

# Issue 9 Policy 3.12(2) Low impact residential development

## Response to Inspector's Questions

James Shorten

Q1. Would the requirements for this type of development be reasonable and proportionate? Would the policy strike the right balance between enabling low impact residential development and conserving the natural beauty, wildlife and cultural heritage of the National Park?

- I remain concerned about the locational requirements of the policy. There is potential confusion across criteria a), b) and g) as to whether different sorts of development are envisaged close to settlements and away from them, or whether all development covered by the policy is intended to be close to a settlement. If the latter, this is potentially unreasonable as:
  - Such development is essentially intended to be mostly self-sufficient, and as such does not rely on proximity to a settlement for its sustainability 'performance'
  - Sites for this type of development need to mainly be dedicated to land-based activities, which are often found away from settlements – requiring them to be close to and 'proportionate' to settlement may partly nullify the potential and intentions of the policy
  - Criterion g) is sensible, but implies that it is envisaged that some developments may not be 'outside' settlements
  - Criterion f) addresses the natural beauty, wildlife and cultural heritage of the National Park. Experience in Wales of OPD (One Planet Development), in Pembrokeshire Coast and the Brecon Beacons National Park, has shown that this is readily achievable. In the National Park context criterion c) underlines this.

Q2. Is a modification required, in the interests of soundness, to provide clarity on the timeframe within which compliance with a business plan should be achieved? Should a monitoring mechanism be included?

- A timeframe is needed in the policy – without one the policy is open to abuse. The five-year deadline for the achievement of the business plan has proved to be fitting in Wales. Monitoring is also necessary. The simplest way to address this is that the business plan provides a monitoring framework for each of its main elements.

Q3. For soundness purposes, are other modifications required to the policy and supporting text to ensure that together they are effective, unambiguous and clearly set out how a decision maker should react to such development proposals?

- The inclusion of Ecological Footprint Analysis (EFA) would provide both a benchmark and backstop for the policy, bringing objective as well as subjective analysis to proposals.