

Priority D: Visitor economy, employment

D. Visitor Economy, Employment

Visitor Accommodation, Attractions, Leisure Activities and Recreation

- 4.152 The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance. This is best achieved in land use terms by not adding substantively to the overall provision of visitor accommodation, as this could encourage further 'peaking' and cause damage to the National Park landscape and special qualities, both in terms of the impacts of the additional development and increased activity in some 'hot spot' locations.
- 4.153 Instead, the future for the National Park in this Local Development Plan is one where by the end of the Plan period a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained to suit a range of pockets. Within the Local Development Plan's Centres upgrading is allowed so that more accommodation can be made suitable for the off peak season and the quality of the offer for the visitor is also improved. Hotels and guesthouses that can provide accommodation and employment all year round are safeguarded unless they are no longer viable. Some additional self catering is allowed to cater for all year round needs but this is restricted to instances where there isn't a priority to meet affordable housing needs.
- 4.154 Where new visitor related development (visitor attractions, recreational and leisure development and shore based facilities associated with off shore jetties etc.), is permitted it has been screened to avoid activities that would damage the special qualities the Park.¹²⁹ The development of a few all weather attractions has helped encourage more visits out of the peak season.
- 4.155 Traffic generation from visitor traffic is potentially a significant concern. A more rigorous approach to traffic impact assessment for such developments is required. Proposals that causing significant adverse impacts that cannot be mitigated are not permitted – see Policy 52 and Policy 53.
- 4.156 Supplementary Planning Guidance will be prepared to provide further advice on what would be inappropriate activities in the National Park.

¹²⁹ Inappropriate activities would be those that would damage the enjoyment of the special qualities of the National Park and this damage cannot be mitigated for example through zoning or traffic management measures or seasonally restricted activities.

Policy 35	<p>VISITOR ECONOMY (Strategy Policy)</p> <p>To attract visitors outside the peak season while ensuring that National Park environment is conserved and enhanced as a landscape of national and international importance by:</p> <ul style="list-style-type: none"> a) Not allowing any additional camping, caravanning or chalet pitches but allowing change over to other forms of self catering where the site lies within a Centre¹³⁰ and the scheme results in environmental benefits in terms of layout, design and materials used. (See Policy 38 and Policy 39) b) Protecting against the loss of hotels and guesthouses unless it is proven that their continued use would not be viable or that peak demand can continue to be met in the locality. (See Policy 36) c) Only permitting self catering accommodation on brownfield sites in the Local Development Plan's Centres and in conversions in the countryside except where an affordable housing need has been identified. Affordable housing provision will be given priority over self catering where such a need is identified.¹³¹ (See Policy 37) d) Permitting visitor attractions, recreational and leisure activities in the Local Service and Tourism Centre and the Local Centres. Proposals outside these Centres will need to demonstrate why a 'Rural Centre' or 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible. e) Directing shore based facilities¹³² to the developed stretches of coast where compatible with adjacent uses. (See Policy 17) <p>Activities which would damage the special qualities of the National Park will not be permitted. – see also Policy 8.</p>
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4.157 The policies below provide additional advice and guidance on the visitor economy.

Policy 36	<p>Loss of Hotels and Guest Houses</p> <p>Loss of hotels and guest-houses in the National Park will be permitted where:</p> <ul style="list-style-type: none"> a) the potential for continued use of the facility has been shown to be un-viable; or b) the overall demand for this type of accommodation during peak periods will continue to be met within the area; and c) there is no adverse effect on the appeal and intrinsic character of the resort, area or frontage.
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¹³⁰ See Glossary of Terms

¹³¹ Affordable housing in conversions in the countryside can be for local need. (paragraph 7.6.10 of Planning Policy Wales, Edition 3, July 2010)

¹³² Structures and buildings associated with the shore or harbour or mooring provision or associated with equipment beyond the mean low water mark.

- 4.158 This policy aims to protect the existing stock of hotels and guest houses in the National Park. A good supply and range of serviced accommodation is essential, particularly as tourism is a dominant factor in Pembrokeshire's economy. As the holiday market has changed there has been pressure to convert hotels and large guest houses to flats, apartments and private houses. Since 1990, there has been a loss of over 40 hotels within the National Park.
- 4.159 Hotels and guest houses often form part of the appeal and character of a town, village or area, which helps to attract visitors. In some instances, such as the Esplanade in Tenby, they form an intrinsic element of the identity of a particular frontage. Larger hotels also often form important landmarks in the townscape or landscape.
- 4.160 It is acknowledged that the demand for different types of holiday accommodation will continue to change and this is acknowledged in the policy which allows the change of use of those premises which are no longer viable and have no realistic prospect of becoming viable.
- 4.161 Any application to change the use must be accompanied by evidence to meet criterion a or b and c. Supplementary Planning Guidance on the loss of hotels will be prepared to provide further guidance on the application of this policy.¹³³

Policy 37	<p>Self-Catering Development</p> <p>Proposals for holiday cottages, flats and other forms of self-catering development will only be permitted where:</p> <p style="margin-left: 40px;">a) the proposal is on a brownfield site in a Centre¹³⁴ or is a conversion proposal in a countryside location (see Policy 7) or is the result of a changeover from camping/caravanning to self catering accommodation in Centres (see Policy 45), and</p> <p style="margin-left: 40px;">b) there is no need for affordable housing provision in the area or</p> <p style="margin-left: 40px;">c) the site or building is not appropriate for affordable housing provision.¹³⁵</p> <p>New build self-catering development on greenfield sites will not be permitted.</p>
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- 4.162 Self catering accommodation is defined as non-caravan self-catering accommodation including rented flats, cottages, houses, bungalows and chalets, the primary purpose of which is for holiday letting.
- 4.163 This category would also include hostels providing low-priced overnight accommodation with a large proportion of dormitory accommodation, self-catering and facilities related to outdoor activities or field study. Hostels providing catering services will be regarded as serviced accommodation.
- 4.164 Purpose built self-catering units may help to take the pressure off using local housing for holiday accommodation. However, a balance needs to be struck and given the large number of holiday

¹³³ Weblink for the supplementary planning guidance: www.pcnpa.org.uk/website/default.asp?SID=234&SkinID=5

¹³⁴ Please see Glossary of Terms

¹³⁵ Please note that the threshold for negotiating affordable housing provision is 2 or more residential units. Where a planning application is received for a site below the affordable housing threshold but which is part of a larger site which is above the threshold then the Authority will expect affordable housing to be provided. This is to ensure that sites are not broken up into smaller portions and phased which would avoid the requirement for affordable housing.

properties currently in the National Park the Authority will seek to prioritise the provision of affordable housing over self catering accommodation where such opportunities arise.

4.165 Planning conditions will ensure facilities remain as units of holiday accommodation and are not occupied as a sole or primary residence. Additionally, to reinforce the control over the occupancy of self-catering development, conditions will be imposed to ensure that the development is managed as a business enterprise rather than a second home.

4.166 This policy will be used to consider both new build and conversion to self-catering accommodation.

Policy 38	Camping, Touring Caravans, Statics and Chalet Sites New camping, caravanning, static caravan or chalet sites or the extension of existing sites either by an increase in the number of pitches or enlargement of the approved site area will not be permitted. Exceptionally, static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape.
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4.167 This policy seeks to control the further provision of caravan, camping and chalet sites.

4.168 The majority of caravan and camping sites in Pembrokeshire are concentrated within the National Park which occupies only 37% of the total land area of the County. The occupancy of pitches on static caravan sites within the National Park is also far greater than those outside the National Park.

4.169 Opportunities may arise to improve the quality of chalet site provision, through redesign, landscaping etc, without an increase in operational area or pitch numbers. The only exception to this will be where an enlargement to the site results in an overall environmental improvement. This might be achieved by reducing the overall density and allowing for additional landscaping, or moving pitches to less prominent locations so that the site better blends into its surroundings. In achieving environmental improvement by site enlargement, unrelated improvements such as providing additional facilities or upgrading caravan provision will not be expected. No increase in the number of pitches will be permitted in these circumstances.

Policy 39	Upgrading Statics, Touring Sites and Tent Pitches The upgrading of static caravan sites, touring caravan or tent pitches, to other forms of self-catering accommodation will be permitted, where: a) the site lies within a Centre; and b) the proposal forms part of a rationalisation scheme that will result in environmental benefits in terms of layout, design and materials used; and c) the proposal complies with Policy 35c).
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4.170 The intention of this policy is to accommodate improvements in the overall stock of holiday bed spaces so that more accommodation can be made suitable in the off peak season and the quality of the offer for the visitor has improved.

- 4.171 In order to ensure that development achieves genuine broad based benefits, the specified criteria require schemes to be both of a high standard and to be designed in such a manner that will enhance environmental standards. Development should reduce adverse landscape impacts and incorporate landscaping and parking works.
- 4.172 Within a centre means that the site is within the Centre boundary of those Centres listed in the Plan as local service and tourism centres, local centres and rural centres.

Policy 40	<p>Site Facilities on Tent, Chalet and Caravan Sites</p> <p>The development of retail and other facilities on tent, chalet and caravan sites will be permitted where:</p> <p>a) it can be demonstrated that the facility is not already available in the vicinity; and the scale and design of the facility is in keeping with the character of the surrounding area; and</p> <p>b) the vitality and viability of retailing and services of nearby Centres are not adversely affected.</p>
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- 4.173 It is accepted that chalet, caravan and tent sites generally require good quality washing and toilet facilities. In addition larger caravan and chalet sites may justify, for example, the provision of a camp shop, office, laundry facility or games room. Wherever possible such provision should be made by the adaptation or conversion of existing buildings although it is acknowledged that new buildings will be required in some instances. The provision of catering, leisure or shopping facilities on a scale that exceeds the reasonable requirements of the occupiers of the site or which relates poorly to the size, character or location of the site will not be encouraged. Facilities of a larger size and scale may be considered in circumstances where such facilities are lacking in the immediate locality. The transformation of sites into self contained holiday complexes providing extensive and inappropriate leisure or shopping facilities will be resisted. A balance must therefore be achieved between the need to maintain or improve the quality of facilities on site (having regard to site licensing requirements), and the need to safeguard existing facilities of nearby Centres.
- 4.174 On small sites in particular, the development of facilities in excess of those required by the licensing authority will be resisted. The provision of facilities under this policy will be expected to be accommodated within the confines of the existing site. In most instances, particularly in countryside locations, it will be appropriate to impose conditions on the grant of permission for such facilities to restrict their use to persons residing at the site. Such conditions will ensure that the scale of facilities remain appropriate for their intended purpose and will prevent undermining the vitality and viability of local facilities.

Policy 41	<p>Change of Use from Tent Pitches to Touring Caravan Pitches</p> <p>Changes of tent pitches that have a valid planning permission, or a lawful use, to "unit" pitches (tent, motor caravan and touring vans) will be permitted where:</p> <p>a) there is no increase in the number of pitches; and</p> <p>b) the approved site area is not enlarged; and</p> <p>c) an overall enhancement of appearance results; and</p> <p>d) at least one third of the total number of pitches remains exclusively for tents.</p>
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- 4.175 Policy 38 advises that planning permission will not be granted for the development of new caravan and tent sites in the National Park given the potentially damaging effect of further development on the landscape of the National Park, which is particularly vulnerable to such pressures. The National Park Authority also recognises, however, that visitors to the National Park have changed their preference from tents to touring caravans. To accommodate this change in demand the above policy allows a limited change-over on tent sites, where appropriate, whilst seeking to retain an element of tent provision. The local road network must be able to accommodate the amount and type of traffic generated, taking account of the specific requirements of touring caravans, without damaging the character of those roads, or the area through which they pass.
- 4.176 The differences between touring caravans and tents have become less apparent with the development of trailer tents and caravans with extended awnings. However, the change of use permitted by this policy will in many instances result in larger units being towed onto and parked on a site. Hence, access to and screening of the site will be material considerations in considering such changes of use.
- 4.177 This policy applies to those sites with the benefit of planning permission and those with a Certificate of Lawful Existing Use or an Established Use Certificate. '28 day rule' sites or sites operated by 'exempted organisations' are not considered appropriate for unit pitches. Such sites do not fall within the scope of this policy. In all such instances it will be a requirement that:
- 4.178 A condition preventing year-round occupancy is included on any permission granted; and additional land is not used under the 28-day rule for tent pitches. This will be secured either by legal agreement or obligation.

Employment

- 4.179 The strategy for employment generation is to make small scale provision in the Park to enhance the socio-economic well-being of Park communities and also to help tackle seasonality issues with employment in the area. Large scale proposals are not considered compatible with the National Park designation. Small scale employment development is seen as development involving less than 2 hectares of land for business, general industrial or storage and distribution.
- 4.180 To avoid significant trip generation the locations promoted are generally those where homes, shops and services are located or proposed to be located. Traffic impact assessment for development will be required. Proposals that cause significant adverse impacts that cannot be mitigated will not be permitted – see Policy 52.
- 4.181 At the end of the Local Development Plan period it is envisaged that small scale employment sites have been unlocked and are being developed in some of the larger centres in the Park. Employment uses have also been generated outside these areas, and in some instances employment has come forward as part of a live/work unit. Many sites that have been in employment use for some time are still available for new users. Each working harbour in the National Park continues to contribute positively both to employment in and the character of the area.
- 4.182 A sequential approach to land release has been adopted to maximise the use of previously developed land. The employment/mixed use allocations include an estimated 28% provision on previously developed land.

Policy 42 **EMPLOYMENT SITES & LIVE/WORK UNITS (Strategy Policy)**

Employment opportunities will be provided and safeguarded through:

- a) Small scale employment opportunities are identified at St Davids.
- b) Directing small-scale employment proposals to appropriate locations in the Local Development Plan's identified Centres or buildings suitable for conversion in the Countryside (See Policy 7d). Farm diversification can also assist. (See Policy 7c)
- c) Combining business uses with other uses such as community facilities or housing including live/work units. Sites are identified at Newport and St Davids. There are also mixed use developments proposed at Tenby, Saundersfoot and Broad Haven. Employment and mixed allocations listed in Table 3 below are shown on the Proposals Map.
- d) Protecting existing employment sites for employment use except in locations where the current use is not suited to the area or there is adequate provision already or the existing use is unviable. When considering a new use for a redundant employment site a community facility or affordable housing provision will be given priority. (See Policy 43)
- e) Protecting and enhancing the working harbours at Tenby, Saundersfoot, Solva and Porthgain. (See Policy 18)

Table 3 Allocations of Employment/Mixed Use Sites (See Proposals Map and Appendix 2)

Location/ Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected	Proposed Use
Tenby MA706	Upper Park Road, Tenby	0.01	4	60	2	Mixed (Residential & Retail)
Tenby MA707	White Lion St/Deer Park, Tenby	0.49	74	60	44	Mixed (Residential, Retail, Hotel and Cinema)
Tenby MA710	Sergeants Lane, Tenby	0.09	5	60	3	Mixed (Residential, Workshops & Retail)
Newport MA232	Land adjacent to the Business Park, Feidr Pen y Bont	0.79	6	Live/Work Units	0	Mixed (Live/Work Units)
Saundersfoot MA777	Rear of Cambrian Hotel, Saundersfoot	0.30	37	(current approval for 7 affordable/ renewal 60%)	7	Mixed (Residential, Retail & A3 Pub)
St David's EA748	South of St Davids Assemblies	0.93	0	0	0	Employment B1, B8, Local Waste Management Facility

Location/ Proposals Map ID	Site Name	Area Hectare	Residential Units	% Affordable Units	Affordable Housing Provision expected	Proposed Use
St David's MA746	Between Glasfryn Road and Millard Park, St Davids	0.74	5	Live/Work Units	0	Mixed (Live/Work Units)
Broad Haven MA776	Land at Broad Haven north east of Marine Road	2.29	35	37	13	Mixed (Residential, Workshops & Community Facility)
Manorbier Station MA895	Land part of Buttylands, Manorbier Station	0.59	15	50	8	Mixed (Residential/ Education)
St Ishmael's MA733	Adjacent to School, St Ishmaels	2.39	40	50	20	Mixed (Residential/ Education)
		8.62	221		97	

4.183 Planning Policy Wales sets out clear statements of national development control policy on employment developments in rural areas. Please refer to Chapter 7 'Supporting the Economy'.

4.184 The following policy and advice provide additional guidance on protecting employment sites.

Policy 43	<p>Protection of Employment Sites and Buildings</p> <p>Permission to redevelop, or use, business, general industrial, storage or distribution sites or buildings for other purposes will be permitted where:</p> <p>a) the present use is inappropriate for the locality; or</p> <p>b) there is adequate alternative provision in the vicinity; or</p> <p>c) the potential for continued use of the site or premises has been shown to be unviable.</p> <p>Where the loss of the employment site is justified a community use or affordable housing provision will be given priority where such a need exists.</p>
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4.185 The aim of this policy is to prevent the inappropriate loss of existing employment sites and buildings to other uses, unless there are overriding benefits that can be attributed to the new development or there is adequate alternative availability elsewhere in the locality. 'Employment sites and buildings' means sites and buildings (whether currently in use or unoccupied) with planning permission, lawful use or allocated for employment purposes. In the National Park there is limited appropriate land to accommodate business developments. It is particularly important to protect existing sites such as former garage sites for reuse for employment undertakings and prevent redevelopment for other purposes. The feasibility of retaining existing uses should include offering the site or premises for sale on the open market for at least one year at a realistic price. In criterion a) the present use will be judged in terms of compatibility of the nature and scale of the use within the local area and its impact on the local road network. In criterion b) the assessment of adequate alternative provision in the vicinity will consider the capacity of existing uses, availability of vacant premises and employment sites and allocations.

Key Actions outside the Local Development Plan

- 4.186 Centres that include employment allocations are highly likely to need public funding to help unlock sites through the Department of Economy and Transport at the Welsh Assembly Government and Pembrokeshire County Council. Please see Appendix 2 for further advice.