

Amgylchedd a Datblygu Cynaliadwy  
Environment and Sustainable Development



Llywodraeth Cymru  
Welsh Government

Tracy Nettleton  
Strategy and Policy  
Brecon Beacons National Park Authority  
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Eich cyf : Your ref LDP Additional Focussed Changes Consultation  
Ein cyf : Our ref qa954107

3rd October 2012

Dear Ms Nettleton,

### **Brecon Beacons National Park – Consultation on Additional Focussed Changes**

Thank you for your letter of 07<sup>th</sup> September 2012 notifying us of your Additional Focussed Changes Consultation. It is noted that the Statement of Additional Focussed Changes is accompanied by a Sustainability Appraisal Report Addendum which includes consideration of the proposed changes.

The LDP is currently under Examination by an Independent Inspector. As part of the Examination the Inspector produced two Preliminary Notes setting out her concerns with the Deposit Plan and held an Exploratory Meeting in March 2012.

The rationale for producing Additional Focussed Changes (AFC's) is noted as being to address the concerns highlighted by the Inspector in her Preliminary Notes, and that the changes have been informed by 'additional work' undertaken by the Park Authority, in particular, by Nathaniel Lichfield and Partners (NLP) - 'Assessment of Future Need for Housing, 'Housing Supply Assessment' and 'Employment Land Review. This additional work is supported and it is considered that the Authority has made considerable progress in addressing the Inspectors concerns. While it is understood that these documents do not form part of this consultation, it is considered that as this additional work underpins many of the changes, reference has been made to this work, where appropriate, in support or objection to the proposed AFC's.

With regard to focussed changes and their role in plan preparation, Circular Letter CL-01-2009 clearly sets out their purpose, specifically being appropriate only in exceptional circumstances. Whilst it is acknowledged that the current changes are necessary, I am concerned that further changes may be required due to the need to address the affordable



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housing issues highlighted by the Inspector. The purpose of publishing Focussed Changes is to redress specific issues and they not become a process in themselves. Focussed Changes should be kept to a minimum, both in their number and iterations.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The AFC's have been considered in the light of the representations made to the Deposit Plan, the 'initial' Focussed Changes consultation, and in accordance with the tests of soundness. In particular, the consistency, coherence and effectiveness tests and whether the Plan has had satisfactory regard to national planning policy – test C2, whether there are clear mechanisms for implementation and monitoring – test CE3 and whether it is reasonably flexibility to enable it to deal with changing circumstances test - CE4.

Indicated in the attached annex is whether the AFC's meet the matters raised in our deposit and initial Focussed Change Representations. Accordingly, some reservations still remain with regard to:

**The lack of flexibility within the plan;  
Deliverability of the housing requirement in relation to infrastructure constraints;  
There is a lack of additional work in relation to affordable housing and viability (In respect of the Inspectors concerns in her Exploratory Notes); and  
Consistency with national planning policy and some further issues that require clarification in the annex**

It is considered that it may be possible for the above matters to be addressed and explained as part of the hearing sessions or as Matters Arising Changes (MACs) if deemed necessary by the Inspector.

It is understood that the Authority is in the process of commissioning consultants to provide additional work in relation to affordable housing and deliverability. This work is intended to address the concerns raised by the Inspector in her Exploratory Notes. While this work is supported, it would have been beneficial if this work was published at the same time as the additional evidence.

It is likely that this work could result in additional policy changes that may require further consultation and may cause potential delays. It is essential that this additional work is publicly available by the end of November in order that any LDP Hearing Statements may reflect upon that work.

Yours sincerely

**Mrs Lydia Haskey  
Senior Planning Manager  
Plans Branch  
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***annex***