The small villages within the proposed National Park area include various housing allocations and conservations areas which are also included within the LDP.

Within the Powys Replacement LDP 2022-2037 the most relevant policies are:

- Strategic Policy SP10: which states that development proposals for sustainable forms of tourism will be supported where they have no unacceptable adverse impacts on the Powys landscape.
- Strategic Policy SP19: which refers to the need for development proposals to protect and enhance the natural environment and that they will not be permitted where they will have an unacceptable adverse impact upon the character and quality of the Powys landscape.
- Strategic Policy SP22: regarding protecting strategic resources, which includes landscapes and landscape character together with designated landscapes within or adjoining the Plan area.

- Strategic Policy SP25: relating to renewable and low carbon energy generation, setting out that development proposals will be encouraged in appropriate locations where it can be demonstrated that there will be no unacceptable adverse impacts on the surrounding landscape (including designated landscapes).

3.2.4 Eryri Planning Policy

For comparative purposes it is helpful to consider the Eryri planning policy position.

The Eryri LDP sets standards and policies for development within Eryri National Park. The Snowdonia National Park Authority refer to the LDP to guide their planning decisions.

The Eryri LDP Plan lists factors to consider when evaluating planning applications and granting planning permissions. The factors are based on the qualities that need to be protected and enhanced within the National Park. These include:

- The natural beauty of the National Park
- The National Park's communities and culture
- The National Park's wildlife
- The National Park's heritage and history.

Alongside the LDP are Supplementary Planning Guidance documents. Those documents go into further detail about the policies contained in the LDP, including sustainable design, light pollution, the Welsh language, affordable housing, and visitor accommodation.

Snowdonia National Park Authority was the first local planning authority in Wales to undertake the short form review of their LDP and the first in Wales to adopt a second iteration of their LDP. This is considered further in its case study found later in this report (see 4.9.1).

3.2.5 Strategic Development Plans

Corporate Joint Committees (CJCs) are responsible for developing Strategic Development Plans (SDPs). As long-term plans (with a minimum range of 25 years), it is intended that SDPs will be developed over a number of years and the North, Mid, South West and South East Wales CJCs aim to have their SDPs adopted by or around 2031. Most CJCs are currently working towards their Delivery Agreements, which contain a Community Involvement Scheme (CIS), setting out how and when stakeholders and the community can become involved in the plan-making process. Delivery Agreements also include a comprehensive timetable for preparing the SDP, setting out clear timelines and milestones for various stages of the process.

A Delivery Agreement for the North Wales SDP is currently in preparation and is due to be consulted upon at the beginning of May 2025. To date, no draft Delivery Agreement for the Mid Wales SDP has been finalised for submission to Welsh Government. Once the Delivery Agreement is approved by Welsh Government, it is anticipated it would take around 5 years to prepare an SDP.

3.2.6 Local Development Plans 'Lite'

The Welsh Government is directing Local Planning Authorities to progress Local Development Plan 'Lites' (LDPLs), which will be prepared following adoption of an SDP. LDPLs will be shorter and more focussed in nature, with the scale and location of growth already being set in the adopted SDP for each area. These will be subject to their own Delivery Agreement, and it is anticipated it would take around 2 years to prepare an LDP-lite following adoption of an SDP. Because LDPLs will build on an already adopted SDP and avoid duplicating strategic content, they are expected to take significantly less time to prepare than LDPs do now.

3.2.7 Regional Transport Plans

CJCs are also responsible for developing Regional Transport Plans (RTPs). The North, Mid, South West and South East Wales CJCs issued their draft RTPs for public consultation in early 2025, with consultations closing between April and May 2025.

After considering consultation feedback, CJCs need to submit their proposed RTPs to the Welsh Government in the summer for approval, anticipated to be in or around September 2025. RTPs require approval from the Welsh Government and Welsh ministers have the power to accept or refuse the plans. If refused, a CJC must submit another plan within a specific timeframe. Once approved, a plan has immediate effect. Once adopted, the RTP will be reviewed every 5 years.

4. Stakeholder analysis

4.1 Stakeholder interview results

As part of this review, engagement has been undertaken to help understand the potential planning service implications of a new National Park on a wide range of stakeholders, including local authorities, CJCs, Welsh Government, and organisations with an interest in planning and/or development in the region.

1-2-1 stakeholder interviews focused primarily on different perspectives around planning services, as well as lessons learnt from other protected landscapes, however in some cases stakeholders raised broader matters with an interface with planning which provided valuable insights. This supplements and complements broader public consultation and stakeholder engagement undertaken by NRW in connection with its new National Park proposal (see 2.2) and separate economic impact review, where wider matters about democracy, accountability, public participation, economic and tourism effects have been identified.

The feedback received in response to this planning services review has been considered with key themes identified, which are summarised below.

Case study interviews have separately informed an analysis of alternative models for the delivery of planning services (see 4.9).

A stakeholder engagement log has been prepared and is appended to this report (see Appendix A), summarising stakeholder participation.

4.2 Funding and costs

Many participants highlight the challenging economic climate for local authorities and businesses and question where long-term funding would come from for any new National Park and what services may suffer within existing local authorities as a result of a new designation, assuming there would be funding reassignment by the Welsh Government to any new National Park Authority, or if there was any levy on existing local authorities to fund it.

Some participants are concerned about a potential loss of fee income in connection with applications made within the Candidate National Park Area, particularly for those who receive a significant income stream from such applications. Some consider that extracting work and staff from existing local planning services could risk their ongoing viability, whilst there are also large questions about whether a new National Park Planning Authority would be viable in terms of balancing its planning applications income and budgets for planning services (development management and forward planning).

Some participants highlight the need for any new National Park Planning Authority to contribute to the production of the emerging SDP as well as fund its own new LDP (or LDP Lite subject to the timing). Many participants stress the significant cost of developing a new LDP, which would need to be a key initial task for any new National Park Planning Authority.

Some participants express apprehensions around the long-term funding for a new National Park Planning Authority, indicating past experience showed funding would reduce over time and the effectiveness of the National Park Authority could be reduced as a consequence.

Others consider National Park status could help secure future funding for important environmental and community projects in connection with protecting and enhancing the landscape. Some consider National Park status would help attract resources into the area from increased tourism and political profile, which could be invested in protecting and enhancing the landscape.

Some express an opportunity cost concern, with some participants suggesting now is not an appropriate time to create an additional LPA, given funding challenges and Local Authority priorities being elsewhere (focused on core service delivery).

In principle, whilst some participants support the creation of a new and dedicated planning service as part of a new National Park, their support is subject to the appropriate funding on a long-term basis, functional systems and the assurance that other National Parks in Wales would continue to be supported with no reduced funding as a consequence of a new National Park¹⁵.

4.3 Resourcing and skills

Many participants highlight that there is a deficit of planners across Welsh local authorities generally, particularly planners that are suitably experienced and with strong Welsh language skills. Many recognise existing staffing issues faced by local authorities, with long lasting vacancies and efforts to make staff savings, which could be exacerbated by creating a new National Park Authority.

Some participants highlight challenges of resource disparity among local authorities, and the consequences of poorly resourced planning authorities, suggesting delays in processing and determining applications, and lack of local expertise.

Many participants are concerned that the creation of a new planning authority in Wales would impact on the existing resource challenges and result in spreading the existing pool of planners thinner, exacerbating existing resourcing issues. Generally, there is a feeling that a new National Park Authority would be very likely to redistribute and attract staff from existing local authorities.

There is also recognition of the broader need for new government structures, including local members, councillors, and committee members as well as officers and administrative staff.

With regard to specialist services required to support a new National Park, an existing shortage of ecologists, tree officers, landscape experts and built heritage officers is highlighted, whilst also suggesting an additional need for heritage and conservation support in connection with protecting and enhancing the landscape. Some suggest combining roles, such as conservation and urban design, could be an effective way to utilise existing expertise while maintaining high standards. There is also an acknowledgement that there may be a need for additional emphasis on planning enforcement in a National Park, which could require additional resourcing compared to the existing situation (a National Park policy regime might lead to more unauthorised development and increased demands on enforcement teams).

There is a general acceptance that planners in North Wales should demonstrate Welsh language skills given the context of the Welsh speaking population in that region (including the candidate area). This is considered to reduce the availability of resource within an already limited pool.

Some consider that because National Parks can charge fees for planning services, which can be a significant source of income, the designation can help attract and retain skilled and dedicated resources. However, National Landscapes rely more on developers' willingness to pay for consultancy services, which is less reliable, and often leads to a less well-resourced team.

¹⁵ The Welsh Government has confirmed this would not be the case.
Natural Resources Wales

Some participants indicate that a shared approach to planning services may be appropriate and allow planners across constituent local authorities to be upskilled and undertake a new area of work, providing them with variety and an opportunity to learn and further develop. Some cited the shared service for minerals and waste planning in Wales as a good example of best practice, and suggested this could be extended to landscape and other specialist roles. Some suggest any new National Park could draw on shared services from existing county councils for functions like highways, housing, and ecology, ensuring consistency and efficiency.

Others expressed concerns that sharing resources could result in additional workload and pressure on planners within constituent local authorities if the existing resourcing constraints were not addressed first, and should not be asked to support a new local planning authority in addition to existing responsibilities. There is also concern that a shared planning service would be less feasible in the rural landscape (such as the requirement to spend a full day travelling to undertake a site visit) with increased costs as a result.

Some consider the potential role of the CJsCs should be discussed, in terms of coordinating regional planning services and specialist roles, whilst acknowledging the challenges of centralising any resources which are often associated with concerns over local resource protection and prioritisation of local tasks. CJsCs could help establish communities of practice around specialist services to provide resilience and drive innovation. This could help reduce siloed working and improve public services generally.

A suggestion has been made that CJsCs could also offer an alternative authority to manage National Park functions.

Many local authorities indicate that they rely on consultant support for their planning services or particular specialist roles when there is a demand, and to further rely on external resources is not a sustainable model given the costs involved. There are concerns that by putting greater pressure on existing resources, some authorities will inevitably need to rely more on bringing in outside help through use of consultants.

Some participants indicate that regardless of the model or approach taken to protect a landscape, the appropriate resourcing and skilled workforce involved in decision making and implementation of planning policies is most important.

Some participants recognise the potential political implications of National Park status and the need for a well-trained planning committee and local members to help ensure development is managed appropriately in line with national and local policies (acknowledging tensions may be experienced in any transitional period for policy replacement). Similarly, improving the quality of responses from community councils through training is considered important to help enhance their contributions to planning decisions, which would be even more important in a National Park context.

Many recognise the general need in Wales to make planning more attractive as a career, including opportunities for bursaries for planning students, apprenticeships and the long-term planning needed to develop a future pipeline of planners for local authorities.

4.4 Impact on existing or planned forward planning activities

Some participants consider a new National Park with plan-making powers would help address perceived inconsistencies in policy and decision-making across the existing National Landscape, and that a LDP for the National Park would provide a consistent framework for decision-making.

Most participants from existing local authorities are particularly concerned about the potential impact of a new National Park Planning Authority on replacement LDP work that is or may be ongoing at the time of designation, and the implications this could have in terms of additional work and associated costs¹⁶.

¹⁶ Existing local authorities have not been asked to provide cost estimates of the additional work that could be involved should a new National Park be designated, given no decisions have been made about the candidate national park area or the model for delivering planning services.

Participants note that if the boundary of existing local authorities were to change due to the creation of a new National Park, that this would likely require a review of their adopted or emerging replacement LDP because of the legal requirement under the Planning and Compulsory Purchase Act 2004 (Section 61), to keep under review the matters which may be expected to affect the development of their area or the planning of its development.

Given the current LDP process and timeframes for each authority, with most underway with their replacement LDP, there are concerns that the new National Park as proposed may result in the need to withdraw replacement LDPs and restart the entire replacement plan preparation process by existing local authorities. This would impact on governance arrangements and delivery agreements for some local authorities. Some authorities also noted that due to this uncertainty, they are hesitant to undertake work now, perceiving it as potentially ‘abortive’ and are waiting for a decision on designation to be made.

Generally, there is less of a concern about interfaces with the emerging SDPs owing to their longer-term preparation over the next 5 years, with participants considering the SDPs will already need to take into account the protected landscapes, and may need to consider a scenario where a new National Park is introduced. The SDPs might be able to make a positive contribution to higher-level strategic policy about environmental protection within sensitive areas like National Parks and National Landscapes.

It is foreseen that in any event of a new National Park Planning Authority, they would be co-opted to the relevant planning (or other) subcommittee of the CJsCs, as a key stakeholder for planning purposes.

Some participants also noted there may need to be updates to Future Wales, the National Plan 2040, owing to potential tensions with existing policies and a new National Park, as well as the need to consider issues such as greenbelt and other allocations that may affect the candidate area.

Some consider the draft Regional Transport Plans for North and Mid Wales are unlikely to require material changes as a result of any new National Park, and in particular the draft North Wales Regional Transport Plan could help positively manage sustainable access to protected landscapes in its regionally coordinated policies.

Some participants suggest whether a transitional arrangement and supporting legislation or guidance could avoid or reduce such concerns, such as a phased approach to creating a new planning authority, new National Park policies, and any relevant responsibilities.

Some respondents suggest the use of Article 4 directions in controlling certain developments within the National Landscape, such as caravan and camping activities, could continue to be effective and be expanded further.

4.5 Transitional arrangements

As indicated above, transitional arrangements are a concern, as well as a potential necessity to help address wider concerns.

It is suggested that there is a need for clear transitional arrangements and guidance for authorities and officers during any transition period, primarily relating to policy gaps in existing plan coverage of the candidate area, and how to undertake development management services during any transitional period.

It is considered there needs to be clarity on planning policies within existing local authorities and any new National Park as part of a transitional period, subject to any selected model of planning services. There is a concern that inconsistencies would be created between existing LDPs and any new National Park’s purpose and aims, until the National Park Authority has its own LDP in place. Some cite the South Downs National Park as a potential example of good practice or where lessons can be learned, in terms of its phased approach to plan-making and replacing local policies (see 4.9.2).

There are also concerns about potential issues with enforcement services and the need for consistency unless or until any new National Park Authority has its own LDP in place, given it may be enforcing against existing local policies that are not entirely aligned to the National Park's purpose and aims.

Some participants express a preference for any LDPs being worked on to be in place before any potential disruption and challenge is caused by any National Park designation.

Some suggest the timing of any new National Park designation and mobilisation could be positive in terms of the potential for SDPs for North and Mid Wales to be in place, and that an LDP Lite (post SDP adoption) would be advantageous for resourcing and policy coverage during and beyond any transition period.

In terms of development management services, some participants express the need for a clear and defined cut-off point for planning applications to be made in any recognised local planning authority area (subject to the selected model of planning services) to help manage the potential impact on existing planning services.

Some participants explain how it could be confusing for the public and stakeholders to understand the policy and development management functions and responsibilities without clearly defined arrangements, including those in any transitional period.

Many stakeholders seek clarity on the impact on existing policies should a new National Park be designated, for example the National Park would affect the implementation of renewable energy policies and preassessed areas.

Some suggested during any transition period (and/or beyond), existing landscape teams involved in producing management plans and facilitating grant funding could be utilised and consulted for their expertise.

4.6 Digital systems

Some participants suggest any a new planning service will need to consider new systems and how they interface with existing local authority systems, subject to the delivery model of any new National Park planning services. For example, in an arrangement where planning applications are considered by existing LPAs, they may be required to be processed via a National Park system and digital portal rather than through the existing local authority system for applications made in the National Park area.

More generally, standardising technology systems across all local and National Park authorities is suggested as a way to improve the interfaces between them and make it easier for the public and stakeholders to engage in planning services. This includes suggestions for digital databases for planning applications, and a standard development management checklist to make it easier for those seeking development within a National Park area to comply with requirements before submitting an application.

4.7 Displacement effects

A range of potential displacement effects have been raised by stakeholders as areas of concern, focusing on different types of development that could be discouraged or reduced within the candidate area by virtue of National Park status beyond the current National Landscape designation.

There is concern that housing development may be displaced, as well as increased housing prices as a result of the designation given the restrictions it would potentially place on housing development. Some consider this could adversely impact the viability of affordable housing in the candidate area. Some are concerned about the impact of changing the boundary of each of the existing local authorities and housing targets, given some may have included areas within the boundary of any new National Park, and there is uncertainty about what a new National Park designation would mean for these figures. The move towards a Strategic Development Plan to set housing targets is seen as a potential resolution to this concern, but the principle remains about a perceived need for areas outside a National Park to supply housing that may otherwise have been allocated or developed in the existing National Landscape.

There is a concern about the future ability to develop sites for renewable energy generation such as onshore wind and solar. Many recognise the tension between zero carbon aspirations and landscape protection. If

development is restricted in the candidate area, then there are broader concerns about how available Wales is to such development given the scale of protected landscapes across the Welsh regions. It is suggested that a new National Park designation would further complicate the existing policy requirements, and conflict with requirements to increase renewable energy production and transition to lower carbon sources in line with Welsh Government policy and broader commitments. Some raised concerns about objections to projects close to pre-assessed areas and the additional pressure neighbouring authorities may need to respond to. Some suggest England takes a more developer-led approach to renewables in protected landscapes, unlike Wales and Scotland, which have more rigorous protections against onshore wind development in these areas.

Mineral extraction activities are also a source of concern, in that National Park designation would be considered to result in current levels of extraction reducing to a stop and no new sites coming forward in the candidate area. As a result, there are concerns that the raw materials required for new development including the strategic projects across Wales and Northwest England would have to be sourced from other sites with associated increased transportation requirements and associated emissions as well as costs for developers.

Participants highlight potential impacts on farming and rural diversification, given the perception and experience of National Parks placing further restrictions on farming practices¹⁷. There is a concern that the designation would hamper farmers' efforts to diversify and future-proof their businesses as a result, including but not limited to reduced planning approvals and funding. Economic pressures, such as the high cost of land and the need for larger-scale farming, are considered important in planning decisions to avoid displacing smaller farms.

Some participants highlight concerns regarding the indirect impacts of a new National Park on funding for other services in local communities and the impact this could have on Welsh language schools and other community resources. Some are concerned this would result in local young people moving out of the area to find work and study, as more traditional economies may not be able to operate within a National Park (although it was noted that increased tourism may provide additional opportunities).

Some participants highlight a misperception that National Parks are a barrier to development and emphasise the importance of managing development effectively to protect the landscape.

It considered that local plans of neighbouring authorities and the decision making of neighbouring local planning authorities, is or will be critical to managing any potential displacement effects and associated additional demand on land outside the National Park boundary. There are concerns that the landscape of surrounding areas could be adversely impacted by intensified development by virtue of displacement effects.

4.8 Purpose, perceptions and wider impact of a New National Park designation

Some participants raise concerns about a new National Park Planning Authority being in conflict with the long-term policy to encourage collaboration and reduce the number of planning authorities in Wales.

Some participants are uncertain if a National Park designation is the most appropriate mechanism to achieve additional planning controls and protections beyond the protections and provisions afforded by the existing National Landscape designation. Some participants are concerned that although the designation would focus on protecting the landscape as it is presently, the nature of creating a new National Park could attract increased visitor numbers to the wider area, which could in turn place additional strain on existing infrastructure such as local roads and parking.

Some highlight the need to balance economic development with environmental protection. An example cited is that undergrounding grid infrastructure may be preferred in a National Park to address additional

¹⁷ The data collected by NRW as considered in 3.1.4 illustrates that between 2016 and 2022 there was a negligible difference in the average performance of the National Park Authorities in Wales, compared with Planning Authorities in Wales, in relation to the average planning application approval rate, and the average number of days taken to determine planning applications.

landscape protections, but this has significant cost implications and could negatively impact wildlife and biodiversity, making it essential to consider the broader implications of National Park designation.

Many participants also highlight that if the National Park designation is to occur, there is a need to educate the public on the purpose of a National Park and overcome the perception that it adds a layer of restriction, as many individuals are concerned about additional bureaucracy and restrictions on local residents (in terms of planning controls and broader socio-economic matters).

There is also concern that a new National Park Planning Authority could be disconnected from local communities due to the rural and perceived isolated nature of the landscape, with head offices likely to be located far away from some residents.

Some participants consider National Park status would better represent the community of the area, helping ensure their needs and interests are considered more appropriately in planning and development.

4.9 Analysis of alternative models for the delivery of planning services

The Evaluation of Management Options Report (‘the 2024 Report’) explored whether the designation of a National Park is the best mechanism for managing the forces for change (issues and opportunities) with a consideration of:

- a) Business as usual: continuation of the management of the National Landscape.
- b) Valleys Regional Park: partnership approach as established to help the Welsh Valleys.
- c) South Pennines Regional Park: a previous prospective national park taken forward as a regional park through a partnership approach.
- d) Conservation Board: a management approach for a National Landscape.
- e) National Park: reflecting the anticipated scope of a future national park.

Planning functions were one area that was explored as part of the options, and this section does not seek to duplicate what has already been considered by NRW with LUC and summarised in section 2.3 of this report.

Relevant to alternative models for the delivery of planning services, an outline of the key findings of the 2004 Report is presented below:

Model	Scale of Influence	Statutory Basis	Management Planning	Forward Planning and Development Management	Funding
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National Park	Provides coordinated management of the entire Area of Search, ensuring comprehensive planning and addressing regional issues effectively	Have statutory purposes, giving greater weight to management plans and decisionmaking processes.	Requires a National Park Management Plan and LDP, integrating conservation objectives with planning for economic, social, and cultural issues	Prepares its own LDP, providing a single coordinated policy framework focused on National Park aims. Has development control powers, though there are alternative models for delivery.	Core funding through Welsh Government and local authorities, with opportunities to raise further income from other sources, including income diversification.
Conservation Board	Similar to National Park, offers coordinated management across the Area of Search		Requires a management plan prepared by the board	Planning control lies with local authorities, with National Landscape purposes reflected through national and local planning policy.	Core funding provided through Welsh government and grants.
Regional Park (nonstatutory)	Both provide coordinated management but lack statutory basis, limiting their influence	Non-statutory, lacking explicit reference in national policy, which limits their effectiveness	Non-statutory strategic delivery plan or managed through a partnership plan with action plans	Planning control lies with local authorities, with regional park purposes reflected through local planning policy.	Dependent on grant funding and in-kind contributions.
Model	Scale of Influence	Statutory Basis	Management Planning	Forward Planning and Development Management	Funding

National Landscape (Business as Usual)	Lacks coherence in managing the wider Area of Search, focusing only on the existing National Landscape	Statutory purpose for the existing National Landscape but not for the wider Area of Search	National Landscape management plan for Clwydian Hills and Dee Valley, but no mechanism for the wider Area of Search.	Planning control lies with local authorities, with National Landscape purposes reflected through national and local planning policy.	Funding from Natural Resources Wales and Welsh Government for the National Landscape, but no dedicated funding for the wider Area of Search.
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All things considered, the 2024 Report outlines how a National Park designation would provide the strongest integrating framework and greatest security for long-term management, addressing identified forces for change effectively. In particular, a National Park would have planning functions and also security of core funding via national park grant. Whilst a National Park designation would introduce new pressures (in terms of visitor numbers, patterns, funding and partnership working) it is considered to offer mechanisms to manage these effectively, drawing on the experience of other national parks. The report concludes that the statutory framework of National Park designation or creation of a new extended National Landscape provides the most robust mechanism for planning and managing the candidate area, helping ensure comprehensive and effective management of regional issues.

Building on this relevant work, this planning services review has completed three focused case studies considering:

- 1) Eryri National Park, with full planning powers.
- 2) South Downs National Park, with shared planning powers.
- 3) Cotswold National Landscape Conservation Board, which does not have direct planning powers but has an important advisory role in the planning process.

Each is considered in turn below.

4.9.1 Eryri National Park

The Eryri National Park Authority is an independent public body with statutory responsibility for the protection of the National Park. Although Eryri was designated as a National Park in 1951, the Park Authority did not become an independent body and Local Planning Authority until 1996.

The Authority has statutory functions to protect and enhance natural beauty, wildlife and cultural heritage, and to promote opportunities for the public to understand and enjoy the special qualities of the National Parks. In fulfilling these functions, National Park Authorities including Eryri are required to support the economic and social well-being of the National Park's local communities.

Eryri was officially designated as a National Park on 18 October 1951, following the enactment of the National Parks and Access to the Countryside Act 1949. The boundaries of the National Park were established in 1950 based on the recommendations of the then National Park Commission.

Eryri National Park Authority has eighteen members. The members are appointed by the Welsh Government, Cyngor Gwynedd and Conwy County Borough Council. Eryri National Park Authority employs over 100 staff.

In late 2020, the National Park's statutory management plan, Cynllun Eryri, was launched. The development of this plan represented a significant change in the Authority's approach, emphasizing collaboration and partnerships in the protection and enhancement of the National Park.

This initiative built on The Yr Wyddfa Partnership, which was established to create and implement a new management plan for Yr Wyddfa.

In November 2021, Cyngor Gwynedd and Eryri's National Park Authority formed a partnership to ensure the future sustainability of Gwynedd and Eryri. This collaboration aims to develop a Sustainable Visitor Economy Plan for the area, focusing on long-term sustainability and protection. The Gwynedd and Eryri Sustainable Visitor Economy Plan 2035 introduces a new approach to measuring the impact of tourism in the region. By engaging in discussions with local residents and workers, the Plan establishes principles designed to balance the area's needs and place communities at the forefront of those benefiting from the visitor economy. The Plan acknowledges the importance of the visitor economy while ensuring the protection and preservation of the area's unique qualities.

The National Park Authority is responsible for all planning and development matters within the boundaries of the National Park. Departmental responsibilities include:

- Receiving and dealing with planning and development applications and inquiries within the National Park
- Producing and developing a Local Development Plan that reflects the challenges facing the National Park, such as climate change
- Developing planning policies that protect and enhance Eryri's special qualities
- Protecting and celebrating the National Park's history and cultural heritage.

Key findings from the case study interview with representatives of the National Park Authority help to highlight:

- a) the success of the National Park's policy-making function, noting their efficiency in adopting and reviewing Local Development Plans, owing to the rural landscape and the focus on National Park purposes.
- b) the challenges in recruiting specialist staff, particularly Welsh speaking officers, and the resilience issues faced by a relatively small team. A focus on graduate traineeships is seen as a potential long-term solution to help train the future local specialist and Welsh speaking workforce, alongside potential resource coordination across the region between local authorities. This could help increase resilience in specialist roles, such as landscape officers, across North Wales to address occasional needs (the National Park occasionally needs to buy in specialist services, such as landscape architects and ecologists, due to the lack of demand / need for full-time positions).
- c) the emphasis on Welsh speaking staff, helping connect with local communities and protect the characteristics of the landscape.
- d) the funding structure of the National Park Authority, which includes contributions from the Welsh Government and local councils, noting that the allocation of resources is more consistent and less susceptible to political decisions compared to other local authorities.
- e) the collaborative efforts with neighbouring authorities on policy making and development projects, highlighting the importance of joint working and joined up thinking, which is considered to work well.
- f) the potential benefits of strategic planning with emerging Strategic Development Plans and the need for adequate funding, noting the positive impact of integrated transport planning on the National Park through the emerging Regional Transport Plan. An example was given of draft Regional Transport Plan policies focusing on sustainable transport connections and gateways to the National Park, which is seen as an opportunity unlocked through regional coordination, collaboration and strategic priorities.

4.9.2 South Downs National Park

The South Downs National Park is the newest of the UK's 15 National Parks. The South Downs National Park officially came into being on 31 March 2010 and assumed its full powers and duties from April 2011. However, the idea of a National Park in the South Downs can be traced all the way back to 1929. The South Downs is the most populous of the UK's National Parks. 117,000 live and work within the Park's boundaries with an additional 2 million people living within 5km of the Park.

There are 15 local authorities within the Park, which covers the counties of Hampshire, West Sussex and East Sussex and incorporates two areas previously designated as Areas of Outstanding Natural Beauty, the East Hampshire AONB and Sussex Downs AONB. The Park also includes the Queen Elizabeth Country Park near Petersfield.

The South Downs National Park Authority is run by a board of 27 Members:

- 7 are appointed by the Secretary of State through an open recruitment process
- 6 are nominated by Parish/Town Councils or Parish Meetings within the National Park
- 14 are appointed by each of the 15 local authorities covering the National Park area (Adur and Worthing have opted to share a place).

The Partnership Management Plan (PMP) is a key document that sets out the priorities for the South Downs National Park for 2020-2025, with the next iteration expected to be adopted in 2026 for the next five years. The Plan is the single most important policy document for the National Park. It consists of a vision, three linked strategic themes and 10 outcomes which set where we would like to get to by 2050. The themes and outcomes work together and have equal importance.

The South Downs Local Plan encompasses the entire National Park. It was developed through extensive public consultation with local communities and detailed examination by the Government's Planning Inspectorate, which found the policies to be sound with certain modifications. The Local Plan takes into account various factors pertaining to the special qualities of the National Park, including its landscape character, biodiversity, cultural heritage, Neighbourhood Plans, local housing and economic needs, and the impact of climate change.

The South Downs National Park Authority operates as a planning authority in its own right, and is responsible for all planning-related matters within the National Park. However, some local authorities deal with development management on its behalf through a process of delegation. Those 'host' authorities deal with all planning questions, advice and applications in their areas on behalf of the National Park, including:

- 1) Chichester District Council
- 2) East Hampshire District Council
- 3) Lewes & Eastbourne Councils
- 4) Winchester City Council.

The National Park Authority's planning officers then deal with all planning matters in the following Local Authority areas directly:

- Arun District Council
- Adur & Worthing Councils
- Brighton & Hove City Council
- Horsham District Council
- Mid-Sussex District Council
- Wealden District Council

- Minerals & Waste planning issues for Hampshire, East Sussex & West Sussex county councils.

Key findings from the case study interview with representatives of the National Park Authority help to highlight:

- a) the planning team includes members working on local plans, neighbourhood plans, minerals and waste, and major projects, with a focus on ‘significant’ applications and enforcement (the definition of significant involves the application of discretion and professional judgment).
- b) policy matters are handled in-house, ensuring consistency and focus on significant issues pertinent to the function of the National Park. The Park has benefited from the adoption of its Local Plan, which has directed policy and informed development decisions since July 2019. Prior to that the existing Local Plans of the local authorities formed the policy framework for the National Park, which in some cases were replaced by Joint Core Strategies. This iterative approach to the policy framework helped support transitional arrangements, and the adoption of the National Park’s Local Plan ultimately helped to create consistency, and reduce or avoid potential or perceived confusion and/or tensions from public and key stakeholders in the framework where there was a multi-plan position previously.
- c) the importance of having a single local plan for the entire National Park, which has simplified decisionmaking and policy application.
- d) the opportunities for the emerging Spatial Development Strategies (SDS) to help better coordinate regional priorities, which should reflect the importance of the National Park, and support the ongoing negotiations with constituent authorities about dividing housing need numbers, as the National Park does not have its own figure. The SDS could help resolve this tension.
- e) development management is largely delegated to local authorities, with four major authorities covering the majority of the National Park’s geography handling most applications within the National Park. The other smaller authorities have stepped away from this delegated arrangement over time largely because of economies of scale / resourcing challenges so to return development management functions in those authority areas back to the National Park. This hybrid approach means that the National Park deals primarily with smaller applications in the smaller authority areas, and relies upon the four major authorities to manage the majority of applications across the National Park’s area.
- f) the exceptions to development management arrangements are where the National Park ‘calls-in’ more significant applications that it considers it wishes to consider, effectively withdrawing its delegation of decision-making powers on a case-by-case basis. This seeks to ensure the National Park authority maintains control over the developments that are considered to have the potential to have the greatest impact on the National Park area. Whilst this approach could give rise to tensions between the different parties, on balance this approach is considered to work well.
- g) the National Park planning team handles around 5,000 applications a year, with a mix of smaller applications and major projects. Because of the scale of the geography and volume of applications a result, the Park benefits from a comparably large team. An organigram showing the roles and structure of the team is provided at Appendix D.
- h) planning enforcement is also delegated back to local authorities on the same arrangement as development management functions, again with a call-in facility for cases deemed to have the potential for a strategic impact on the National Park.
- i) the challenges of coordinating with multiple local authorities, especially when they had different local plans, and continue to have different systems and validation processes, particularly with joint admin teams across councils handling various tasks. A single portal for applications in the National Park has helped improved officer, external stakeholder and public interface with development management in the National Park area, but this often requires host authorities to work across different systems as well as plans.

- j) dedicated South Downs planning teams within the major authorities have improved consistency in policy interpretation.
- k) the specialist National Park role of a ‘link officer’ in coordinating applications and ensuring consistency in policy application. This has helped bridge the processes and management of planning services across authorities.
- l) the need for more in-house specialists and the challenges of maintaining relationships with local authorities while managing resources effectively. The National Park Authority has more in-house specialists than most local authorities owing to the functions it has, but still contracts out some services. Despite having a relatively flat budget and facing local government funding cuts, the National Park is considered to be better resourced than local authorities, making it more resilient to the challenges.
- m) the National Park Authority is generally better resourced than local authorities and can be more competitive in terms of salaries owing to its funding from Department for Environment Food and Rural Affairs (Defra), while local authorities have different funding sources. This difference in funding is considered to allow the National Park Authority to be more competitive in terms of recruitment.
- n) the potential impact of local government reorganisation in England on planning services and potential change in the South Downs model. There may be a need for additional office space and resources, anticipating that the authority may need to take all planning services back in-house in the future. However, this could help resolve ongoing general confusion among the public regarding responsibility for planning services due to the delegation system, with a potential lesson learnt for others around limiting the delegation method to a few big partners rather than many smaller ones to help simplify coordination and improve consistency.

4.9.3 Cotswold National Landscape

The Cotswolds National Landscape has been a designated Area of Outstanding Natural Beauty (AONB) since 1966. It is the largest of 46 AONBs in England, Wales, and Northern Ireland. The Cotswolds is the third largest protected landscape in England, after the Lake District National Park and the Yorkshire Dales National Park. It stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north. It cuts across 15 local authority areas.

The Cotswold National Landscape is an independent statutory body that takes the form of a Conservation Board, established by Parliamentary Order in 2004. It has 37 Board members drawn from local authorities, parish councils, and appointments made by Defra.

The Cotswolds National Landscape boundary encompasses multiple planning authorities, including district and borough councils, county councils, and unitary authorities. These have the responsibility for housing allocations and development decisions through planning policy and development management functions. Like all public bodies in England, local authorities have a legal duty to ‘seek to further’ the purpose of conserving and enhancing the natural beauty of the AONB¹⁸.

The Conservation Board does not have any direct powers over planning and development, it does not produce a Local Plan or make decisions on planning applications. It has a small planning team that provides responses on behalf of the Conservation Board in respect of planning policy and development management matters (including enforcement appeals etc.). Consultation thresholds tables as published by the Cotswolds National Landscape¹⁹ show which development management (planning applications and appeals) consultations they seek to provide responses to, and the level of detail of the response.

It comments as a consultee on emerging plans and major planning applications, and prepares guidance for householders, architects, and developers, which can also assist councils and others who are writing plans or

¹⁸ The equivalent duty in Wales is to ‘have regard to’, for both National Parks and National Landscapes.

¹⁹ <https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/02/CNLB-Consultation-Thresholds-tabulated-Oct-2024.pdf>

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making decisions on the practical ways in which development can be managed to conserve or enhance the Cotswolds.

As such the Cotswolds National Landscape planning team regularly works with local planning authorities, government agencies, infrastructure providers, and individual property owners in an advisory role. It brings a thorough understanding of local landscape character, sensitivities, and the capacity for accommodating change as part of its planning advice. It focuses on influencing:

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- National legislation and policy: reforms of the planning system and other relevant legislation, changes to the National Planning Policy Framework, updates to government's good practice guidance.
 - Regional strategies: for housing, transport, and infrastructure.
 - Local plans: local planning authorities produce statutory plans for general development, minerals extraction, waste recycling/disposal and transport provision.
 - Neighbourhood plans: plans produced by individual communities.
 - Development proposals and planning applications and other site-specific proposals.

Key findings from the case study interview with representatives of the National Park Authority help to highlight:

- a) the importance of the Cotswolds National Landscape Management Plan, which is a statutory plan, setting out the vision, outcomes and policies for the management of the Cotswolds National Landscape. It is published in consultation with stakeholders, including local authorities. This plan serves as a key reference point for their advisory input into planning processes. Various position statements then expand on the policies in the Management Plan, providing additional guidance on topics such as renewable energy, tranquillity, dark skies, and landscape-led development. These statements are used as reference points in their advisory input.
- b) as part of its decision making as to what to get involved with as a consultee or interested party, it has published guidance on what it refers to as 'primary threshold' and 'secondary threshold' consultations. The 'primary threshold' consultations are those consultations that it considers it should respond to (and be monitored against) if it were to become a statutory consultee. The 'secondary threshold' consultations are smaller scale proposals that could still potentially adversely affect the natural beauty of the Cotswolds National Landscape and seek to respond to those where its team has the capacity to do so. It seeks to provide bespoke responses to consultations that are above the primary consultation thresholds whereas it tends to provide more standard responses to consultations that are above the secondary consultation threshold to help manage resources proportionately.
- c) the Cotswold National Landscape is not a statutory consultee for planning purposes, except, as a Conservation Board, for Nationally Significant Infrastructure Projects (under the Planning Act 2008). However, for the most part, the Conservation Board considers it is often treated by third parties in a similar way to how a statutory consultee would be treated in the planning process (for example, it is often proactively consulted by local authorities, with its responses being given appropriate weight in decision making).
- d) involvement in enforcement is generally limited and reactive.
- e) participation in planning appeals varies, noting that the authority sometimes acts as a 'rule six party' (interested parties involved in an inquiry for planning appeals and called-in applications in England). This often involves preparing detailed evidence, being cross-examined, and cross-examining others, which can be resource-intensive for an authority with limited resources.

- f) there is an opportunity in the English context, which could be applicable as a lesson for Wales in the context of a proposed National Park and any future relationship with NRW, in that Natural England is a statutory consultee that often defers in its own consultation comments to the Conservation Board for advice on impacts on the National Landscape. As a result, sometimes they express no objection to a proposed development with a 'subject to' qualification, which can often be interpreted by the Local Planning Authority as Natural England having no objection to applications that the National Landscape does object to. There have been instances where their no objection has been given greater weight, as a statutory consultee, than the Conservation Board's objection despite Natural England not being a statutory consultee in relation to national landscapes.
- g) the Conservation Board monitors (and advises accordingly) on policy level references to the National Landscape and its Management Plan in Local Plans. It has also prepared suggested wording for a Local Plan policy on the Cotswolds National Landscape to help facilitate a consistent policy approach.
- h) the Conservation Board monitors whether the decisions that are made by local authorities or planning inspectors on planning applications and appeals that it has commented on are in line with its advice and recommendations. This helps it evaluate its role and performance to some extent, and the results are favourable with an average of 73% of decisions on applications being decided aligned to its advice and recommendations over the past four years. The conclusion is that the Conservation Board's input positively influenced the outcomes. Where decisions are not considered to be in line with its advice and recommendations, this is often attributed to the need for local authorities to balance a shortfall in housing land supply in its decision making on planning applications for residential development. In some cases, the Conservation Board accepts there are differences in professional judgement as to whether there would be any adverse effects on the natural beauty of the National Landscape and what the significance of these adverse effects would be.
- i) the Conservation Board monitors whether the decisions that are made on development management proposals that it has commented on explicitly addresses the statutory duty to seek to further the purpose of conserving and enhancing the natural beauty of the National Landscape. For 2024/25, this figure was only 19%, which has triggered a need for proactive engagement with local planning authorities.
- j) the Conservation Board has a planning-related key performance indicator (KPI) based on the percentage of proposals, above its primary consultation thresholds, that it is proactively consulted on that receive a substantive response by the original consultation deadline. It sets this KPI to help evaluate how it performs and if we were a statutory consultee. A 'substantive response' can be either a bespoke response or a standard response (in line with Article 22 of The Town and Country Planning (Development Management Procedure) (England) Order 2015). For 2024/2025 this KPI figure is 90%. In 2024/2025 the Conservation Board provided 169 substantive consultation responses (including secondary consultation threshold proposals), of which 96 were bespoke responses.
- k) the vast majority of the development management consultation responses are written and submitted by one member of staff who works the equivalent of two days per week (0.4 FTE), overseen by a planning manager who works full time (1 FTE). To support resourcing and resilience, it applies a culture of flexibility for dealing with varying workload pressures through the year, for example it may only deal with primary consultation threshold proposals if necessary, or it may provide standard responses rather than bespoke responses.
- l) the Conservation Board would support an annual forum with planning colleagues from local authorities to discuss planning issues related to the national landscape, although this has not been implemented yet.

5. Summary and key findings

This planning services review has considered the comprehensive body of previous relevant work, both directly and indirectly pertinent to considering the potential implications for planning services in connection with a proposed new National Park. This highlights the importance of resilient and high-performing planning

authorities, noting that adequate funding and effective governance and management are crucial for the success of any proposed National Park authority. The proposal to increase planning application fees and move towards full cost recovery is considered essential for funding planning activities, and the reintroduction of the Performance Framework to monitor and improve the performance of LPAs is also important to ensure the success of any new National Park planning authority. Regional coordination opportunities are highlighted, pointing to the CJs as new authorities that could help benefit resource coordination and set strategic priorities. National Park designation could be perceived to lead to less development and demand for development management services as a result. However, the importance of plan making and purpose driven decision making requires additional specialist advice and resourcing.

This planning services review has benefitted from a data collection and analysis exercise (Section 3), providing insights into the potential resources and funding implications for planning services in connection with a proposed new National Park. In summary:

- Within the Candidate National Park Area, in the last 5 years there has been nearly 2,000 planning applications. Of this total, the vast majority have been minor planning applications, which is comparable to Eryri National Park with an average of 400-500 planning applications a year (also mostly minor planning applications).
- When considering total planning applications in the candidate area per FTE staff employed for development management services, this shows on average 130 applications per FTE, which compares to 44 applications per FTE in Eryri.
- The total annual fee income from planning applications within the Candidate Area is £487,000 (on average across the authorities £122,000), which is comparable to Eryri National Park's annual planning fee income of £146,000 (acknowledging its national park area is notably greater in geographic scale and the types of applications are mostly minor, which typically attract lower planning fees).
- The average annual budget for existing local authorities allocated to providing development management services within the Candidate National Park Area is £143,000. The budget for forward planning services (planning policy) averages £302,000. This compares to Eryri National Park's budget of £725,000 for development management (taking into account £146,000 fee income) and £283,000 for policy work.
- The annual staff costs associated with undertaking development management services totals an average of approximately £380,000 across relevant local authority areas, compared to £668,000 at Eryri National Park.
- The estimated third party and consultant costs associated with the development management service averages £20,000 per annum across relevant local authority areas, compared to £50,000 at Eryri National Park.

This planning services review has explored and considered with key stakeholders a range of different perspectives and opinions about the potential implications for planning services in connection with a proposed new National Park. Overall, sentiment from stakeholders is mixed, ranging from cautious optimism about the opportunities a National Park designation could offer, to multiple concerns about the resourcing, cost and policy implications of a new National Park.

In summary:

- Concerns have been raised about the budget and resourcing challenges facing local authorities in Wales and beyond, and in relation to the funding for a new National Park and its impact on existing services. There are mixed views regarding the potential income loss from planning applications and reduced development in the candidate area as well as the feasibility of a new National Park Planning Authority during a heightened time of financial pressure on public services, weighed against the possibility of attracting future funding and resources in the candidate area through increased tourism and political profile that could lead to additional environmental and social projects in connection with protecting and enhancing the landscape.

- There is also concern about the shortage of planners in Welsh local authorities, especially those with Welsh language skills. It is considered that establishing a new planning authority in Wales will only exacerbate existing resource challenges and create further disparities in planning service delivery. The need for specialist roles in a National Park is likely to increase the demand for landscape, ecology and historic environment experts, and could lead to further dependence on external consultant support to respond to peaks in demand for such advice. A proposed new National Park could provide an opportunity to further consider and extend shared services among local authorities, as well as consider the potential role of CJs in regional specialist resource coordination.
- The impact of a new National Park on ongoing and planned LDPs and their replacements are a significant area of concern. The potential requirement to review or restart plan making processes due to boundary changes is considered to represent a large programme, cost and policy risk by existing authorities. There are also implications for emerging SDPs, which may offer a potential advantage subject to timing, where a new National Park Planning Authority could pursue an LDP 'Lite' with associated time and financial savings. The impact on existing policies and the need for clarity around policy gaps or tensions until a potential National Park LDP is in place, represents another key concern.
- Clear transitional arrangements and guidance for local authorities, developers and officers is deemed essential to address policy gaps and manage development management services during any transitional period. Examples from other National Parks have been cited as lessons learnt, such as the phased approach of the South Downs National Park to introduce its own local policies over time.
- Significant concerns have also been raised about the potential displacement effects on housing, renewable energy generation and distribution development, and mineral extraction activities due to a potential National Park designation. It is stressed that local planning authorities and planning committees have the future resources and skills to manage these effects and different demands through local plans and decision-making processes.

Various models for delivering planning services within the National Landscape and Candidate National Park Area have been discussed, including the existing arrangements for National Park Planning Authorities in Wales, through to a delegated services approach, and advisory Conservation Board option. There is no consensus between stakeholders, with opinions differing substantially from a preference to maintain the status quo and business as usual approach, to support for a new National Park designation with new local planning authority powers and functions. This planning services review has undertaken a case study analysis including focused discussions with key stakeholders about alternative delivery models for planning services, which have identified lessons learnt of relevance to a potential new National Park. These include:

- The benefits of a dedicated planning function focusing on National Park purposes and outcomes, bringing consistency and certainty. A single local plan and dedicated development management team for the National Park simplifies policy application and interpretation, and helps all stakeholders understand the policy position. Tensions often arise when there are multiple plans in place, or policy gaps.
- Tensions can also arise when decision making powers are delegated between too many parties. On a related point, confusion around responsibilities can arise when there is a hybrid approach to decision making between different authorities, but delegation can help focus resources on priorities.
- The broad variation between models in terms of resources and skills needed. National Park Planning Authorities require sufficiently resourced policy and development management as well as enforcement officers alongside supporting staff and systems. Additional specialists are needed within National Park planning authorities, typically focusing on landscape, cultural heritage and ecology advice, with varying levels of reliance on consultant support or shared services.
- Challenges in recruiting staff are not limited to local planning authorities, and there are resilience issues faced by relatively smaller teams, whilst dedicated funding streams can help attract and retain talent.

- The challenges of coordinating with multiple local authorities, especially when they have different local plans, and continue to have different systems. Collaborative efforts with neighbouring and/or host authorities is essential on policy consistency and decision making especially for cross border development projects.

The key findings present a range of tensions and potential compromises that NRW may need to consider. These primarily relate to:

- a) National Park designation could lead to less development and demand for development management services, and result in less major applications and more minor applications. This has an implication in terms of likely lower planning fee incomes.
- b) National Park designation could provide greater policy clarity and consistent decision making, acknowledging transitional arrangements will be critical to managing policy inconsistencies, potential delays and gaps during a period of local development plan preparation and replacement, which will incur financial and staff time costs.
- c) National Park designation could lead to distributional / displacement effects where neighbouring authorities may need to consider and respond to increased demand for housing and strategic development (such as energy or mineral products related) outside the National Park area, and/or manage the need for such development within the National Park area in the national interest.
- d) National Park designation could require additional specialist advice and resourcing, which could increase demand for planning and other relevant experts within the existing region and Wales, where resources are already in demand and limited.
- e) Different delivery models offer different levels of planning powers and controls over development in the landscape, balanced with varying resourcing, collaboration, and funding requirements.

Appendix A Engagement Log

Stakeholder engagement activities involved:

- **18 no. 1-2-1 deep-dive discussions** with key leaders and professionals across the Welsh planning landscape.
- **3 no. case study deep-dive discussions** were undertaken with Eryri, Cotswolds and South Downs National Parks.

Stakeholder organisations engaged throughout this project are summarised below, with details of representatives and meetings.

1-2-1 interviews

Organisation	Representative	Date of interview
Gwynedd Council	Linda Lee, Senior Planning Officer Rebeca Angharad Jones, Planning Policy Manager	19 th March
Tirweddau Cymru - Landscapes Wales Clwydian Range and Dee Valley AONB	Dave Williams, Planning Advisor Howard Sutcliffe, Lead Officer	24 th March

Powys County Council Mid Wales Corporate Joint Committee (MWCJC)	Councillor Jake Berriman	24 th March
Mineral Products Association Wales (MPA)	Nick Horsley, Director of Planning David Harding, Secretary	24 th March
Wrexham County Borough Council	Chris Smith, Team Leader	27 th March
Renewables UK Cymru	Jessica Hooper, Director Manon Kynaston, Assistant Director	27 th March
Denbighshire County Council	Lara Griffiths, Principal Planning Officer Adrian Walls, Highways Information Manager	31 st March
Wales Environment Link / Campaign for National Parks	Ruth Bradshaw, Policy and Research Manager	1 st April
North Wales Corporate Joint Committee (NWCJC) (Ambition North Wales), & Flintshire County Council	Alwen Williams, Interim Chief Executive Andy Roberts, Strategic Development Plan Manager Tom Woodhall, Access & Natural Environment Manager	1 st April
Natural England	Andrew Baker, Senior Environmental Specialist	1 st April
Organisation	Representative	Date of interview
Country Land Business Association (CLA) Cymru	Sarah James, Policy and Engagement Adviser Fraser Mcauley, Policy Development Lead	
National Farmers' Union	Gwawr Parry, County Adviser for Clwyd and Montgomeryshire	2 nd April
Welsh Local Government Association (WLGA)	Fiona Clay-Poole, Policy Officer	2 nd April
Royal Town Planning Institute (RTPI) Cymru	Mark Hand, Director of Wales, Northern Ireland and Planning Aid England	4 th April
Farmers' Union of Wales	Emyr Davies, County Executive Officer	8 th April
Planning Officers Society Wales (POSW)	Tom Evans, Placemaking and Strategic Planning Manager, Swansea Council	9 th April
Welsh Government	Neil Hemmington, Chief Planner Mark Newey, Head of Plans Branch	10 th April

Case Studies

Organisation	Representative	Date of interview
Cotswolds National Park	John Mills, Planning Lead	8 th April
South Downs National Park	Claire Tester, Planning Policy Manager	9 th April
Eryri National Park	Jonathan Cawley, Chief Executive Officer	11 th April

Appendix B Stakeholder questions and prompts

1-2-1 stakeholder interviews

The following questions and prompts helped to structure the 1-2-1 stakeholder interviews:

- 1) What involvement or interest does your organisation have with planning services provided within the Candidate National Park Area?
- 2) What do you consider to be the potential implications of a National Park Planning Authority on the operation and delivery of the planning service across Local Authorities and the Corporate Joint Committees (CJCs) within the Candidate National Park Area?
 - a. What do you consider to be key challenges and opportunities with the proposed National Park and provision of forward planning services associated with it? In particular, considering the current and emerging Local Development Plans, Strategic Development Plans and Regional Transport Plans.
 - b. What do you consider to be key challenges and opportunities with the proposed National Park and provision of development management services associated with it?
 - c. What do you consider to be key challenges and opportunities with the proposed National Park and provision of planning enforcement services associated with it?
 - d. Do you have any thoughts around the resourcing (finance, funding and staff) of the proposed National Park planning service, and any potential implications across existing Local Authorities and the CJCs?
 - e. Are there any skills, gaps or roles you think that would be needed in a new National Park Planning Authority that are currently not available or needed within the existing Local Authorities? Where do you seek technical advice internally (e.g. landscape, biodiversity etc.) and is there a concern this could be lost to a new National Park unless some mechanism can be put in place to share services?
 - f. Do you have any thoughts about potential displacement effects on areas not within the existing national landscape area?
 - g. Do you have any thoughts about models for the delivery of planning services and which may be most appropriate for the proposed National Park? In particular, considering:
 - i. A National Park Authority with full planning powers, as per Eryri;
 - ii. A National Park Authority with shared planning powers where it is responsible for the planning and enforcement matters within 'Recovered Areas' and defers to other local authorities in 'Delegated Areas', as per the South Downs in England; and
 - iii. AONBs or National Landscapes with Conservation Boards where planning powers rest with the constituent local authorities, planning services do not have decision making powers but

influence as consultees on emerging plans and major planning applications, and prepare guidance, as per the Cotswold National Landscape Conservation Board in England.

- h. Do you have any thoughts about a potential transitional arrangement period?
- 3) Do you have any examples of good practice as lessons to be learnt for the proposed National Park Planning Authority?
- 4) Are there any improvements you consider would help to improve delivery of planning services within the designated landscape area?

Case studies

Case study interviews also explored:

- 1) What is your experience with establishing planning services and/or input for a new National Park or Conservation Board?
- 2) What model does your authority operate to deliver planning services (forward planning, development management and enforcement)?
- 3) What works well in relation to the delivery of planning services (including examples of good practice)?
- 4) What does not work so well in relation to the delivery of planning services / what barriers exist to effective delivery of planning services?
- 5) Are there any improvements you consider would help to improve delivery of planning services?
- 6) What resources do you need to deliver planning services, and how might that differ from a Local Planning Authority outside of a National Park or AONB?
- 7) Do you face resource challenges and if so, how?
- 8) What do you consider to be the main impacts of the National Park/AONB on their local authorities, and how do you work with them to mitigate or resolve those impacts?

Appendix C Datasheet

Appendix D South Downs National Park Planning Organogram

