

Appendix 1: Sustainability Appraisal Tool – Guidance Notes

Why a design tool?

As sustainable design becomes more and more important in the design and construction of buildings it is useful to be able to prompt and then predict the overall sustainability of each proposal. The design tool is designed to help achieve better quality buildings and spaces between them.

Additionally, this process will assist developers and designers to comply with Planning Policy.

The tool and the guidance have been structured in such a way as to support and inform the preparation of design statements.

What is a Design Statement?

A Design Statement is a method by which applicants and agents should be able to show how they have achieved good design in their development proposals. It should clearly demonstrate how the proposal fits the context of the site and its immediate surroundings and, if appropriate, to wider parts of towns and villages. This should include its relationship between buildings, streets, parks, waterways and landscape. It will also deal with choice of materials, detail and constructional form.

The design tool and your Planning Application

In accordance with planning Policy the Planning Authority must ensure that sustainable design has been taken into account in the design and construction of the built environment. See note below.

Using the tool

Applicants are required to demonstrate that issues of good sustainable design have been considered and are likely to be achieved. Careful completion each section of the relevant tool will assist in achieving this.

Structure: The scale, number and type of planning applications dealt with in the National Parks suggest that two different design tools are needed to deal with different scales of development. For example, some of the issues of importance for a new build infill development of two dwellings will not be applicable to an extension to an existing building. For this reason, the Design Tool has been organised in two versions.

Version 1 Tool: for extensions and conversions

This Design Tool will be used for applicants who intend to apply for planning permission to develop extensions or conversions to building envelopes up to 60m² total area.

Version 2 Tool: for proposals in excess of 60 m² new development

This is for proposals in excess of 60m² total area new development. This tool covers a wider range of sustainable design issues that apply to the scale of new build development applications experienced in the National Parks. The inclusion of more sustainable design measures in the tool will ensure that the proposal has addressed a broader range of issues that apply at this scale, where there are more impacts on surroundings, and greater challenges for integration of new buildings with the distinctive National Park environments.

NOTE:

It is important to note that at this stage of the development of the tool we are asking consultees to prioritise the design tool questions on a scale of importance of 1-3. This will help us in preparing a final version of the tool for use by individual National Parks, which it is intended should incorporate a scoring system.

Tool for EXTENSIONS and CONVERSIONS for developments under 60m2

Ref 7.6

Design Statement

1 Has the proposal included a design statement?

Minimum Requirement: short written statement setting out the design principles adopted, with accompanying illustrative material in plan and elevation, section and 3D

Good practice: illustrated design statement

Ref 7.6

Recognised Design Input

2 Has there been consultation with regards to how the design fits within its context in terms of physical, historical and cultural aspects?

Minimum Requirement: Pre-application design consultation with Local Authority

Good practice: Consultation with evidence of implementing recommendations in final application design

Ref 7.3

Energy Conservation

3 How has the extension or conversion conserved fuel and power usage?

Minimum Requirement: If the building has an energy requirement then an energy Statement must be provided and SAP rating for the proposal produced by a qualified SAP assessor

Good practice: SAP rating displaying evidence of improvements on 2006 Building Regulations Part L

SAP is the Government's Standard Assessment Procedure for Energy Rating of Dwellings. SAP 2005 is adopted by government as part of the UK national methodology for calculation of the energy performance of buildings. It is used to demonstrate compliance for dwellings with Part L of the Building Regulations (England and Wales) and to provide energy ratings for dwellings.

For more information visit: <http://projects.bre.co.uk/sap2005/>

4 Has the proposed extension or conversion enabled the use of renewable technologies, either initially or at a later point?

Ref 7.5

Environment and Biodiversity

5 Will the extension or conversion contribute to the landscape, biodiversity, and historic setting of the area?

Minimum Requirement: Written Statement provided on how the scheme will accommodate protective species and landscape character of the area.

Good practice: provision to increase of more than one habitat/ species on site

Ref 7.6	Distinctiveness
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6	Has the extension or conversion been designed to use local materials? (sourced from within a 30 mile radius)
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Minimum Requirement: Design statement sets out the proportion of locally sourced materials to be used in the development, with the majority of materials for facing and decorative features to be locally sourced.

Good practice: Developer has also located local sources of bulk construction materials (aggregates, concrete pre cast elements, wood frames)

7	Does the extension or conversion suitably address potential electric light pollution issues?
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Ref 7.4	Materials
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8	Will the development make efficient use of materials?
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Minimum Requirement: Provide written statement for the use of materials and waste minimisation during construction

Good practice: As minimum, with recycled or reclaimed materials from on site to be used in the conversion or construction of the developments extension and / or its infrastructure

Ref 7.4	Resource Efficiency
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9	Will the development make efficient re-use of water?
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Minimum Requirement: Rainwater harvesting from roofs of extensions or converted buildings to enable residents to use water for gardening and external purposes AND / OR use of water efficient appliances

Good practice: As minimum, plus rainwater used in "greenwater" systems for toilet flushing and / or washing machines
OR "greywater" recycling systems installed either for the extension / conversion or for the existing building

Tool for proposals in excess of 60 M.sq. new development

Ref 7.3 Energy

Carbon Reduction

Has the proposal addressed siting and orientation

- Minimum: Building addresses orientation
- Good practice: Layout addresses orientation with homes facing within 45 degrees of due south, maximising use of free solar energy for room lighting and solar gain
- Best practice: As good practice PLUS incorporation of measures for cooling and daylight

How have the energy requirements for the development been addressed?

- Minimum: Energy Strategy Statement provided with SAP rating produced by qualified SAP assessor
- Good practice: Energy Statement provided with guidance from a qualified SAP assessor on how to improve on 2006 Building Regulations Part L
- Best practice: **Maximum BREEAM/EcoHomes Credits for Ene 1:** Carbon Reduction (see Ecohomes Guidance for the assessment requirements relating to internal lighting fittings, air conditioning, and method of energy provision)
Maximum BREEAM/Ecohomes Credits for Ene 2: Building Fabric (see Ecohomes Guidance for requirements for building element U-Value improvements)

For BREEAM Guidance http://www.breeam.org/pdf/EcoHomes2005Guidance_v1.pdf

OR Call The BREEAM Office on 01923 664462

Integration of Renewable Energy

- Is the development designed to enable the use of renewable technologies, either initially or at a later point?
- What % of total development energy demand will be produced from an on-site renewable scheme (e.g. wind, solar, hydro photovoltaic bank, CHP operating on biomass or waste)?

Minimum:	All buildings are designed to enable the retrofitting of integrated renewables or 10% of the development's energy needs are provided through renewable energy
Good practice:	> 10% of the predicted requirements of the development
Best practice:	More than 100% will be produced, with surplus being exported to the grid

	Building Quality Accreditation
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	Have the buildings in the development been assessed for their sustainability meeting BREEAM/Ecohomes 'Excellent'
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Ref 7.6

Place and Distinctiveness

Design Statement

Has the proposal included a design statement that covers recommended issues?

Minimum:	short written statement setting out the design principles adopted, with accompanying illustrative material in plan and elevation, section and 3D
Good practice:	illustrated design statement
Best practice:	as Good Practice, plus consultation with local planning officer

Recognised Design Input

Has there been consultation on appropriateness of the design in terms of scale, mass, form and materials ?

Minimum Requirement:	Pre-application design consultation with Local Planning Authority
Good practice:	Consultation with evidence of implementing recommendations in final application design
Best practice:	As Good PLUS Consultation with Design Commission for Wales

Design Principles

Have the following issues been addressed

- 1) landscape/townscape/setting
- 2) Natural Heritage
- 3) Scale, Mass and Form
- 4) Continuity and enclosure
- 5) Materiality and detail
- 6) Legibility and accessibility

Minimum:	Yes 1 - 3
Good practice:	Yes to 1-3 plus 2 additional issues

Best practice: Yes to all issues

Is the development designed to an appropriate density for the site location and accessibility? |

Ref 7.7

Long-Life

WLGA Is the proposal designed to be flexible and adaptable?

Minimum: Flexibility of dwellings for future needs highlighted in design statement and supported by accompanying illustrative material

Good practice: **Residential dwellings** built to Lifetime Homes standards

Best practice: As good practice plus a proportion of live/work units provided within the development

For more information on Lifetime Homes visit www.lifetimehomes.org.uk/

Waste and Recycling



Has the developer included appropriate waste and recycling facilities?

Note: BREEAM/Ecohomes Guidance sets out requirements for capacity and location of waste and recycling collection units

http://www.breeam.org/pdf/EcoHomes2005Guidance_v1.pdf

OR Call The BREEAM Office on 01923 664462

Minimum: Criteria to meet Maximum BREEAM/EcoHomes Credits in Indicator MAT 3 (2005)

Good practice: Maximum BREEAM/EcoHomes Credits PLUS external storage space for bio-degradable waste and communal composting

Best practice:

Resource Efficiency



Will existing buildings on site be re-used/ refurbished?



Will the development make efficient use of materials?

Minimum: Provide written statement for the use of materials and waste minimisation during construction

Good practice: As minimum, plus recycled or reclaimed materials from on site to be used in the conversion or construction of the developments extension and / or its infrastructure

Best practice: Pre existing buildings on site: As good practice but with some buildings on site to be reused, refurbished or adapted.
No pre-existing buildings on site: Best Practice not currently identified



Has the proposal made provision for efficient use of water?

Minimum: Rainwater harvesting from roofs of all dwellings to enable residents to use water for gardening and external purposes

Good practice: As minimum, plus rainwater used in “greenwater” systems for toilet flushing and / or washing machines

Best practice: As minimum, plus greywater recycling systems installed either in individual buildings or collectively for development AND / OR use of water efficient appliances

	Materials
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Does the proposals design use local materials?

Minimum: Design statement sets out the proportion of locally sourced materials to be used in the development

Good practice: As minimum, plus developer mainly using locally sourced materials for facing and decorative features

Best practice: As good, plus Developer has located local sources of bulk construction materials (aggregates, concrete pre cast elements, wood frames)

Has the developer provided an list of the materials and construction techniques to be used?

Minimum: List of materials and techniques provided (with samples if required)

Good practice: Do the materials and techniques to be used respond to the local context

Best practice: As Good, with materials and techniques linked to context appraisal of locality and to neighbouring buildings

Will the development contribute to the biodiversity of the area?

Minimum:	Written Statement provided on how the scheme will contribute to the biodiversity and landscape character of the area
Good practice:	Suitable landscaping scheme agreed with LPA; development will result in an increase in important or sensitive habitat identified in the local biodiversity action plan (LBAP), either by area or increased ecological value (as assessed by an ecologist) or support for a species identified in the Biodiversity Action Plan
Best practice:	Provision to increase of more than one habitat/ species on site

Does the development make appropriate use of SUDS techniques? (see National Parks Design Guidance for information on SUDS)

Minimum:	Developer justifies the non-use of SUDS techniques
Good practice:	Developer will use SUDS techniques to assist in containing rainfall from 1:100 year rain events
Best practice:	Developer will use SUDS techniques to assist in containing rainfall from at least 1:250 year events

Does the development protect or enhance trees and hedgerows?

Minimum:	Trees and hedgerows on the site protected unless Tree Survey (in accordance with BS5837) recommends their removal
Good practice:	Additional trees and/or hedgerows planted with appropriate native species
Best practice:	Not currently identified

Has the proposed development been designed to protect and enhance green corridors?

Minimum:	Designated green corridors protected and / or enhanced
Good practice:	“Stepping stone” habitats provided within the site to support travel routes and feeding grounds for animal species, whilst enabling establishment of wind blown and animal transported seed

Best practice: Continuous green corridors provided to enable the easy movement of plant and animal species between habitats

	Health and well-being
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Will the development provide adequate private open space for its residents?

Minimum: Meets the local planning authority's standards – may be provided communally

Good practice: Meets the local planning authority's standards – provided privately for each dwelling

Best practice: Exceeds the local planning authority's standards whilst being of acceptable density

Does the development properly address potential electric light pollution issues? |

Appendix 2

Sustainable design in the National Parks and Planning Policy

The guidance detailed in this document is intended to be complimentary to existing sustainable development guidance for the UK and Wales. The objectives of such guidance should be reflected in this SPG with the hierarchical objectives of sustainable development having to be realised at the local level in order to make a regional and national contribution to sustainable development.

In the most recent review of the National Parks in Wales, future vision was spelt out as follows:-
'The National Parks of Wales are landscapes of national importance that capture much of what is distinctive and special about rural Wales environmentally and culturally. They lie at the heart of the identity of rural Wales, both for the Welsh people and the wider world. They have huge potential to enrich the lives of people in Wales and further afield, and contribute importantly to the economy of the Nation. They are cultural landscapes, moulded by their communities over millennia, where the interaction of people and place is central to their character...'¹

The three parks and local distinctiveness

Whilst this commission to propose design guidance comes from the three parks in partnership, it must be recognised that, critically, the three parks are locally distinctive. 'They are uniquely different from one another in landscape character and culture and show enormous variety within their borders'.²

Distinctiveness is that quality that characterises place. This is a difficult concept; but one of the main threats to the National Parks is that this quality is lost or eroded over time. The Wales Spatial Plan noted,

'The look of Wales is becoming more uniform. Standard building types are often failing to reflect traditional local building styles – with a strong growth in bungalows and executive estates that have no connection to local materials or style. With quality of life a major factor for long-term prospects, Wales needs to stand out and not become bland.'³

Whilst not referring directly to the National Parks the objective that flows from this concern is to encourage better sustainable design initiatives and design that reflects local distinctiveness.

¹ Ibid pv

² Review of the National Park Authorities in Wales prepared for the Welsh Assembly Government Feb 2004 p 7

³ Ibid p33

Wales Spatial Plan

The role of the Wales Spatial Plan is:

- To ensure the Welsh Assembly Government and its partners and agents develop policy in ways which take account of the different challenges and opportunities in the different parts of Wales.
- To provide a basis and momentum for working together on a shared agenda locally, so that the different parts of Wales can establish their own distinctive approaches to meet the objectives set in the strategic plan, 'Wales: A better country' and the Assembly's Sustainable Development Scheme.

The headlines of the Wales Spatial Plan are:

1. Building Sustainable Communities
2. Promoting a sustainable economy
3. Valuing our environment
4. Achieving Sustainable Accessibility
5. Respecting distinctiveness

This document sets the context for local and community planning and, as such, places issues of sustainable design and development at the heart of those processes. Local Development Plans will need to have regard to the Wales Spatial plan and they should be linked to Community Strategies, local authority improvement planning and, management plans for National Parks and AONB's.

In essence, it means that decisions are taken with regard to their impact beyond the immediate sectoral or administrative boundaries; that there is co-ordination of investment and services through understanding the roles of and interactions between places; and that the core values of sustainable development are placed in everything that is done.⁴

Key issues in the Wales Spatial Plan for the National Parks in terms of this project are outlined below.

Valuing our Environment

The Plan acknowledges that the environment is a critical asset. 'Wales benefits from high quality landscapes, a wealth of archaeological sites and historic monuments and a rich biodiversity...' It also acknowledges the likely impact of climate change: 'CO₂ emissions from Wales are currently running at twice the level that our natural environment is able to absorb'.⁵

⁴ Welsh Assembly Government People, Places, Futures The Wales Spatial Plan Nov 2004 p 5

⁵ Ibid p 23

In the actions to be adopted, the National Parks are not specifically mentioned. However, there is a commitment to develop and consult on visions for the future of countryside and landscape zones in the context of integrated sustainable development.

Local Distinctiveness

Linked to environment, national identity and local distinctiveness are also major themes:

‘The look of Wales is becoming more uniform. Standard building types are often failing to reflect traditional local building styles – with a strong growth in bungalows and executive estates that have no connection to local materials or style. With quality of life a major factor for long-term prospects, Wales needs to stand out and not become bland.’⁶

Again, whilst not referring directly to the National Parks the objective that flows from this concern is to encourage better sustainable design initiatives and design that reflects local distinctiveness.

The importance of both these policy statements should not be underestimated in the context of building design in the National parks of Wales. The Wales Spatial Plan sets out visions for areas of Wales. They are not specific to the National Parks themselves but include them within general areas. For example, in the vision for North West Wales – Eryri a Môn is ‘A high quality natural and physical environment supporting a cultural and knowledge-based economy that will help the area to maintain its distinctive character, retain and attract back young people and sustain the Welsh language.’⁷

Keywords here are high quality physical environment, cultural economy and maintain distinctive character.

The Brecon Beacons National Park is contained within the area described as Central Wales in the Spatial Plan and here the vision is of ‘High-quality living and working in smaller-scale settlements set within a superb environment, providing dynamic models of rural sustainable development, moving all sectors to higher value added activities.’⁸ Once more, environment is highlighted and linked to models of rural sustainable development.

In Pembrokeshire or The Haven the vision is of ‘Strong communities supported by a sustainable economy based on the area’s unique environment, maritime access and tourism opportunities.’⁹ Here, the Pembrokeshire national park is mentioned as an exemplar of sustainability.

⁶ Ibid p33

⁷ Ibid p 38

⁸ Ibid p 45

⁹ Ibid p 57

Planning Policy Wales

Published in the spring of 2002 Planning Policy Wales (PPW) sets out the context for sustainable land use planning policy, within which local authorities' statutory Unitary Development Plans are prepared and development control decisions on individual applications and appeals are taken.¹⁰ Supplemented by a series of Technical Advice Notes, the document identifies climate protection and preparing for the effects of climate change as key issues and clearly states a national commitment to sustainable development through its strategic policies.

It states, amongst other things that, in Planning for Sustainability, planning policies and proposals should:

- Promote resource-efficient settlement patterns minimising land-take
- Minimise the demand for travel, especially by car
- Reduce emissions of greenhouse gases through energy-efficient development and the use of energy from renewable resources
- Contribute to the protection and improvement of the environment. It stresses the promotion of the conservation and enhancement of statutorily designated areas such as the National Parks
- Ensure the conservation of the historic environments and cultural heritage, acknowledging and fostering local diversity
- Minimise the use of non-renewable resources, and where it is judged necessary to use them, maximise efficiencies in their use. The use of renewable resources and of sustainably-produced materials from local sources should also be encouraged¹¹

A priority in PPW is to strengthen communities. In rural areas priorities are given to communities complemented by sustainable tourism and an attractive, ecologically rich and accessible countryside. Statutory Landscape Designations apply to the National Parks in Wales and PPW confirms the statutory purposes of the Parks in terms of conservation and enhancement of their natural beauty, wildlife and cultural heritage.¹²

Climate Change: Cabinet Written Statement

Notwithstanding Planning Policy Wales, published in 2002 the issue of climate change has been further addressed by Welsh Assembly Government. In the Cabinet Written Statement of 14th December 2006; Planning for Climate Change, the Welsh Assembly Government announced its new consultation package making clear its commitment to reducing greenhouse gas emissions

¹⁰ Planning Policy Wales Welsh Assembly Government 2002 ISBN 0 7504 2854 6

¹¹ Ibid pps 12-14

¹² Ibid pps 51,52

and response to climate change. It acknowledges that, 'Current planning policy (Planning Policy Wales (2002) and Mineral Planning Policy Wales (MPPW), and associated Technical Advice Notes (TANs))... need to be reviewed and improved if we are to meet the increasing challenges of climate change in 2007 and beyond.'

Amendments to the policy are included in a Draft Ministerial Interim Planning Policy Statement (MIPPS) on Climate Change which 'introduces a new approach to planning advice on how to implement the new policy using a draft Climate Change Compendium.'

Appendix 3

Policy Mapping

The main headings or principles of sustainable development and design in this document have been matched and cross referenced against policy in the following table. The initials in the Key Policy Issues column relate to the headings in the Wales Spatial Plan – eg. VE is Valuing Environment, RD Respecting Distinctiveness etc.

Theme (and parent policy documents)	Key Policy Issues
	WLGA reference
Energy	VE
Planning Policy Wales TAN 5 TAN 6 TAN 8 TAN 12 TAN 15 TAN 21 Creating Sustainable Places (WDA) Sustainable Development Action Plan Starting to construct differently – Constructing Excellence in Wales (WDA) A Model Design Guide for Wales – residential development The Welsh Housing Quality Standard (WDA) Design Guide (WDA) Energy Wales (WAG) Better Homes Wales (WAG) Water Resource Strategy (Environment Agency Wales) Site Waste Management Plans (best practice DT1 ¹³) Development Quality Requirements – Design Standards and guidance July 2005 (WAG) Note also forthcoming ODPM Code for Sustainable Homes ¹⁴	Climate change Energy Design Passive design Renewable energy Resource Efficiency

¹³ The “Clean Neighbourhoods and Environment Bill” Act (enacted April 2005), provides the Secretary of State and WAG with powers to make regulations to require developers and contractors to produce a written site waste management plan for construction and demolition projects. A voluntary code of practice for developers and contractors promoting Site Waste Management Plans for all construction projects is already in place, but regulations are expected in 2007 which will make these compulsory for developments over a particular threshold. It is expected that these will be brought in jointly for England and Wales..

Materials and resources. Resource Efficiency	VE4
Planning Policy Wales TAN 5 TAN 6 TAN 8 TAN 12 TAN 15 TAN 21 Creating Sustainable Places (WDA) Sustainable Development Action Plan Starting to construct differently – Constructing Excellence in Wales (WDA) A Model Design Guide for Wales – residential development The Welsh Housing Quality Standard (WDA) Design Guide (WDA) Energy Wales (WAG) Better Homes Wales (WAG) A Model Design Guide for Wales – residential development Water Resource Strategy (Environment Agency Wales) Waste Management Plans (best practice DTI ¹⁵) Development Quality Requirements – Design Standards and guidance July 2005 (WAG)	Site choice – land as a resource Density Re-use of existing buildings and developed land Use of local materials Re-use, recycling and waste management (during and after building) Innovative construction methods (eg. MMC) Water availability and efficiency ALSO: PSE2, RD2
Environment and biodiversity	VE
Planning Policy Wales People, Places, Futures - Wales Spatial Plan TAN 18: TAN 12: TAN 4: A Model Design Guide for Wales – Residential development Design Guide (WDA) Creating Sustainable Places (WDA)	Appropriate location of site Biodiversity Landscape Green Corridors Natural heritage Trees and hedgerows Open space

¹⁴ The Code is currently intended to apply to publicly funded housing in England only. However the UK Government intends that it should show the future directions of Building Regulations, and that it should have a marketing function for developers wishing to promote the sustainability of their houses, so it may have some overlap in Wales. It is based on the existing Ecohomes standard.)

¹⁵ The “Clean Neighbourhoods and Environment Bill” Act (enacted April 2005), provides the Secretary of State and WAG with powers to make regulations to require developers and contractors to produce a written site waste management plan for construction and demolition projects. A voluntary code of practice for developers and contractors promoting Site Waste Management Plans for all construction projects is already in place, but regulations are expected in 2007 which will make these compulsory for developments over a particular threshold. It is expected that these will be brought in jointly for England and Wales.

<p>Accessibility Planning (Department for Transport)</p> <p>Food and Well-Being: reducing inequalities through a nutrition strategy for Wales (Food Standards Agency & WAG)</p> <p>Making the Connections: Transport and Social Exclusion (Social Exclusion Unit)</p> <p>Sustainable Development Action Plan</p> <p>Road Safety Strategy for Wales</p> <p>Walking and Cycling Strategy for Wales</p>	<p>Air and Water quality</p> <p>Integrating conservation and development</p> <p>ALSO: ASA1, ASA2, ASA4, ASA5</p> <p>Supporting alternatives to the private car</p>
Place and Local distinctiveness	RD
	Respecting distinctiveness
<p>Planning Policy Wales</p> <p>TAN 12: Design TAN 4 Appendix B (Town Centre Management)</p> <p>Design Guide (WDA)</p> <p>A Model Design Guide for Wales – residential development</p> <p>CADW website</p>	<p>Design</p> <p>Siting</p> <p>Form</p> <p>Mass</p> <p>Grouping and enclosure</p> <p>Orientation</p> <p>Passive design</p> <p>Materials</p> <p>Form and detail</p> <p>Heritage</p>
Well Run	
Promoting A Sustainable Economy	
<p>Planning Policy Wales</p> <p>Wales: A Vibrant Economy (WAG)</p> <p>People, Places, Futures – The Wales Spatial Plan</p> <p>Entrepreneurship Action Plan (WDA)</p>	<p>Access to training and education</p> <p>Green economy</p>

<p>Rural Development Plan for Wales TAN 4 TAN 12 Creating Sustainable Places (WDA) A National Action Plan for a Bi-Lingual Wales Sustainable Development Action Plan A Model Design Guide for Wales – Residential Development (POSW) Building in Green (CCW) Low Impact Developments (CCW) Social Enterprise Strategy for Wales (WAG) Community Facilities and Activities Programme (WAG) Community Land Trusts and sustainable rural communities Achieving Our Potential: a tourism strategy for Wales Sustainable Tourism Framework (WTB)</p>	<p>Supporting Community Economies Tourism</p>