

Pembrokeshire Coast National Park Authority

Accessibility Assessment



Supplementary Planning Guidance
to the Local Development Plan for the
Pembrokeshire Coast National Park

Adopted 26th June 2013



**Parc Cenedlaethol
Arfordir Penfro**
**Pembrokeshire Coast
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1.0 Introduction

1.1 This Supplementary Planning Guidance (SPG) explains how the National Park Authority (NPA) will consider accessibility of certain proposals in countryside locations. Policy 7 of the Local Development Plan sets out the types of developments that may be permissible in countryside locations. These include the conversion of appropriate buildings to a range of uses and sensitive filling in or rounding off to isolated groups of dwellings. In assessing these particular proposals the policy advises that accessibility to the Centres identified within the Plan will be an important consideration. It is aimed at helping prospective planning applicants to make an application and sets out the information we will consider when assessing proposals.

1.2 It is important that we consider all applications in a clear and consistent manner. The information contained in this Supplementary Planning Guidance will assist applicants to see the means by which accessibility is assessed by the Authority and how, exceptionally, some types of development may be acceptable in non-accessible locations.

1.3 While only the policies in the development plan have special status in deciding planning applications (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise), Supplementary Planning Guidance may be taken into account as a material planning consideration.¹ In making decisions on matters that come before it, the Assembly Government and the Planning Inspectorate will give substantial weight to approved supplementary planning guidance which derives out of and has been prepared consistent with the approach set out in national policy on the preparation of Local Development Plans.² Put simply the requirements of the legislation mean that the following needs to be taken into account when considering a proposal:

- Whether the proposal meets the requirements of policies within the Development Plan; and
- Weigh up all the other planning considerations to see whether they outweigh the conclusion of the Development Plan.³

1.4 A report of consultations detailing how the Guidance was consulted upon is available to view on the Authority's website.⁴

¹ Paragraph 5.2, page 33, [Local Development Plans Wales, Policy on Preparation of Local Development Plans, Welsh Assembly Government, 2005](#)

² Paragraph 5.3, page 33, [Local Development Plans Wales, Policy on Preparation of Local Development Plans, Welsh Assembly Government, 2005](#)

³ Page 27 <http://www.wlga.gov.uk/publications-and-consultation-responses-imp/planning-handbook-a-guide-for-local-authority-members/>

⁴ [Pembrokeshire Coast National Park - SPG](#)

2.0 Background and Context

- 2.1 Policy 7 of the Local Development Plan sets out the types of developments that may be permissible in countryside locations. These include the conversion of appropriate buildings to a range of uses and sensitive filling in or rounding off to isolated groups of dwellings. In assessing these particular proposals the policy advises that accessibility to the Centres identified within the Plan will be an important consideration. This is to maximise opportunities for sustainable travel through walking, cycling and using public transport to reach a range of facilities and services that would normally be beneficial for the end-users of the proposed development.
- 2.2 Locating developments so as to minimise the demand for travel, especially by private car is one of the Key Policy Objectives of the Welsh Government (Planning Policy Wales, para 4.4.2). Whilst accepting that opportunities for reducing car use in rural areas is more limited than in urban areas, the Welsh Government's policy is to direct the majority of new development in settlements with good accessibility by non-car modes when compared to the rural area as a whole. (Planning Policy Wales, para 4.6.7).
- 2.3 In July 2010, the Welsh Government published a revised version of Technical Advice Note 6: Sustainable Communities. This recognises the crucial role the planning system has to play in supporting the delivery of sustainable rural communities with the key question for the planning authority, when determining planning applications being whether the proposed development enhances or decreases the sustainability of the community. (Technical Advice Note 6, paragraph 2.2.). For this reason, it is accepted that in some instances the particular type of development or other sustainable benefits it could bring may outweigh the need for it to be in an accessible location.
- 2.4 Such instances would normally be where, in line with Technical Advice Note 6, the development proposals are intended to meet local needs.

3.0 Assessing Accessibility

- 3.1 When assessing accessibility the Authority uses advice published by The Institute of Highways and Transportation Guidelines for Providing Journeys on Foot. This suggests that a target distance between the site and a range of facilities is between 300m and 600m and an acceptable distance for those same facilities is between 600m and 1000m.
- 3.2 Taking into consideration that the National Park is a rural area, the maximum distance advised above – ie. 1km, is the standard used by the Authority when assessing how accessible a site is. The assessment needs to ensure that the means of accessing facilities from the site can provide a realistic alternative to car borne travel. This means that walking and cycling routes have to be open, appropriate and safe for pedestrian or cycling use.
- 3.3 The measurement will be calculated as an actual distance along appropriate routes from the site to a reasonable point in the nearest Centre, where a range of facilities and services are available measured along the shortest route, including roads and footpaths.
- 3.4 A site will also be considered to be accessible if there is a train station or bus route within a kilometre walking distance of the site. All bus services in Pembrokeshire operate on a hail and ride basis which means that they can stop to drop off or pick up passengers at places other than at designated bus stops. The decision to stop is made at the driver's discretion providing it is safe to do so. In assessing the practicality of the bus as providing a realistic alternative to car travel, the route between the site and the bus route must be open, appropriate and safe for pedestrian use.
- 3.5 For developments which would depend on a bus service to access Centres, the frequency and times of the available bus services are also a key consideration. Pembrokeshire County Council Highways Authority has defined the frequency of bus routes into six categories (see Appendix 1). The minimum level of service considered necessary to be able to have a reasonable degree of mobility without private transport is where there are services at times suitable for travel to and from work, schools, morning and afternoon shopping - generally a minimum of 5 return journeys a day.
- 3.6 This “strategic” level of service is therefore used as the minimum required to provide a realistic alternative to car travel for permanent residential accommodation.
- 3.7 When considering holiday letting proposals, the Authority would accept a less frequent service, as the travelling needs of holiday-makers differ to those of permanent residents. A bus service within 1km offering at least 3 return journeys per day would generally offer an acceptable alternative to car travel.
- 3.8 For conversions, infilling or rounding off proposals for other types of developments, the Authority would need to make an assessment of the likely travelling requirements of the users. This would determine whether accessibility by walking, cycling or public transport can provide a realistic alternative to car travel, and also if there are any other material considerations which may

outweigh the need for a proposed development to be located in an inaccessible location.

4.0 Exceptions

- 4.1 Technical Advice Note 6 (July 2010) advises that where development proposals are intended to meet local needs, planning authorities should recognise that a site may be acceptable even though it may not be accessible other than by the private car.
- 4.2 The following types of development are considered to be meeting a local need:
- i. **Affordable housing** - Planning Policy Wales, Edition 3, July 2010, paragraph 7.6.9 refers to affordable housing being for local need.⁵
 - ii. **Farm diversification** – Planning Policy Wales, Edition 4, February 2011, paragraph 7.3.3 refers to the need for local planning authorities to adopt a positive approach to development associated with farm diversification in rural areas, irrespective of whether farms are served by public transport.
 - iii. **Rural Enterprise⁶ Dwellings** – Technical Advice Note 6 (Sustainable Communities) paragraph 4.3.1 identifies that new isolated residential development in the countryside may be justified when accommodation is required to enable essential workers at rural enterprises to live at or close to their place of work.
- 4.3 The following developments may also be acceptable in principle, in non-accessible locations:
- a. Visitor attractions, recreational and leisure activities - where it can be demonstrated that the need for the proposal in that particular location outweighs the requirement for the site to be accessible by non-car modes (see policy 35d).
 - b. Conversion of buildings – where the historic or architectural merit of the building which can be preserved by the proposal outweighs the requirement for the site to be accessible by non-car modes. Where the proposal is for a residential use the Authority would apply the following hierarchical approach to considering applications:
 - The first consideration should be for the provision of affordable housing in line with TAN6;
 - Should it be proved that affordable housing is not viable, then the Authority would consider holiday letting proposals, where the travel requirements would be less demanding than those for permanent residential accommodation;
 - Permanent residential accommodation.

Traffic impact analysis and mitigation may be required in these instances. This may include the provision of a Travel Plan to demonstrate how the need to travel by car can be minimised. For example through use of school transport, internet shopping, car sharing etc.

⁵ A definition of a local person is contained in the Affordable Housing Supplementary Planning Guidance, adopted by PCNPA in March 2011).
<http://www.pembrokeshirecoast.org.uk/Files/Files/dev%20plans/AffordableHousingSpgAdoptedWorkingDraft.pdf>

⁶ Qualifying rural enterprises are defined in paragraph 4.3.2 of Technical Advice Note 6 as land-related businesses, including agriculture, forestry and other activities that obtain their primary inputs from the site, such as the processing of agricultural, forestry and mineral products together with land management activities and support services (including agricultural contracting), tourism and leisure enterprises.

5.0 Appendix A: Categorisation of Bus Service Frequencies

1. **Frequent** – services at least hourly, six days a week, including journeys suitable for travel to and from work, schools, morning and afternoon shopping.
2. **Strategic** – services at times suitable for travel to and from work, schools, morning and afternoon shopping, generally a minimum of 5 journeys a day – the minimum level considered necessary to be able to have a reasonable degree of mobility without private transport.
3. **Daily** – services on at least 5 days a week, but lacking one or more of the features necessary to be strategic.
4. **Infrequent** – services on one to four days a week.
5. **Very Infrequent** – services on school days only, summer only or less than weekly;
and
6. **No service at all.**

6.0 Appendix B: Check List

If	Then
The site is within 1km of a named Centre ⁷ identified in the Local Development Plan. (NB measure along actual roads and/or footpaths)	The site is considered to be accessible.
The site is more than 1km away from a Centre but is within 1km of a bus service.	<ol style="list-style-type: none"> 1. Check the destinations of the service; 2. Check the frequency of the service. 3. If no bus stop, check the general road conditions to see if would be generally safe for embarking/disembarking the bus.
The site is within 1km of a bus route with 5 or more return journeys a day.	Site is considered to be accessible.
The site is within 1km of a bus route with less than 5 return journeys a day.	The site may be accessible for holiday letting. Also appropriate for affordable housing.
The site is more than 1km away from a bus route.	The site is not accessible but may be acceptable in principle for affordable housing.
The site is more than 1km away from a bus route but the buildings have architectural or historic merit.	Weigh merits of buildings against non-accessibility and consider hierarchy for residential proposals: <ul style="list-style-type: none"> • Affordable housing • Holiday letting • Permanent residential use.
The application is a farm diversification proposal.	Site does not have to be accessible.
The application is for affordable housing.	Site does not have to be accessible.
Rural enterprise dwelling	Site does not have to be accessible.
Application for leisure/recreation/visitor attraction.	Consider evidence of need to be at that location and weigh merits against accessibility. Consider mitigation.

⁷ Tenby, Newport, Saundersfoot, St Davids, Amroth, Angle, Bosherton, Broad Haven, Dale, Dinas Cross, Felindre Farchog, Herbrandston, Jameston, Lawrenny, Little Haven, Manorbier, Manorbier Station, Marloes, Newgale, Pontfaen, Solva, St Ishmaels, Trefin, Cosheston, Hook, Houghton, Llangwm, Milton, New Hedges, Pleasant Valley, Roch, Square and Compass, Summerhill.

7.0 Appendix C: Useful Contacts

For further information please contact

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