

10 November 2025



**Awdurdod
Parc Cenedlaethol
Arfordir Penfro**

Parc Llanion, Doc Penfro
Sir Benfro SA72 6DY

**Pembrokeshire Coast
National Park
Authority**

Llanion Park, Pembroke Dock
Pembrokeshire SA72 6DY

Ffôn/Tel:
01646 624800

Ffacs/Fax:
01646 689076

pcap@arfordirpenfro.org.uk
pcnp@pembrokeshirecoast.org.uk

www.arfordirpenfro.cymru
www.pembrokeshirecoast.wales

Mr. Mike Hedges
Chair, Legislation, Justice and Constitution Committee
Welsh Parliament

Dear Mr. Hedges,

Re: Planning Consolidation Bills

Thank you for your letter dated 21 October 2025 regarding the Planning (Wales) Bill and the Planning (Consequential Provisions) (Wales) Bill. I attach in Annex A comments from the Pembrokeshire Coast National Park Authority in relation to the three issues raised by Bannau Brycheiniog National Park Authority.

Yours sincerely,

Dr. Madeleine Havard
Chair
Pembrokeshire Coast National Park Authority



*Rydym yn croesawu cael
gohebiaeth yn Gymraeg, a
byddwn yn ateb gohebiaeth yn
Gymraeg. Ni fydd gohebu yn
Gymraeg yn arwain at oedi.*

*We welcome receiving
correspondence in Welsh, and will
respond to any correspondence in
Welsh. Corresponding in Welsh
will not lead to delay.*

Annex A: Comments from the Pembrokeshire Coast National Park Authority in relation to issues raised by Bannau Brycheiniog National Park Authority on the Planning (Wales) Bill and the Planning (Consequential Provisions) (Wales) Bill.

Summary of Issue 1 raised by Bannau Brycheiniog National Park

Authority: The Bill fundamentally changes the legal effect of Section 4A of the Town and Country Planning Act 1990 and the role of the National Park Authority as sole local planning authority for the area of the Park.

Comments from Pembrokeshire Coast National Park Authority: Section 7 'The planning authority of an area' identifies the National Park Authority as the Planning Authority for the area of the Park, except where a joint planning board is established under section 8 'Power to designate joint planning area and establish joint planning board'. Under section 9 'Joint planning areas and National Parks' a Joint Planning Board should not be set up to include a national park but that can be overridden by regulations.

There appears to be a subtly different approach in the Bill to the current section 2(1B) of the Town and Country Planning Act which contains an absolute prevention of a Joint Planning Board being established for a National Park in section 2(1D). The Pembrokeshire Coast National Park Authority would suggest that the wording in 2(1D) is retained to ensure this does not introduce a change through the Planning (Wales) Bill 2025.

Summary of Issue 2 raised by Bannau Brycheiniog National Park

Authority: Omission from consolidation of relevant provisions from The Conservation of Habitats and Species Regulations 2017.

Comments from Pembrokeshire Coast National Park Authority: It appears that Awdurdod Parc Cenedlaethol Bannau Brycheiniog are suggesting that the current requirement to prepare a local development plan in section 62 of the Planning and Compulsory Purchase Act 2004, must be read (as a result of regulation 41 of the Conservation of Habitats and Species Regulations 2017) so as to include policies encouraging the management of features of the landscape which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems of marking field boundaries) or their function as "stepping stones" (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species. It would appear that section 19 of the Planning (Wales) Bill does not make that clear, however, with appropriate amendment regulation 41 will still be applied. Our understanding is that the Conservation of Habitats and Species Regulations 2017 would continue to apply and that there is no requirement for a specific reference in the consolidation Bill (section 19), but would welcome clarity from Welsh Government's officers on this point.

Summary of Issue 3 raised by Bannau Brycheiniog National Park

Authority: Lack of clarity about the retrospective application of provision under s62(9) of the Planning and Compulsory Purchase Act 2004, when a local development plan ceases to be a local development plan on the expiry of the period specified in it (as is required to be included under section 62(3B)). The provision is repeated in section 19(9) of the Bill and should specify that it applies

only from the date of commencement of the Planning Wales Act 2015 and not retrospectively.

Comments from Pembrokeshire Coast National Park Authority: We would agree that section 19(9) of the Bill should specify it would only apply to Local Development Plans adopted after the date of commencement of the Planning Wales Act 2015 and not retrospectively to Local Development Plans adopted prior to this date.