

## Appendix 2 – Summary of NRW's Response to Cyngor Gwynedd's Comments on Previous Consultations

Summary of Issue Raised	NRW Response	Cyngor Gwynedd Comments
<p><u>The impact on house prices</u></p> <p>Research undertaken by Nationwide shows that house prices can rise by up to 25% within a National Park and a number of people from Gwynedd are already being priced out of the housing market because of the high price of houses compared to the county's average wage.</p>	<p>NRW has commissioned ARUP to undertake an Economic impact report that addresses these issues.</p> <p>The report agrees that average house prices within National Parks are generally higher than neighbouring areas and recognises that it can lead towards a potential increase in demand for housing and limited supply. But the report notes that NPAs can implement policies to limit house prices and highlights the Snowdonia National Park LDP's policy of prioritising housing for local communities, with new developments usually limited to small-scale housing or affordable housing for local residents.</p>	<p>Note the comment.</p>
<p><u>The rural economy</u></p> <p>The area around Llandderfel is very rural where agriculture is one of the main industries. Diversification is important for the agricultural sector and can help the viability of businesses in the countryside. The concern is that</p>	<p>NRW has commissioned ARUP to undertake an Economic impact report that addresses these issues.</p> <p>The report acknowledges that there is potential for increasing restriction on</p>	<p>Note the comment.</p>

<p>a new National Park designation will introduce more stringent policies regarding developments that are acceptable within the area.</p>	<p>commercial development in national parks.</p> <p>The report also notes that National Park status can raise area recognition at an international level, offering promotional benefits for local products such as beef, lamb and venison, helping producers secure premium prices. The 'Ffermio Bro' scheme, for example, is now available to farms within a National Park or National Landscape.</p>	
<p><u>The visitor and tourism economy</u></p> <p>Over-tourism is an issue of concern in parts of Gwynedd particularly in Eryri National Park. This leads to parking problems, congestion on the local roads, litter and pollution leading to conflict with the local community. There is concern that the designation of a National Park in this area will lead to an increase in the number of people visiting the already popular area and therefore lead to an exacerbation of these problems. In addition, the designation of a National Park could lead to an increase in the number of second homes and short-term holiday lets.</p>	<p>NRW has commissioned ARUP to undertake an Economic impact report that addresses these issues.</p> <p>The report acknowledges that in addition to increased spending, additional visitors also bring a risk of overtourism. This could create pressures in certain locations and on transport and services. However, a new NPA could also help mitigate these impacts by providing targeted control of the area, along with wider policies such as the proposed visitor tax in Wales.</p>	<p>Note the comment.</p>

<p><u>The Welsh language</u></p> <p>The issues identified above e.g. the lack of availability of housing which is affordable for local people can have a negative impact on the Welsh language.</p> <p>The research that Gwynedd Council has undertaken to justify the introduction of Article 4 guidance clearly shows that there is a correlation between high numbers of second homes and short-term holiday accommodation and the Welsh language.</p>	<p>NRW has carried out an impact assessment on the Welsh language which states that the designation of a new National Park is unlikely to have a negative impact on the Welsh language, affect the use of Welsh, or treat Welsh less favourably than English.</p>	<p>The proposed area to be included in the new National Park in North West Wales includes parts of Gwynedd that are recognised as one of the strongholds of the Welsh language, where it is used on a daily basis. Incorporating these communities into a new Local Planning Authority comprising several unitary authorities – many of them with lower levels of Welsh language use – could risk weakening the focus on Welsh considerations in planning and policy. This could have a negative impact on the status of the language and everyday use in an area where it is currently thriving.</p> <p>Although an assessment of the impact of the Welsh language has been carried out, the Council does not consider that the negative impact on the Welsh language can be mitigated in the proposed area which falls within the Gwynedd LPA.</p>
<p><u>Planning</u></p> <p><u>Planning Policy</u> - The final decision on the designation of the new national</p>	<p>Under legislation, a National Park Authority ('NPA') would be the Local</p>	<p>The only fact we have is that the new</p>

<p>park will be made around the same time that Cyngor Gwynedd holds its public consultation on the Deposit Plan (Local Development Plan). We need guidance from the Welsh Government / NRW on how Gwynedd's new Local Development Plan should deal with the proposed national park in the area within Gwynedd</p> <p><u>Development Management</u> - Guidance is needed on how planning applications are dealt with in the area of the new National Park in Gwynedd. Will Gwynedd Council's Development Management Service maintain this service until the new Local Planning Area (LPA) is established and new staff are appointed? Or will this service be externalised to Gwynedd Council for a fee once the LPA is established?</p>	<p>Planning Authority ('LPA') for the National Park boundary and would be responsible for Forward Planning (Local Development Plan ('LDP')) and Development Management.</p> <p>The Planning Services Review report prepared by Arup includes alternative models for delivering the planning service. No decision has been taken on this yet, as a new APC would need to be considered, if one is created, in partnership with the local authorities within its boundaries and Welsh Government. The report produced by Arup will help inform any future discussions.</p> <p>LPAs have raised concerns in relation to wasted resources if LDPs need to be rewritten on the confirmation of a new National Park. NRW has considered the future timeline for the establishment of a NPA and the transfer of planning functions and considers that the risk to LPAs of abandoning existing or developing LDPs is low, particularly where the area being proposed is already an AONB and therefore unlikely to feature heavily in any LDP.</p>	<p>National Park will be a Local Planning Authority.</p> <p>No decision has been made as to what type of planning service the new national park will have, so we cannot be certain that there will be no negative impact on existing planning services.</p> <p>With regard to the LDP, it is incorrect for NRW to state:</p> <p><i>"...considers that the risk to LPAs of abandoning existing or developing LDPs is low, particularly where the area being proposed is already an AONB and therefore unlikely to feature heavily in any LDP"</i></p> <p>The guidance we have received from the Welsh Government's Planning Division is that no LDP should include parts of a different Local Planning Authority.</p> <p>The pending decision to designate the new national park or not may have an impact on the Gwynedd LDP's timetable.</p>
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	<p>This issue can be monitored and discussed between the LPA and Welsh Government, given it is ultimately Welsh Government who has control over the timing of confirming a Designation Order.</p> <p>In respect of individual planning applications, it is unlikely that the proposed existence of a National Park will impact most decisions as, in many cases, development will fall within permitted development rights that exist currently.</p> <p>However, for Developments of National Significance, it is recommended that LPAs advise developers that a new National Park is developing and that they should be aware that, should they choose to proceed with their application, they would be proceeding at risk. The materiality of a new National Park will increase further into the process, and it is suggested that LPAs seek their own legal advice in respect of those more complex matters.</p>	
<u>Funding</u>		

<p>More information is needed on how the new National Park will be funded. It is noted that 25% of National Park funding comes from the constituent Local Authorities. In the current financial climate faced by all public bodies, there are significant concerns about the additional burden this will place on the Council during very challenging times financially.</p>	<p>We are pleased to note that, following representations in relation to this issue and your calls for clarity, the Deputy First minister for Wales has responded and written to Local Authorities. (a copy of the letter can be found in appendix 3). The Deputy First Ministers letter includes the comments:</p> <p><i>"it is absolutely vital that a new National Park is properly funded without reducing the core funding for our existing National Park Authorities, or by reducing the funding available to Welsh Local Authorities. We are committed to this principle"...</i></p> <p><i>"I have considered the likely core revenue costs arising from the Environment Act 1995 (EA 1995) that require funding from Welsh Government and a NPA's constituent Local Authorities. The Welsh Government is committed to providing additional funding to fully cover both of these requirements should a new National Park be designated. That is to say, there would be no financial burden placed on your Council to provide funding to a new National Park,"</i></p>	<p>Glad to receive a letter from the Deputy Minister but it does not provide reassurance.</p> <p>NRW's response states that the Welsh Government has given assurances that Local Authorities will not be financially disadvantaged but as the Welsh Government is not receiving additional funding for the new national park, there is no information as to where this funding is coming from.</p>
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### Governance

There are currently no details on how the new National Park will be Governed. Clearer details on this will be required before the statutory consultation, to give Cyngor Gwynedd a reasonable opportunity to give an opinion on this.

Will the Council would want to be one of the authorities represented or contribute to the Authority? This would be similar to the situation in the south of Snowdonia National Park which is within the boundaries of Powys Council but they are not part of Snowdonia National Park Authority

We recognise that the proposed boundary includes a small area of Gwynedd (just over 11 km<sup>2</sup> and less than 2% of the total area). Also only the settlement of Llandderfel is included. This raises questions about the symmetry of governance implications. We have raised this with the Welsh Government and set a relevant precedent in relation to other comparative examples in Wales. However, we currently expect that Gwynedd County Council would be represented on the National Park Authority (NPA).

The new APC administrative area will encompass a number of unitary authorities. These unitary authorities will retain responsibility for local government services, other than planning, for which responsibility will fall on the new APC. Proper governance would be carefully considered as part of a transition and establishment period, should a National Park be ratified. This goes beyond the role of NRW, which is solely tasked with carrying out the assessment. NRW

There are no details on how the new National Park will be governed. Details are needed regarding if the Council will be represented or contribute to the Authority or not.

As no sound guidance has been provided on this issue, although we raised the issue in our previous consultation response, Gwynedd Council is unable to comment on this.

	would expect Gwynedd County Council, as a member of the potential new APC, to be able to contribute to initial discussions on governance.	
<p><u>Candidate Area and the need for a new National Park.</u></p> <p>The area of Gwynedd considered to be part of the National Park borders the Snowdonia National Park. Was this area considered when determining the boundaries of Eryri? If so, why wasn't it included within the boundary of Eryri National Park? What has changed in terms of the landscape of the candidate area since the designation of Eryri National Park and the Vale of Clwyd and Dee Valley AONB? There are five National Landscapes in Wales - is there a particular reason for choosing this area over any other?</p>	<p>The current proposals have a historical basis in terms of consideration previously given to the area. The Report of the National Parks Committee (England and Wales) chaired by Sir Arthur Hobhouse identified the land of a National Park and potential Areas of Conservation (later known as AONB and National Landscapes) which included the Clwydian Range and the Berwyn. The area of Gwynedd which is included within the existing proposed boundaries of Glyndŵr National Park was originally identified by Hobhouse as AONB land possible to be included in Y Berwyn.</p>	<p>Gwynedd Council is not satisfied with the reason given in NRW's response for including part of Gwynedd in the new National Park.</p> <p>It was noted that the area of Gwynedd which is included within the current proposed boundaries of Glyndŵr National Park was originally identified by Hobhouse as possible AONB land to be included in Y Berwyn and not to be included in Snowdonia National Park. It is not clear what has changed in the landscape to be included in the new national park.</p>