

## Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan Deposit Version December 2009

### Appendix E: Detailed Appraisal of mutually exclusive policy options appraised for the Local Development Plan Preferred Strategy

This appendix contains the detailed policy option appraisal matrices for the sets of mutually exclusive policy options considered for the Preferred Strategy of the Local Development Plan (the Policy Options included in Appendix D).

<b>Policy 1: TENBY LOCAL SERVICE AND TOURISM CENTRE (TIER 2); Policy 2: NEWPORT LOCAL CENTRE (TIER 3); Policy 3: SAUNDERSFOOT LOCAL CENTRE (TIER 3); Policy 4: ST DAVIDS LOCAL CENTRE (TIER 3); Policy 5: RURAL CENTRES (TIER 4); Policy 6: COUNTRYSIDE (TIER 5)</b>				
Option exclusivity: 70 or 72	Option 70: Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy.		Option 72: Continue with the current Joint Unitary Development Plan approach.	
<b>SA Objective</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Placing some pressure on using agricultural land but may lead to financial contributions to the farming community.	+/-	Placing some pressure on using agricultural land but may lead to financial contributions to the farming community.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	The locations chosen are likely to be more accessible.	-	Some locations for development would not be as accessible as the first option.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including	+	Working within environmental capacity.	+	Working within environmental capacity.

the built environment and archaeology) with reference to the special qualities of the National Park				
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.	0	Protection of the National Park is likely to ensure no decrease but unlikely to secure an increase.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	See 2 above and working with environmental capacity.	+/-	See 2 above and working within environmental capacity.
7. Reduce factors contributing to climate change.	+	See above	+/-	See above.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	This strategy is more focused on delivering prioritised needs.	+	Some prioritising taking place.
9. Encourage access for all to the National Park, reflecting the social mix	+/-	Greater emphasis on delivery affordable housing but this may be at 'the expense' of	+/-	See across but to a lesser extent.

of society.		meeting demands for all.		
10. Maintain the cultural distinctiveness of communities.	++	The strategy is quite tailored to the uniqueness of individual centres.	+	The strategy is supportive of allowing development commensurate with the character of the villages and towns but not quite as tailored as that first option.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	-	Inevitably development will lead to the use of minerals.	-	Inevitably development will lead to the use of minerals.
12. Reduce the negative impacts of waste.	-	Waste will be generated	-	Waste will be generated.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+/-	The strategy seeks to direct development to locations with some facilities and so should support them. It would not direct development to locations with extremely limited facilities.	+/-	The strategy could direct development to locations with no facilities and away from villages and towns with. However it could support locations with an extremely limited number of facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Working within environmental capacity.	+	Working within environmental capacity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Working within environmental capacity	+	Working within environmental capacity.

<b>Overall assessment and suggested changes</b>	<b>+</b>	<b>Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.</b>	<b>+/-</b>	<b>Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.</b>
<b>Recommendation</b>	<b>This first option contributes more to the sustainability objectives.</b>			

<b>Policy 6: COUNTRYSIDE (TIER 5)</b>						
<b>d). Conversion of buildings in the countryside</b>						
Option exclusivity: 30 or 31 or 32	Option 30: Allow conversion of buildings in the 'Countryside' where contributing to the character of the area to housing including affordable housing, farm shops, employment related uses where there is accessibility to the main towns and villages. Also allow self catering if in the Tenby Tourism Growth area. <sup>1</sup>		Option 31: Allow conversion of buildings in the 'Countryside' where contributing to the character of the area to housing including affordable housing, farm shops, employment related uses including self catering accommodation. <sup>2</sup>		Option 32: Retain the existing Joint Unitary Development Plan option which only allows residential development including affordable housing provision where opportunities to secure employment related activities including self catering accommodation have been explored. <sup>3</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry	-	If buildings are not suitable for full residential use, their	++	Gives full scope for farms to utilise redundant	++	Gives good scope for farms to utilise redundant buildings to diversify the

<sup>1</sup> This would allow a range of uses except in specific circumstances for self catering. Residential uses can be demanding on the fabric of buildings. Limiting the distance from services should make reuse a more sustainable option.

<sup>2</sup> This would reflect the old Local Plan approach.

<sup>3</sup> This would be more in keeping with Planning Policy Wales. This would be a less sustainable option in terms of accessibility and would not take account of the level of existing self catering accommodation provision.

sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.		use within the farm business for self catering holidays would not be permitted outside the Tenby TGA, restricting an opportunity to diversify the farm business, though other employment related uses may still be possible. Possibly may restrict any employment use for farms in more isolated areas		buildings to diversify the business. Diversification into self catering is likely to encourage more appropriate management for landscape and biodiversity (make the farm more attractive to visitors)		business. Diversification into self catering is likely to encourage more appropriate management for landscape and biodiversity (make the farm more attractive to visitors). Though it is more difficult to change use to full residential and realise the value of buildings through sale, this course is unlikely to represent a long term sustainable business option (farm will at some stage run out of buildings to sell).
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	The requirement for accessibility to towns and villages may reduce the need for travel by car, if the employment related use requires employees from the wider community.	-	Lack of restriction as to how buildings can be used would encourage car travel, to housing and employment in remote places. There is no requirement for the buildings to be in an accessible location.	-	Could encourage car travel to employment sites in remote places.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	++	Will help secure the future of valuable buildings in the countryside by allowing appropriate reuse  Provided that conversions are appropriate in terms of scale, form and materials Agree	++	Will help secure the future of valuable buildings in the countryside by allowing appropriate reuse  Provided that conversions are appropriate in terms of scale, form and materials. Agree	+	Will help secure the future of valuable buildings in the countryside by allowing reuse. Though perhaps not as effectively as the other two options as the potential uses are more restricted, and there is not consideration of the contribution to the character of the area.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and	--/+	Would result in more tourism accommodation in places with walking/cycling opportunities 'straight out of the front door' but only in	+	Would result in more tourism accommodation in places with walking/cycling opportunities 'straight out of the front door'	+	Would result in more tourism accommodation in places with walking/cycling opportunities 'straight out of the front door'

cycling) and volunteering opportunities.		the Tenby Tourism Growth area. Negative for the majority of the National Park.				
5. Increase the number of visitors using the National Park outside the peak visitor season.	--/+?	More availability of self catering may encourage additional visitor numbers outside the peak visitor season but only in the Tenby Tourism Growth Area.	+	More availability of self catering may encourage additional visitor numbers outside the peak visitor season.	+	More availability of self catering may encourage additional visitor numbers outside the peak visitor season.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	See 2 above	-	See 2 above	-	See 2 above.
7. Reduce factors contributing to climate change.	-/+	See note on car use. Self catering accommodation represents an energy using building that is not housing a full time household (i.e. is extra housing to heat and light beyond the basic housing needs of the population)  SPG covering sustainable development should help to ensure that buildings are as energy efficient as possible – possible use as ‘role models’. At least with a conversion the planning authority can impose conditions to make it energy	-/+	See note on car use. Self catering accommodation represents an energy using building that is not housing a full time household (i.e. is extra housing to heat and light beyond the basic housing needs of the population)  See comments for option 35. It also is making use of an existing resource rather than new build.	-/+	See note on car use. Self catering accommodation represents an energy using building that is not housing a full time household (i.e. is extra housing to heat and light beyond the basic housing needs of the population)  See comments for option 35. It also is making use of an existing resource rather than new build.

		<p>efficient. It also is making use of an existing resource rather than new build.</p> <p>See comment elsewhere about the dangers of modern energy requirements relating to traditional buildings. Importantly, these buildings have embodied energy and are culturally distinct, part of the overall landscape</p> <p>Tongue in cheek – surely holiday home users offset any energy savings in their carbon footprint getting here and the fact that they run 1.5 homes!!</p>				
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+/-	<p>Allows for a range of uses including affordable housing. Full residential use could mean a house is used as a second home. Restricts the use that buildings can be put to but as the main restriction is on self catering which is least likely to meet community needs this option could be viewed as positive with regard to this Sustainability Objective.</p>	+/-	<p>The lack of restriction on use means that buildings can be used to meet community needs. Conversely buildings can also be used for uses that do not reflect community need.</p>	--	<p>In most areas the main needs of the community is for affordable housing. This option is the most difficult for securing that kind of use.</p>
9. Encourage access for all to the National Park, reflecting the social mix	+	<p>This option asks for the reuse to be in locations that will be accessible which</p>	-	<p>This option does not ask for the buildings to be in an accessible location.</p>	-	<p>This option does not ask for the buildings to be in an accessible location.</p>

of society.		would be more socially inclusive.				
10. Maintain the cultural distinctiveness of communities.	0	Conversion of buildings is a manifestation of the changing character of communities in that it reflects a change in function and therefore activity in the community. It is more likely that the change in culture causes the change in building function than the other way round. Yes	0	Conversion of buildings is a manifestation of the changing character of communities in that it reflects a change in function and therefore activity in the community. It is more likely that the change in culture causes the change in building function than the other way round.	--	See note for the other options and also this option most favours holiday let reuse, shifting communities to a holiday culture
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0	Though converted building might otherwise have been a source of reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National Park. Yes – and there are reasons not to reuse buildings for salvage as set out in other papers	0	Though converted building might otherwise have been a source of reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National Park.	0	Though converted building might otherwise have been a source of reclaimed building materials it is unlikely that the scale of this resource will make a difference to the demand for minerals from the National Park.
12. Reduce the negative impacts of waste.	-	Waste will be generated. The sustainable design policy of the Plan to address.	-	Waste will be generated. The sustainable design policy of the Plan to address.	-	Waste will be generated. The sustainable design policy of the Plan to address.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the	0	Unlikely to be relevant as community facilities will be settlement based.	+0	Unlikely to be relevant as community facilities will be settlement based.	0	Unlikely to be relevant as community facilities will be settlement based.



National Park population						
14. Maintain and enhance biodiversity both within and outside designated sites	+	Conversion can lead to enhancement of biodiversity.	+	See across	+	See across.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0		0	
<b>Overall assessment and suggested changes</b>	<b>+</b>	<b>There may be some boundary issues with the Tenby TGA. It is defined as a radius of 6 miles around Tenby, resulting in a (possibly intentional) fuzzy area Not allowing self catering outside Tenby TGA may preclude such a use where full residential use is inappropriate in any case.</b>	<b>+</b>	<b>Include reference to the need for proposals in remote locations to ensure there is no adverse traffic impact. See proposed new policy option under transport.</b>  <b>Prioritising re-use for affordable housing where there is a need would help maximise the contribution of limited opportunities to sustain communities. Recognise that in some instances holiday letting may be preferable to full residential because full residential may be more demanding on the fabric of the building.</b>	<b>-</b>	<b>This option will make it difficult to secure affordable housing.</b>  <b>Lack of reference to landscape character means that conversions could be potentially detrimental to NP special qualities. This would however be considered as part of a suite of generic policy considerations.</b>
<b>Recommendation</b>	<b>The second option is preferable subject to the amendments proposed.</b>					

<b>Paragraph 4.57. Ministry of Defence</b>				
Option exclusivity: 88 or 89	Option 88: Allow limited operational development on the ranges subject to mitigation measures and only allow proposals for significant intensification or alteration of use or extensions to sites where they have been subject to the most rigorous examination and only permitted in exceptional circumstances (the major development test – see Scale and Location of Growth Section). <sup>4</sup>		Option 89: Allow limited operational development on the ranges and proposals for significant intensification of use on the ranges subject to mitigation measures being put in place. Extension proposals to be subject to the major development test. <sup>5</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Proposals may be sited on good quality agricultural farmland and not be suitable or the purchase of farmland could bring money into the farming community.	+/-	Proposals may be sited on good quality agricultural farmland and not be suitable or the purchase of farmland could bring money into the farming community.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-	There will be trip generation but the appraisal process would need to consider the implications of traffic generation.	--	A more lenient approach may make the Park a less attractive area to live and visit and therefore reduce travel.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with	+	A more rigorous examination is likely to ensure that this objective is achieved.	-	A more lenient approach could result in an adverse impact.

<sup>4</sup> This is the approach set out in the Joint Unitary Development Plan.

<sup>5</sup> This would be inconsistent with the major development test in national planning policy.

reference to the special qualities of the National Park				
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	A more rigorous investigation of issues is likely to ensure there isn't a negative impact. It is unlikely to cause a positive impact.	-	A more lenient approach could result in an adverse impact.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	A more rigorous investigation of issues is likely to ensure there isn't a negative impact. It is unlikely to cause a positive impact.	-	A more lenient approach could result in an adverse impact.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	A more rigorous approach is likely to ensure this is achieved.	-	A more lenient approach could result in an adverse impact.
7. Reduce factors contributing to climate change.	+	A more rigorous approach is likely to ensure this is achieved.	-	A more lenient approach could result in an adverse impact.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	Sites are remote from local communities.	0	Sites are remote from local communities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	A more rigorous approach would ensure a proper assessment of impacts and the potential for increased access to MOD developments in any new proposal.	-	. A more lenient approach may reduce access opportunities.

10. Maintain the cultural distinctiveness of communities.	+	A more rigorous approach would ensure a proper assessment of impacts.	-	A more lenient may cause damage.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	-	Likely to use minerals in development.	-	Likely to use minerals in development.
12. Reduce the negative impacts of waste.	-	Likely to use minerals in development.	-	Likely to use minerals in development.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0	
14. Maintain and enhance biodiversity both within and outside designated sites	+	A more rigorous examination of the development would be undertaken and protection is more likely	-	A more lenient may cause damage.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	A more rigorous examination of the development would be undertaken and protection is more likely	-	A more lenient may cause damage.

<b>Overall assessment and suggested changes</b>	<b>+</b>	<b>Negative impacts in terms of the development itself are inevitable but these could seek to be addressed through the Sustainable Design policies and transport policies of the Plan.  This option contributes more to the sustainability objectives.</b>	<b>-</b>	<b>Negative impacts in terms of the development itself are inevitable but these could seek to be addressed through the Sustainable Design policies and transport policies of the Plan.</b>
<b>Recommendation</b>	<b>Choose Option 88 as it is more likely to achieve the sustainability objectives.</b>			

<b>Policy 9: SCALE OF GROWTH</b>				
Option exclusivity: 108 or 109	Option 108: To continue the National Park Authority's current approach of providing for development to meet the needs of the local population where this is possible within the Park's environmental capacity. <sup>6</sup>		Option 109: To seek to achieve Welsh Assembly projections for the area on a pro-rata basis with other Planning Authorities in the South West Wales area. <sup>7</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Less likely to place pressure on agricultural land or could lead to financial contributions to the farming community.	--/++	See across but to a greater extent.

<sup>6</sup> Using recent housing development rates as a proxy – 80 residential units per annum - this is likely to mean that the Authority will not be able to provide for housing development levels commensurate with Welsh Assembly Government population projections when shared on a pro-rata basis. It may however assist other planning authorities in the South West Wales area who wish to pursue a more optimistic growth rate. The Authority continues to achieve its statutory purposes, the National Park landscape is protected which also has economic benefits for the area. Lack of capacity may affect the socio-economic well-being and survival of communities.

<sup>7</sup> This is likely to mean needing to achieve statistical targets over the Plan period of 113 dwellings per year (circa 1,700) over the Plan period. Given the Plan area's inability to provide for such a level of development historically this is highly likely to be environmentally damaging.

2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-	There will still be car journeys generated.	--	More likely to increase in the number of car journeys.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	++	Directly related to achieving this sustainability objective.	-	Likely to undermine.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	Likely to ensure the National Park remains an attractive place to visit. Unlikely to lead to an increase in visitors.	-	May lead to a decrease if the Park becomes a less attractive place to visit.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	See above.	-	See above.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+/-	See above for 2. Working with environmental capacity means biodiversity will be protected and flooding avoided.	--	See above for 2 and more likely to place pressure on biodiversity and development leading to the risk of flooding.
7. Reduce factors	+/-	See above	--	See above.

contributing to climate change.				
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+?	Policy option is to aim to meet the needs of local communities within environmental capacity but that capacity will curtail the Authority's ability to do so.	-	Doesn't recognise that there are limited opportunities and that projected needs can be met.
9. Encourage access for all to the National Park, reflecting the social mix of society.	-	All demands cannot be met and therefore there isn't access for all.	+	More likely to cater for all demands.
10. Maintain the cultural distinctiveness of communities.	+	Providing for local people can enhance local distinctiveness where this is fundamental to the community	+/-	Depends on whether the change can enhance or dilute. If new development resulted in additional second homes this could dilute whereas if they were safeguarded for affordable housing then this could potentially enhance.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	-	Inevitably development uses minerals.	--	More development = more minerals used
12. Reduce the negative impacts of waste.	-	Waste will be generated	--	More waste will be generated.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the	+/-	Providing for the local population is more likely to be supportive of local facilities but less development may mean less money generated through planning contributions.	+/-	If new development becomes second homes then this can be negative but it could release greater financial contributions towards community facilities.

National Park population				
14. Maintain and enhance biodiversity both within and outside designated sites	+	Working within environmental capacity	-	Likely to lead to greater pressure for release.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Working within environmental capacity	-	Likely to lead to greater pressure on this resource.
<b>Overall assessment and suggested changes</b>	<b>+/-</b>	<b>Development will result in some negative impact. Agricultural land loss would be tested against national planning policy. The minerals, waste and transport sections look at ways of negating negative impact. The Scale and Location of Growth section looks at directing development to the most sustainable location. Limiting opportunities and not providing for all will raise social inclusion issues. This inevitable given the National Park's statutory purposes.</b>	<b>-</b>	<b>Development will result in some negative impact. Agricultural land loss would be tested against national planning policy. The minerals, waste and transport sections look at ways of negating negative impact. The Scale and Location of Growth section looks at directing development to the most sustainable location. This approach is more likely to have adverse impacts on the National Park landscape, culture, biodiversity and its attraction as a tourist destination. The limited land available will potentially be 'wasted' rather than used for priority needs.</b>
<b>Recommendation</b>	<b>The first option is preferred.</b>			

<b>Policy 15: Local Waste Management Facilities</b>		
Option exclusivity: 136 or 137	Option 136: The National Park accommodates regional waste facilities. <sup>8</sup>	Option 137: Should the National Park Accommodate local community waste facilities? <sup>9</sup>

<sup>8</sup> The National Parks of Wales are waste planning authorities, but have no waste collection or disposal responsibility. Regional groups have been established in Wales to bring forward Regional Waste Plans. The Regional Waste Plan will not allocate sites for facilities, but it will indicate areas of need and search for potential sites for future facilities, and where possible, a choice of locations that once agreed in the due local political process and in recognition of existing Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan Deposit Version December 2009, Appendix E: Detailed Appraisal of mutually exclusive policy options appraised for the Local Development Plan Preferred Strategy



SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0		0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special	-	The development of regional waste facilities, receiving and processing waste from the South West Wales area could make a significant impact on landscape	+	Local, small scale waste recycling schemes can be more readily accommodated within or near to settlements, and are less likely to impact on landscape or townscapes.

contractual arrangements, would serve the region. The work towards identifying areas of search is continuing within the South West Wales Regional Waste Group. Technical Advice Note 21 'Waste' emphasises the importance of close liaison between the National Parks and local waste management authorities to ensure that there is an agreed, co-ordinated approach to waste planning that can be implemented in the National Park Local Development Plan. The waste management requirements of the National Park should form part of the relevant regional waste plans. Technical Advice Note 21 advises that planning policy and development control in National Parks and Areas of Outstanding Natural Beauty should continue to give due weight to the pursuit of National Park purposes and enhanced protection and management of Areas of Outstanding Natural Beauty in terms of landscape and scenic beauty. Regional technical groups should have regard to these priorities in preparing the waste management options in regional waste assessments.

<sup>9</sup> Local, small scale community based schemes, such as civic amenity and recycling centres at the Salterns, Tenby and at St Davids are already located within the National Park. Typically they include recycling bins for a range of materials, bulk storage bins (for landfill). There are also a network of community based bring sites. These can comprise paper and can banks for example

qualities of the National Park				
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0		0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0		0	
7. Reduce factors contributing to climate change.	+ / -	The provision of waste recycling and re-use facilities would assist in reducing the use of virgin material the making of which contributes to climate change. The road transport of such material however to the National Park, would increase transport movement to a peripheral location, when more central locations would generate shorter transport distances. Waste movement by sea may well reduce road transport movements	+	The provision of local waste recycling and re-use facilities would assist in reducing the use of virgin material which is usually high energy and contributes to climate change.
8. Maximise the contribution of the limited opportunities for development to	0		+	The provision of local waste recycling facilities would provide services to the local community, enhancing their sustainability.

sustaining local communities.				
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0	
10. Maintain the cultural distinctiveness of communities.	0		0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0	
12. Reduce the negative impacts of waste.	++	The introduction of regional waste facilities would implement this objective	++	The introduction of local waste facilities would implement this objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0	
14. Maintain and enhance biodiversity both within and outside designated sites	0		0	
15. Promote sustainable use of, and maintain and enhance the quality of,	0		0	

inland and coastal waters.				
<b>Overall assessment and suggested changes</b>	<b>+/-</b>	<b>Whilst a contribution to regional waste facilities would help to reduce contributions to climate change, and the negative effects of waste. This needs to be balanced against the landscape sensitivity of the National Park and its peripheral location in particular.</b>	<b>+</b>	<b>Local waste facilities would help to reduce the negative impacts of waste, and would have less of an impact on landscape and townscape. It could also have the benefit of contributing towards sustainable local communities.</b>
<b>Recommendation</b>	<b>Choose option 137 as the best fit to sustainable objectives.</b>			

<b>Policy 17: SUSTAINABLE DESIGN</b>					
Option exclusivity: 114a; 115 or 116 or 117 or New Option	Option 114a In all new buildings (excluding householder applications and extensions) a minimum CO2 emission reduction figure of 25% below current building regulation baseline will be required	Option 115: Require all new dwellings and other new buildings to achieve BREEAM/EcoHomes "Excellent" rating <sup>10</sup>	Option 116: Set energy and resource standards for particular types of development <sup>11</sup>	Option 117: Leave Building Regulations to deal with energy and other resource standards, intervening only in the case of stricter energy targets for larger scale schemes <sup>12</sup>	New Option: Leave the WAG standards to prevail plus add specific requirements for the more strategic development sites in the National Park and a minimum of solar thermal panels within all new buildings where there is a need to provide hot water for users.

<sup>10</sup> These are nationally recognised, well established certification schemes facilitated by skilled assessors, providing an independent measure of the overall sustainability of a development

<sup>11</sup> This approach would not require applicants to obtain independent certification of their schemes, but would place greater onus on the Authority in assessing whether sufficient provision has been made

<sup>12</sup> This approach would not enable early progress to be achieved in raising energy standards in most development in the National Park  
Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan Deposit Version December 2009, Appendix E: Detailed Appraisal of mutually exclusive policy options appraised for the Local Development Plan Preferred Strategy

SA Objective	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0		0		0		0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0		0		0		0		0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	0		0?+	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc values of traditional buildings and townscapes, and could contribute to their further enrichment.	0?+	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc values of traditional buildings and townscapes, and could contribute to their further enrichment.	0?+	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc values of traditional buildings and townscapes, and could contribute to their further enrichment.	0?+	Resource efficient buildings, if sensitively designed, need not conflict with aesthetic, etc values of traditional buildings and townscapes, and could contribute to their further enrichment.
4. Increase the number of residents and visitors taking part in physical forms of recreation	0		0		0		0		0	

(especially walking and cycling) and volunteering opportunities.										
5. Increase the number of visitors using the National Park outside the peak visitor season.	0		0		0		0		0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0		++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage. This option is likely to	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage.	+	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically or environmentally cost free. Improved energy efficiency will reduce the need for energy. Present Building Regulation requirements lag behind best practice levels of energy and other	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically or environmentally cost free. Improved energy and other resource efficiency will reduce the need for energy and water use and promote more sustainable drainage.

				realise the greatest efficiency gains				resource efficiency.		
7. Reduce factors contributing to climate change.	++	Domestic energy use is a major contributor of CO <sub>2</sub> . This will substantially reduce that in new dwellings	++	Would achieve greater reduction in Carbon emissions than required by legislation, to nationally recognised standards	++	Carbon emissions reductions would depend on the standards set but would not be below building regs / WAG standards and would offer scope for achieving significant improvements.	+	Would achieve Carbon emissions reductions but only to the lowest acceptable standards.	++	Would achieve reduction in Carbon emissions to nationally recognised standards
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	-?	May result in increased cost for homes, though this would be recouped in reduced running costs	-?	This would have cost implications which may make it more difficult for local people to take advantage of development opportunities, though these may be largely offset by grants and subsequent	+	Would allow different standards to be set so that sustainability standards in excess of National requirements would not prevent otherwise desirable projects benefiting local	0	Would make no difference to the ability of local people to develop as these standards would apply whatever the policy for the NP	-?	This would have cost implications which may make it more difficult for local people to take advantage of development opportunities (though not as great as option 115), though these may be largely offset by grants and

				savings		communities.				subsequent savings
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0		0		0		0	
10. Maintain the cultural distinctiveness of communities.	0		0		0		0		0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0		0		0		0	
12. Reduce the negative impacts of waste.			++	Waste reduction and management are integral parts of the nationally accreditation schemes	++	Standards could be set under this option for waste reduction and management	0	Approach would not advance on existing building regulation standards	++	Waste reduction and management are integral parts of the nationally accreditation schemes
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0		0		0		0	
14. Maintain and enhance biodiversity	+	Addressing the causes of	0		0		0		0	



both within and outside designated sites		climate change is likely to be of net benefit to biodiversity globally.								
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		++	Would achieve greater improvement in efficiency of water and sewerage use than required by legislation, to nationally recognised standards	++	Will depend on the nature of the standards set but would not be below building regs / WAG standards, and would offer scope for achieving significant improvements	+	Would achieve more efficient use of water and sewerage but only to the lowest acceptable standards.	++	Would achieve improvement in efficiency of water and sewerage use to nationally recognised standards
Overall assessment and suggested changes	++	<b>Will help reduce the factors contributing to climate change. Any increase in build costs are likely to be offset by reduced running costs for the completed building</b>	++	<b>Potential for a very positive contribution to meeting SA objectives.</b>	++	<b>Potential for a very positive contribution to meeting SA objectives.</b>	+	<b>A positive contribution to meeting SA objectives, but potentially lower than in the more proactive alternative options.</b>	++	<b>The WAG standards are likely to be comparable with the BREEAM 'Very Good' Standard (CfSH Level 3, this has been assumed for the Sustainability Appraisal). Though not as exacting as</b>

										the BREEAM 'Excellent' rating it will provide significant sustainability benefits in line with National standards
<b>Recommendation</b>	<b>Preferred options: Choose the new option as it offers independent, widely accepted, National, high standards and has fewer resource implications for this authority than 116.</b>									

<b>Policy 17: SUSTAINABLE DESIGN</b>				
Option exclusivity: 118 or 119	Option 118: Where appropriate require energy efficiency improvements in the original building as well as in the extension, etc for which permission has been sought. <sup>13</sup>		Option 119: Distribute energy awareness literature to applicants for extensions and other householder development. <sup>14</sup>	
<b>SA Objective</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0	
2. Decrease the length	0		0	

<sup>13</sup> This would significantly increase the ability of the Authority to promote energy efficiency improvements.

<sup>14</sup> This awareness building approach would be "softer", but it would be unlikely to achieve as much, in the short term at least.

and number of journeys made by private car to and within the National Park by both residents and visitors.				
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	0		0	
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0		0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	An indirect effect of climate change is the requirement for renewable energy sources, which are not socio-economically or environmentally cost free. Improved energy efficiency will reduce the need for energy. Extension of the option to cover water use and drainage would offer opportunity to impact on flood risk.	+?	This approach might promote but would not require action to improve household efficiency.

7. Reduce factors contributing to climate change.	++	Would achieve improved carbon performance than required by current legislation as it would affect the whole building not just the alteration.	+?	This approach might promote but would not require action to improve household efficiency.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	?	In an area of high housing prices many households will not be able to meet changing housing needs by moving house, and instead may need to alter their existing property. If the improvements required to the whole property are relatively cheap and repay rapidly (e.g. loft or cavity wall insulation) this option may not make much difference to the affordability of the alteration. More expensive improvements (e.g. new heating system or solar panels) could affect the affordability of schemes and may mean the household cannot address the change in its housing needs. In this context implementation of this option would need to be specific in the types of improvements and the circumstances in which they might be required (and when the rest of the building would be considered of sufficient standard not to require improvements).	0	
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0	
10. Maintain the cultural distinctiveness of communities.	0		0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential	0		0	

biodiversity and landscape gains of former minerals sites are realised.				
12. Reduce the negative impacts of waste.	0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0	
14. Maintain and enhance biodiversity both within and outside designated sites	0	Schemes would need to take full account of use of roof spaces, etc, by bats, birds, etc.	0	This would also provide an opportunity to highlight biodiversity dimensions of carrying out improvements within existing buildings.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	Unlike the options for and resource efficiency in new build this doesn't cover non-energy resource use. Should it be extended to cover water and drainage efficiency opportunities that might exist in some cases?	0	Opportunities might also usefully be taken to promote awareness of water and drainage efficiency, which are not presently reflected in the option.
<b>Overall assessment and suggested changes</b>	<b>++?</b>	<b>Would give gains relating to energy use and carbon footprint, but could also compromise the ability of households to meet changes in their housing needs. Such a policy approach would need to spell out the sorts of improvements involved and the circumstances in which they would be required. The opportunity should also be taken to address water use and drainage within the option.</b>	<b>0?+</b>	<b>This approach could also usefully address water use and drainage. However, we should also consider the monetary and environmental costs of producing literature unless there is already suitable 3<sup>rd</sup> party literature available.</b> <b>Would putting such literature in with energy and water bills be more effective - offer an opportunity to save, rather than spend, money.</b>
<b>Recommendation</b>	<b>First option preferred with the modifications above.</b>			

<b>Policy 21: RENEWABLE ENERGY</b>								
Option exclusivity: New Option or 105 or 106 or 107	New Option: A policy which sets out the manner which small scale, medium scale and larger scale proposals will be considered in light of the findings of the Renewable Energy Assessment. The policy also sets out parameters on how onshore connections will be considered.		Option 105: Encourage on site renewable energy development at an appropriate scale where community schemes have already been explored. <sup>15</sup>		Option 106: Encourage small scale community based renewable energy development, but retain tight control over the location and design of larger scale development <sup>16</sup>		Option 107: To contribute to the development of alternative energy sources through the marine environment <sup>17</sup>	
<b>SA Objective</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Small scale renewable schemes may contribute to farm incomes, either through the sale of energy or through generation of energy to be used in the business. Larger schemes	+	Appropriate renewable energy development to serve agricultural or forestry could increase viability whilst conserving landscape and biodiversity	+ / -	Large renewable energy schemes can provide a rental income to the agricultural community, they would not help to conserve or maintain the landscape.	0	

<sup>15</sup> Including renewable energy as an early consideration in development proposals would ensure that the potential for appropriate renewable energy is maximised at an early stage.

<sup>16</sup> This option would ensure that the landscape is a primary consideration in the siting of renewable energy development and is consistent with conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park. Community based schemes would benefit from economies of scale for investment, and avoid a proliferation of proposals.

<sup>17</sup> The marine environment off the Pembrokeshire Coast provides opportunities for renewable energy innovation, particularly for wave or tidal resources. This option will support research into alternative energy options. The Wave Dragon (Wales) Ltd is hoping to test a wave energy converter demonstration project off St Anne's Head. The testing is intended to take place for 3-5 years when it will be removed and the site decommissioned.

		could also create revenue in terms of site rents from the operator. Renewable energy will provide a market for forestry products though this may promote the planting of non-native trees, or forestry practices of limited value to the landscape or biodiversity						
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0		0		0		0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	?	The requirement to consider environmental impacts of schemes and consider the impact of large scale schemes on the Special Qualities of the National Park should protect the landscape. Where the scheme	+	Appropriately scaled and located renewable energy schemes need not conflict with the conservation and enhancement of landscapes, townscapes and seascapes.	+	Appropriately scaled and located renewable energy schemes need not conflict with the conservation and enhancement of landscapes, townscapes and seascapes.	-	Intrusive marine renewable energy developments could impact on the seascape and landscape

		involves biofuels there may be negative impacts due to crop monoculture, or the promotion of conifer forestry. Conversely renewable energy may provide a market for native wood products, and traditional woodland management. The policy has potential to allow development on undeveloped coast						
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0		0		0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0		0		0		0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the	+?	Climate change may result in fossil fuel energy becoming more	0		0		0	



effect on biodiversity; public health.		expensive, or restricted in availability by government policy, renewable energy schemes will be an important tool for addressing this. That said, as the demand for renewable energy increases, certain forms of renewable energy (e.g. biofuels) are also likely to increase in price.						
7. Reduce factors contributing to climate change.	+	Renewable energy encompasses technologies to meet energy needs without contributing to climate change. The policy allows such development as so will contribute to this Sustainability Objective. The largest schemes may be precluded as they are likely to compromise the Special Qualities of the National	++	Appropriate renewable energy schemes will make a significant contribution to the implementation of this objective	++	Appropriate renewable energy schemes will make a significant contribution to the implementation of this objective	++	Appropriate renewable energy schemes will make a significant contribution to the implementation of this objective

		Park.						
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Off grid community renewable energy schemes could benefit communities by providing a degree of energy security.	-?	Renewable energy schemes on an individual basis will do little to benefit the community as a whole	+	Community based schemes can help to generate community spirit and provide improved self sufficiency	+	Off shore schemes could benefit local communities through the provision of renewable energy
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0		0		0	
10. Maintain the cultural distinctiveness of communities.	+	Community based schemes could help to generate community unity and maintain distinctiveness	0		+	Community based schemes could help to generate community unity and maintain distinctiveness	0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0		0		0	
12. Reduce the negative impacts of waste.	0		0		0		0	
13. Community facilities (including health & social care facilities, social facilities and retail	0		0		0		0	

provision) continue to meet the needs of the National Park population								
14. Maintain and enhance biodiversity both within and outside designated sites	+/-	Opportunities to enhance biodiversity may arise from schemes where access is restricted and disturbance minimised. There is also potential for schemes, such as hydro power to negatively impact on ecology.	+ / -	Opportunities to enhance biodiversity may arise from schemes where access is restricted and disturbance minimised. There is also potential for schemes, such as hydro power to negatively impact on ecology.	+ / -	Opportunities to enhance biodiversity may arise from schemes where access is restricted and disturbance minimised. There is also potential for schemes, such as hydro power to negatively impact on ecology.	+ / -	Disturbance to marine environment may be possible with some schemes.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0		0		0	
Overall assessment and suggested changes	+	This option has been appraised in light of the Policy drafted for the Deposit Local Development Plan. Renewable energy schemes are for the most part likely to contribute significantly to a more sustainable society. In a	+	Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of factors contributing to climate change.	+	Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of factors contributing to climate change.	+?	Marine renewable energy can contribute to the sustainability objective on the contribution to climate change, the potential for effects on the marine environment should form part of this option.

		<p>National Park the impact of any renewable energy scheme on the landscape and other Special Qualities of the National Park must be a consideration, and therefore this policy makes less likely the large scale developments that might generate significant amounts of renewable energy. This policy represents the tension between being sustainable in the sense of reducing carbon footprints, and being sustainable in the sense of protecting for future generations those areas regarded as special due to their high quality landscape. As such it attempts to strike an appropriate</p>						
--	--	--	--	--	--	--	--	--

		balance.					
<b>Recommendation</b>	<b>The new option, and the policy developed from it, is preferred</b>						

<b>Policy 23a): VISITOR ECONOMY</b>				
Option exclusivity: 52 or 53	Option 52: To allow the conversion of static and touring caravan or tent pitches to other forms of self-catering accommodation where the site lies within a settlement and the proposal forms part of a rationalisation scheme that would result in environmental benefits in terms of layout, design and materials used.		Option 53: Conversion of static and touring caravan or tent pitches to other forms of self-catering accommodation will not be permitted.	
<b>SA Objective</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0		0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with	++	This policy option seeks to enhance the landscape by allowing upgrading of pitches, provided numbers of units are rationalised and environmental benefits result. This would include impact on the landscape. The option would allow for such developments only within settlements where there would be an	++	This option seeks to protect the landscape by resisting the development of more permanent structures. This is particularly pertinent in areas outside settlements.

reference to the special qualities of the National Park		opportunity to use design to allow the buildings be in character with surrounding buildings.		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	++	This option would allow conversion of some caravan or camping pitches to more permanent accommodation which is likely to be more appropriate for year-round use.	-	This would not change the status quo.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	-	Camping and caravanning sites are frequently green field sites. Upgrading to more permanent accommodation is likely to increase hard surfaces and therefore affect the rate of surface run-off. Without attenuation this may have an impact on flooding in some cases.	+	This would retain the status quo.
7. Reduce factors contributing to climate change.	-	If the resulting development would need concrete/ cement.	+	This would retain the status quo.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Upgrading to more permanent accommodation, particularly in settlements is likely to allow it to be used for a longer period of the year and there is therefore potential for visitors to help sustain local facilities and services for a longer period.	-	This retains the status quo.
9. Encourage access for all to the National Park, reflecting the social mix	+	May allow some of the surplus caravan and camping sites to be used for alternative visitor accommodation and therefore increase	-	Retains the status quo, accepting that there is a surplus provision in this sector.

of society.		provision of self-catering accommodation.		
10. Maintain the cultural distinctiveness of communities.	+	This option provides an opportunity to use design to allow buildings be in character with surrounding buildings.	-/+	This retains the status quo.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0	
12. Reduce the negative impacts of waste.	0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0	
14. Maintain and enhance biodiversity both within and outside designated sites	-	This is likely to impact on biodiversity as temporary structures are replaced with permanent structures.	-/+	This maintains the status quo.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0	
Overall assessment and suggested changes	+	<b>Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better</b>	<b>+/-</b>	<b>Would realise landscape benefits by preventing the creation of permanent structures, but would not help remove unsightly caravans from the landscape.</b>

		<b>opportunities for year round tourism.</b>		
<b>Recommendation</b>	<b>Policy Option 52 preferred to Policy Option 53.</b>			

<b>Policy 23b): VISITOR ECONOMY</b>								
Option exclusivity: 47 or 48 or 49 or 50	Option 47: Protect against loss of all hotels and guest houses		Option 48: Protect against loss of hotels and guesthouses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality.		Option 49: Protect against the loss of hotels and guesthouses in the Tenby Tourism Growth area.		Option 50: Allow conversion of hotels and guesthouses. <sup>18</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0							
2. Decrease the length and number	0							

<sup>18</sup> This approach would allow the market to dictate the supply of serviced accommodation provision. With house prices being so high there is a risk that even hotels with a viable future would be lost to housing use. This would have wider implications for resorts and even smaller settlements in the National Park where scope for new facilities is extremely



of journeys made by private car to and within the National Park by both residents and visitors.								
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	-/+	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve the townscape provided that the buildings are retained. There is a danger, however of damage to the townscape where the use is no longer viable and the buildings become dilapidated as a result.	++	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve the townscape provided that the buildings are retained. Those with an unviable future would be redeveloped or reused thus also protecting the townscape.	-/+	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve the townscape provided that the buildings are retained. There is a danger, however of damage to the townscape where the use is no longer viable and the buildings become dilapidated as a result. Outside the Tenby Tourism Growth Area the loss of serviced accommodation premises could negatively impact on townscapes.	-	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. Loss of facilities may negatively impact on townscapes in some instances.
4. Increase the number of residents and visitors taking part in physical forms	0		0		0		0	

of recreation (especially walking and cycling) and volunteering opportunities.								
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Good quality serviced accommodation is acknowledged to be best placed to provide for year-round visitor accommodation. This option protects all serviced accommodation and therefore has the potential to assist with this criterion. It does not, however, discriminate in terms of quality.	++	Good quality serviced accommodation is acknowledged to be best placed to provide for year-round visitor accommodation. This option protects all serviced accommodation and therefore has the potential to assist with this criterion. Unlike the previous option this one protects serviced accommodation with a viable future which is more likely to be of a good quality.	+	This option protects against loss of serviced accommodation only in a limited area of the National Park and therefore the effects of such an approach would also be limited. This option does not discriminate in terms of quality.	-	It is likely that some proposals arising from the conversion of hotels and guest houses would be for other visitor accommodation, such as self-catering properties. This would be only a proportion, however and therefore there would be greater potential to loose visitor accommodation to uses such as residential.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0		0		0		0	
7. Reduce factors	0		0		0		0	

contributing to climate change.								
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities.	++	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities.	+	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities. This would apply only in a limited area of the National Park.	-	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities. Losses of these facilities and employment opportunities may result through this policy option.
9. Encourage access for all to the National Park, reflecting the	+	Has the potential to ensure accommodation is provided for a	+	Has the potential to ensure accommodation is provided for a range of budgets.	+	Has the potential to ensure accommodation is provided for a range of budgets within a	-	May result in a loss of lower graded accommodation.

social mix of society.		range of budgets.				limited area.		
10. Maintain the cultural distinctiveness of communities.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve that culture.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve that culture.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve that culture within the most affected area.	-	Loss of serviced accommodation could have a negative impact on the cultural distinctiveness of some communities, particularly the resorts of Tenby and Saundersfoot.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0		0		0	
12. Reduce the negative impacts of waste.	0		0		0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet	0		0		0		0	

the needs of the National Park population								
14. Maintain and enhance biodiversity both within and outside designated sites	-/+	Maintains the status quo.	-/+	Loss of some buildings may affect certain species, but appropriate policies would ensure they are provided for in new developments.	-/+	Loss of some buildings may affect certain species, but appropriate policies would ensure they are provided for in new developments.	-/+	Loss of some buildings may affect certain species, but appropriate policies would ensure they are provided for in new developments.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0		0		0	
<b>Overall assessment and suggested changes</b>	-	<b>May result in damage to townscapes through deterioration of important buildings when the current use is no longer viable</b>	+	<b>Option least likely to result in the loss of serviced accommodation, with attendant negative effects</b>	-	<b>More likely to result in loss of serviced accommodation, with attendant effects than option 48</b>	--	<b>Could result in extensive loss of serviced accommodation with negative effects on settlement character and employment</b>
<b>Recommendation</b>	<b>Preferred option: 48</b>							

<b>Policy 23c): VISITOR ECONOMY</b>										
Option exclusivity: 54 or 55 or 56 or 56a or 57	Option 54: Outside the Tenby Tourism Growth Area do not permit any further self catering accommodation in the National Park.		Option 55: Do not permit any further self catering accommodation in the National Park.		Option 56: Allow self catering in conversions in the countryside and on brownfield sites in defined centres <sup>19</sup>		Option 56a: Allow self catering accommodation on brownfield sites in the plan's Centres and in conversions in the countryside except where an affordable housing need has been identified. In these instances affordable housing provision will be given priority.		Option 57: Allow self catering in conversions in the countryside	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.										
2. Decrease the length and number of journeys made by private car to and within the										

<sup>19</sup> Tier1 and Tier2 Centres – see Scale and Location of Growth Section

National Park by both residents and visitors.										
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	++	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. This option	++	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. This option	++	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. Developable land in the National Park is scarce and development of further purpose-built self catering	++	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. Developable land in the National Park is scarce and development of further purpose-built self catering accommodation will reduce the supply further. This allows limited	++	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. Developable

		limits the potential for further such development to tourism growth area only thereby minimising demand on the land-take and hence limiting impact on the landscape.		limits the potential for further such development to tourism growth area only thereby minimising demand on the land-take and hence limiting impact on the landscape.		accommodation will reduce the supply further. This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or delapidated buildings or sites.		new self-catering developments through development of windfall sites which would help to enhance derelict or delapidated buildings or sites.		land in the National Park is scarce and development of further purpose-built self catering accommodation will reduce the supply further. This allows limited new self-catering developments and help to bring has the potential to enhance derelict or delapidated buildings.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0		0				0	
5. Increase the number of visitors using the National Park outside the peak visitor	+	This allows further self-catering development within a	-	There are a significant number of residential properties in	++	This policy allows for some development of self-catering properties using	+	This policy allows for some development of self-catering properties using	++	This policy allows for some development of self-



season.		limited area where tourism is being encouraged. As existing dwellings can be used for self-catering letting purposes it is likely that demand outside this area would not be curtailed.		the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector.		windfall sites and is likely to allow for a greater increase purpose-built letting properties.		windfall sites and may allow for a greater increase purpose-built letting properties.		catering properties using windfall sites and is likely to allow for a greater increase purpose-built letting properties.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public	-/+	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute	-/+	As developable land in the National Park is limited, there is every likelihood that land not used for this	++	As this option uses brownfield land it is likely to minimise the risk of flooding and impact on biodiversity, although appropriate	++	As this option uses brownfield land it is likely to minimise the risk of flooding and impact on biodiversity, although appropriate	++	As this option uses brownfield land it is likely to minimise the risk of flooding and impact on

health.		to these potential effects of climate change.		purpose would be developed for another purpose.		policies will ensure the appropriate approaches are taken, eg. protection of species in derelict buildings.		policies will ensure the appropriate approaches are taken, eg. protection of species in derelict buildings.		biodiversity, although appropriate policies will ensure the appropriate approaches are taken, eg. protection of species in derelict buildings.
7. Reduce factors contributing to climate change.	-	If the resulting development would need concrete/ cement.	-/+	This would retain the status quo.	-	If the resulting development would need concrete/ cement.	-	If the resulting development would need concrete/ cement.	-	If the resulting development would need concrete/ cement.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	An increase in these facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops but for a limited area only.	+	This retains the status quo.	++	An increase in these facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops.	++	An increase in visitor facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops. Where the need for housing is more important this will be given priority.	++	An increase in these facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops.

9. Encourage access for all to the National Park, reflecting the social mix of society.	+	Allows greater provision of self-catering accommodation but only in a limited area of the National Park.	+	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector without new build additions.	++	Allows greater provision of self-catering accommodation.	+	May allow greater provision of self-catering accommodation.	++	Allows greater provision of self-catering accommodation.
---	---	--	---	---	----	--	---	---	----	--

<p>10. Maintain the cultural distinctiveness of communities.</p>	<p>+</p>	<p>Self-catering accommodation is a growing sector of the visitor accommodation market. Many houses in the National Park are now used for holiday letting. An over-supply can impact negatively on the culture of communities where houses remain empty for parts of the year. This option has a proactive approach to increasing provision only in the tourism growth area.</p>	<p>-/+</p>	<p>Self-catering accommodation is a growing sector of the visitor accommodation market. Many houses in the National Park are now used for holiday letting. An over-supply can impact negatively on the culture of communities where houses remain empty for parts of the year. Lack of new provision may mean more of the existing properties are used for this purpose, although land available for development will not be required for purpose-built</p>	<p>-/+</p>	<p>This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or delapidated buildings or sites. This may result in a negative effect if iconic buildings are removed, but has the potential to allow redevelopments to add to the cultural distinctiveness of a community with careful design. Buildings in the countryside are usually redundant agricultural buildings and so their use for self-catering accommodation would result in a distinct change to the local</p>	<p>+</p>	<p>This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or delapidated buildings or sites. This may result in a negative effect if iconic buildings are removed, but has the potential to allow redevelopments to add to the cultural distinctiveness of a community with careful design. Buildings in the countryside are usually redundant agricultural buildings and so their use for self-catering accommodation would result in a distinct change to the local culture. Prioritising housing if there is local need will help maintain communities.</p>	<p>-</p>	<p>This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or delapidated buildings or sites. This may result in a negative effect if iconic buildings are removed, but has the potential to allow new developments to add to the cultural distinctiveness of a community with careful design. Buildings in the countryside are usually redundant agricultural buildings and so their use</p>
--	----------	--	------------	---	------------	--	----------	---	----------	---

				accommodati on.		culture.				for self- catering accommodati on would result in a distinct change to the local culture.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0		0		0		0	
12. Reduce the negative impacts of waste.	0		0		0		0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0		0		0		0	
14. Maintain and enhance biodiversity both within and outside	-	Appropriate protection of biodiversity policies will	-/+	This maintains the status quo.	+	By using brownfield sites this should minimise the	+	By using brownfield sites this should minimise the	+	By using brownfield sites this should

designated sites		ensure that sites are not located to minimise the impacts on biodiversity, where possible.				impact on biodiversity, although some species may require appropriate policies to ensure their protection.		impact on biodiversity, although some species may require appropriate policies to ensure their protection.		minimise the impact on biodiversity, although some species may require appropriate policies to ensure their protection.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0		0				0	

Overall assessment and suggested changes	-	Does not protect the landscape in the TGA from self catering development	+	Protects the landscape of the National Park but does not allow for creation of more visitor accommodation most suitable for year round use	+	Avoids the landscape impacts of allowing new build / green field self catering development. Mixed impact on communities buildings used for visitor accommodation rather than homes, but visitors may help support local facilities.	++	Avoids the landscape impacts of allowing new build / green field self catering development. Improving visitors facilities may help support local facilities, but prioritising affordable housing where needed ensures that is not at the expense of housing people.	+	Avoids the landscape impacts of allowing new build / green field self catering development. Mixed impact on communities buildings used for visitor accommodation rather than homes, but visitors may help support local facilities.
<b>Recommendation</b>	<b>Preferred Options: 56a</b>									

<b>Policy 23d): VISITOR ECONOMY</b>		
Option exclusivity: 40 or 41	Option 40: Proposals for visitor attractions and recreational and leisure development will be permitted in the Local Service and Tourism Centre and the Local Centres. Proposals for visitor attractions in Rural Centres will need to demonstrate a need to be outside the Local Service and Tourism Centre and Local Centres. Proposals to locate visitor attractions in the countryside will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings	Option 41: Proposals for visitors attractions and recreational and leisure development will be permitted within settlements. Proposals for attractions outside settlements will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings whenever possible.

	whenever possible			
SA Objective	Summary	Commentary	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	++	<p>This option allows attractions in the most accessible locations, with a need to demonstrate a reason to be elsewhere.</p> <p>Need to include reference for proposals in remote locations to ensure there is no adverse traffic impact. See proposed new policy option under transport.</p>	-	This option allows attractions in a greater number of settlements irrespective of their accessibility, with a need to demonstrate a reason for need to be outside settlements.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	+	This option encourages attractions in the largest settlements with a need to demonstrate a reason to be elsewhere. These are the settlements most likely to be able to absorb such developments.	-	This option encourages attractions in a greater number of settlements which may not be so easily absorbed.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and	++	Encouraging attractions in the largest settlements will encourage multi-purpose trips or walking and cycling directly from accommodation.	+	Encouraging attractions in settlements may allow some multi-purpose trips or walking and cycling directly from accommodation.



cycling) and volunteering opportunities.				
5. Increase the number of visitors using the National Park outside the peak visitor season.	0		0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	?	The most significant element is flooding, this can only be judged on a specific site basis	?	The most significant element is flooding, this can only be judged on a specific site basis
7. Reduce factors contributing to climate change.	++	Attractions within settlements are likely to reduce the need to travel by private car.	+	Attractions within settlements are likely to reduce the need to travel by private car, although this option fails to distinguish between the accessibility of various settlements.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Encouraging attractions in settlements will help to sustain employment opportunities.	++	Encouraging attractions in settlements will help to sustain employment opportunities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0	
10. Maintain the cultural distinctiveness of communities.	++	This option encourages attractions in the largest settlements with a need to demonstrate a reason to be elsewhere. These are the settlements most likely to be able to absorb such developments.	-	This option encourages attractions in a greater number of settlements which may not be so easily absorbed.
11. The adverse effects of minerals exploitation	0		0	

in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.				
12. Reduce the negative impacts of waste.	0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0		0	
14. Maintain and enhance biodiversity both within and outside designated sites	+	Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity, where possible.	+	Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity, where possible.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0	
Overall assessment and suggested changes	++	<b>Include reference to the need for proposals in remote locations to ensure there is no adverse traffic, landscape or biodiversity impacts. See proposed new policy option under transport.</b>	+?	<b>Would result in more negative impacts of attractions being felt over a wider range of settlements than option 40, with no extra benefits</b>
<b>Recommendation</b>	<b>Preferred option: 40 over 41 as fewer negative impacts in fewer places.</b>			

<b>Policy 30: EMPLOYMENT SITES &amp; LIVE/WORK UNITS</b>						
Option exclusivity: 34 or 35 or 36	Option 34: Allocate land at Tenby, St Davids, Newport and Saundersfoot for employment use. Develop criteria-based policies to direct small-scale employment proposals to appropriate locations in rural centres or buildings suitable for conversion in the countryside. (See Scale of Growth Section) <sup>20</sup>		Option 35: Allocate land at Tenby, St Davids, Newport and Saundersfoot for employment use for medium and larger scale enterprises. Develop criteria-based policies to direct small-scale employment proposals to appropriate locations in Tenby, the local centres, rural centres and buildings suitable for conversion in the countryside. <sup>21</sup>		Option 36: Allocate smaller sites throughout the National Park area for use by small-scale businesses <sup>22</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0		0	
2. Decrease the length and number of journeys made by private car to and within the National	+	Location of employment uses in the main settlements allows for maximum accessibility by means other	--	Location of employment uses in the main settlements allows for maximum accessibility by means other	+	Anecdotal evidence would suggest that demand for business premises in the National Park is for small-scale premises. The allocation of land for this purpose

<sup>20</sup> Land for development in the National Park is limited. If possible, allocation of suitable sites in the main settlements of the National Park would cater for locally-generated demand which tends to be for smaller-scale businesses.

<sup>21</sup> In order to encourage medium and larger scale enterprises the allocated sites should be retained for these purposes. Other locally generated demand for small-scale businesses would be directed to appropriate sites in Tenby, local centres, rural centres and through conversion of suitable buildings in the countryside. Issues of whether the landscape has capacity for this forms of development or whether there is evidence of such a need or use.

<sup>22</sup> This policy approach would protect land for small-scale businesses through in a range of settlements throughout the National Park. The limited amount of developable land, however, would mean a reduction of land available for other uses such as housing or community facilities. It may also increase the need to travel if businesses establish in remote locations or places not served by public transport.

Park by both residents and visitors.		than private car. This would be offset to some extent by allowing conversion of buildings in remote locations to be used for employment uses.		than private car. However, even the largest settlements in the National Park are relatively remote and therefore less suitable in terms of accessibility than other locations outside the National Park. Allowing small scale proposals in the local and rural centres and through the conversion of buildings in remote locations for employment uses may also result in development in less accessible locations.		throughout the Park would allow demand to be met locally possibly reducing journey lengths. It would not necessarily allow travel by means other than the private car as the smaller settlements and rural areas are not as well served by public transport.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	+	This option directs development to the larger settlements in the National Park which are most likely to be able to best absorb it.	--	Even the largest settlements in the National Park are of a modest size and development of large scale enterprises may conflict with this criterion. Lack of demand for medium scale enterprises may sterilise allocated sites and additional sites needed to be sought for small scale enterprises.	-	The development of business premises in some locations may adversely affect the landscape or townscape.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0		0	
5. Increase the number of visitors using the	0		0		0	

National Park outside the peak visitor season.						
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	+	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.	+	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.
7. Reduce factors contributing to climate change.	-	Location of employment uses in the main settlements allows for maximum accessibility by means other than private car. This would be offset to some extent by allowing conversion of buildings in remote locations to be used for employment uses, although they may meet a need arising from within the immediate locality. Criteria based policies directing development to other sites should include reference to the need to decrease length and number of journeys made by car. Building design will need to incorporate sustainable design criteria.		Location of employment uses in the main settlements allows for maximum accessibility by means other than private car. This would be offset to some extent by allowing conversion of buildings in remote locations to be used for employment uses, although they may meet a need arising from within the immediate locality. Criteria based policies directing development to other sites should include reference to the need to decrease length and number of journeys made by car. Building design will need to incorporate sustainable design criteria.		The allocation of land for business use throughout the Park would allow demand to be met locally possibly reducing journey lengths. It would not necessarily allow travel by means other than the private car as the smaller settlements and rural areas are not as well served by public transport.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	This policy option directs business developments to existing settlements thereby providing employment opportunities.	-	Demand is for small scale enterprises in the National Park. This option may lead to sterilisation of land allocated for larger enterprises and fail to sustain those communities.	+	This policy option directs business developments to existing settlements thereby providing employment opportunities.

				Smaller communities would be sustained, although care would need to be taken to ensure that smaller settlements are not overwhelmed by demand from outside the community.		
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0		0	
10. Maintain the cultural distinctiveness of communities.	++	This option matches the scale of development to the size of the settlement thus maximising the likelihood of maintaining the cultural distinctiveness of communities.	--	Even the largest settlements in the National Park are of a modest size and development of large scale enterprises could adversely impact on their cultural distinctiveness.	+	Small scale developments should not adversely affect the cultural distinctiveness of communities. In some instances they may enhance it by providing premises for locally-grown businesses.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0		0	
12. Reduce the negative impacts of waste.	0		0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to	0		0		0	

meet the needs of the National Park population						
14. Maintain and enhance biodiversity both within and outside designated sites	?+	Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity, where possible.	?+	Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity, where possible.	?+	Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity, where possible.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0			
Overall assessment and suggested changes	+	<b>Include reference to the need for proposals in remote locations to ensure there is no adverse traffic impact. See proposed policy option 128 under transport.</b>	-	<b>Demand arising from within the National Park is for small scale enterprises. This option also caters for demand arising from outside the Park. Even the largest National Park settlements are relatively remote, compared with other larger settlements outside. This option is therefore less sustainable than option 34 in terms of accessibility, impact on the National Park settlements and in prudent use of the scarce National Park land resource.</b>	+	<b>Similar sustainability performance to option , though potentially less desirable re landscape</b>

<b>Recommendation</b>	<b>Preferred Option: 34 subject to suggested change.</b>
-----------------------	--

<b>Policies 32 &amp; 33: HOUSING &amp; AFFORDABLE HOUSING</b>				
Option exclusivity: 60 or 61	Option 60: With an estimated supply of 1,300 housing units or less seek to negotiate 50% affordable housing in developments of 2 or more units in housing developments. Where housing need is greater than supply in individual centres seek to allocate land for 100% affordable housing on small sites of 10 units or less. Also allow the exceptional release of land in these locations for affordable housing. There will also be opportunities in countryside locations through filling in gaps or rounding off – see Scale and Location of Growth Policy Options. <sup>23</sup>		Option 61: Continue with the Joint Unitary Development Plan approach and seek to negotiate 20% on sites of 3 or more units. Also allow the exceptional release of land in these locations for affordable housing within or adjacent to settlements. <sup>24</sup>	
<b>SA Objective</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	-/+	May mean the loss of good agricultural land or financial support for the farming community.	-/+	See across.
2. Decrease the length and number of journeys	++	Unlocks land so local people can live locally and need to travel less.	+	See across but to a lesser extent as less being negotiated.

<sup>23</sup> If a greater supply of land for housing cannot be found then the target for provision will not be achieved. Developers may seek to hold land in hope of a less onerous affordable housing requirement in the future. The Authority seeks to achieve to meet its affordable housing requirements locally. Sites developed solely for affordable housing would integrate better with local communities if smaller in size.

<sup>24</sup> Developers are becoming familiar with this approach. It is unlikely to achieve the affordable housing needs of the National Park. A settlement is defined in the Joint Unitary Development Plan as 'a group of houses which form a village or hamlet where there is a physical cohesion of dwellings'



made by private car to and within the National Park by both residents and visitors.				
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	++	Possibly positive because better use of land that is suitable for development is being made.	+	Possibly positive because better use of land that is suitable for development is being made – but to a lesser extent than across.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0		0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+/-	See above for travel but also carbon emissions likely to increase because of increased building of dwellings.	+/-	See above for travel but also carbon emissions likely to increase because of increased building of dwellings.
7. Reduce factors contributing to climate change.	+/-	See above for travel but also carbon emissions likely to increase because of increased building of dwellings.	+/-	See above for travel but also carbon emissions likely to increase because of increased building of dwellings.

8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Directly related to this objective.	+	Directly related to this objective but less effective than the first option.
9. Encourage access for all to the National Park, reflecting the social mix of society.	++	Ensuring affordable housing is available should make housing more accessible.	+	As across but to a lesser extent.
10. Maintain the cultural distinctiveness of communities.	++	Ensuring local people can live locally should assist.	+	As across but to a lesser extent.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	-	Likely to lead to using more minerals	-	See across.
12. Reduce the negative impacts of waste.	-	Likely to lead to more waste generation.	-	Likely to lead to more waste generation.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+/-	Affordable housing provision can help support community facilities but may mean less contributions for other community facilities.	+/-	Affordable housing provision can help support community facilities but may mean less contributions for other community facilities (to a lesser extent).
14. Maintain and enhance biodiversity both within and outside	++	More likely to be making better use of land to meet priorities and placing less pressure on less suitable land.	+	See across but to a lesser extent as targets are lower.

designated sites				
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	National Planning policy will protect water quality. The sustainable design policy will refer to the sustainable use of the resource.	+	See across.
<b>Overall assessment and suggested changes</b>	<b>++</b>	<b>Minerals and waste policies of the Plans should ensure that the most sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable but the sustainable design policies of the Plan should seek to mitigate. The prioritising of affordable housing provision versus other planning gain opportunities are dealt with in the Community Facilities section. There may be sustainability issues with explicitly considering exceptional land release that should be explored as this option is worked up in the Deposit Plan.</b>	<b>+</b>	<b>Minerals and waste policies of the Plans should ensure that the most sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable but the Sustainable Design policies should seek to mitigate. The prioritising of affordable housing provision versus other planning gain opportunities is dealt with in the Community Facilities section.</b>
<b>Recommendation</b>	<b>The first option contributes most in terms of the sustainability objectives, though the implications of exceptional land release should be considered as this policy option is carried into the Deposit Plan.</b>			

<b>Policy 36: COMMUNITY FACILITIES &amp; INFRASTRUCTURE REQUIREMENTS</b>		
Option exclusivity: 23 or 24	Option 23: Seek enhancement of community facilities or their provision when required by proposed developments. <sup>25</sup>	Option 24: Seek to prioritise benefits to contribute to dealing with the most acute areas of need for National Park communities. <sup>26</sup>

<sup>25</sup> Where there are a number of 'demands' for community benefit it may mean that, for example, opportunities to secure a greater proportion of affordable housing may be lost. Such an approach is more likely to spread the community benefit more widely across a range of services and facilities. It could include both maintenance and provision issues.

<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Proposals as a result of community gain could be sited on good farmland. If the land was protected by national planning policy this could mean the loss of a financial contribution to the farming community.	+/-	Proposals as a result of community gain could be cited on good farmland. If the land was protected by national planning policy this could mean the loss of a financial contribution to the farming community.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	If the planning gain results in the maintenance or creation of community facilities closer to where the user requires. This the policy approach advocated. Also contributions can include transport schemes.	?	In most communities the most pressing need is likely to be for affordable housing ( The preferred option being proposed is to locate affordable housing in accessible locations). It could mean that contributions to, for example, transport schemes lose out.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	+	Contributions can include archaeology, nature conservation and the historic environment.	-	In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, archaeology, nature conservation and the historic environment losing out. However, any proposal for affordable housing would need to be compatible with the statutory purposes of the National Park.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and	+	Contributions can be to open space, recreational and leisure facilities and transport schemes.	-	In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, open space, recreational and leisure facilities and transport schemes losing out.

<sup>26</sup> This approach would be more targeted but could be difficult to implement.

volunteering opportunities.				
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Contributions can be for open space, recreational and leisure facilities and transport schemes which may help attract more visitors.	-	In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, open space, recreational and leisure facilities and transport schemes losing out.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Planning gain may take the form of flood protection measures that protect the existing community as well, or landscape enhancements that deliver biodiversity gains.	-	If the planning gain is focused on factors vulnerable to climate change (e.g. flood defences or habitat enhancement) than the benefits with regard to this Sustainability Objective would be significant. However the focus may be in other areas (e.g. affordable housing) which is most likely diverting resources away from managing the effects of climate change.
7. Reduce factors contributing to climate change.	+	See comments relating to Sustainability Objective 2 (car use).	+/-	See comments relating to Sustainability Objective 2 (car use).
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Option ensures that some of the profits from development are used to benefit the local community.	++	Option ensures that some of the profits from development are used to provide those benefits most needed by the local community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	Contributions can improve accessibility to facilities and services in the community more generally.	+	See across but in a more targeted way.
10. Maintain the cultural distinctiveness of communities.	+	Any option that aims to provide needed facilities in a community is likely to contribute to maintaining community distinctiveness. Also an element of the contribution is for archaeology and the historic environment.	+	In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, archaeology, nature conservation and the historic environment losing out..
11. The adverse effects of minerals exploitation in the National Park decline from the present	-	Likely to result in the use of minerals.	-	See across.

level and the potential biodiversity and landscape gains of former minerals sites are realised.				
12. Reduce the negative impacts of waste.	+	The range of facilities promoted includes recycling.	-	In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, recycling being lost.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+?	Will make resources available to create or maintain community services, but possibly not enough in any one sector to do so effectively.	-	In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, recycling community facilities being lost.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Could deliver habitat/ landscape enhancements that benefit biodiversity.	-	Could deliver habitat/ landscape enhancements that benefit biodiversity if that is most important consideration for the community. More likely that affordable housing would be the priority.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Environmental enhancements including flood defence can be included.	-	In most communities the most pressing need is likely to be for affordable housing which may result in contributions to, for example, environmental enhancements including flood defence being lost.
<b>Overall assessment and suggested changes</b>	?	<b>Most development in the National Park is small. Would such a broad and shallow approach to planning gain result in too little being available for any one community facility or service for any to be delivered effectively.</b>	<b>+?</b>	<b>The nature of the impact of this option (i.e. which Sustainability Objectives benefit) depends greatly on what takes priority. It is most likely to be affordable housing.</b>
<b>Recommendation</b>	<b>The second option is preferred as being the most realistic with affordable housing being given priority.</b>			

<b>Policy 37: RETAIL IN THE NATIONAL PARK</b>				
Option exclusivity:	Option 94: To draw extensive centre boundaries <sup>27</sup>		Option 95: To draw restricted town and district centre boundaries <sup>28</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	?	Extensive centre boundaries would enable retail and other commercial development to take place without due consideration of the accessibility of the development by a choice of means of transport, and the impact on overall travel patterns. Each case could result in a different assessment and the outcome should remain as unknown.	?	A restricted town centre might mean that suitable sites for some applications could only be found on a sequential basis, but such proposals would be considered on merit and the impact on car travel would be part of that consideration
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment)	--	Could result in the change in character of residential or tourist accommodation areas in and around town centres. Might also result in the change in character, or even voids, in the existing commercial streets.	++	Would maintain the existing character of town centres and the surrounding areas. Whether this is good will depend on the current nature of the centre, i.e. some change to the extent of the town centre may be desirable, though this is unlikely in the centres in the National Park

<sup>27</sup> Ministerial Interim Planning Policy Statement 02/2005 states that 'need' for development is not a consideration within centres. Extensive centres allow the potential for new development away from existing commercial streets. These can compete with and harm the commercial core of towns rather than compliment them.

<sup>28</sup> This replicates the traditional approach to boundaries which closely defines the extent of the existing and allocated retail development. This approach enables the Authority to fully assess the impact of proposals which lie outside the boundary, and supports the potential for investment within the commercial core of the centre rather than outside it.

and archaeology) with reference to the special qualities of the National Park				
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	?	Shopping is one of the most popular recreational activities. Retail opportunities which are not part of a compact centre can encourage separate journeys, often by car.	+	Though a popular recreation activity, shopping, particularly in compact centres, probably cannot be considered as strenuous physical activity. However, it provides opportunities for moderate activity for less active sections of the community.
5. Increase the number of visitors using the National Park outside the peak visitor season.	?	Dispersed centres can lack character and sense of focus, reducing investment in primary areas, which may discourage visits.	?	Compact centres which are attractive and vital can encourage visitors outside the peak season. The off-peak closure of business can however discourage visits.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0		0	
7. Reduce factors contributing to climate change.	0	See comment for Sustainability Objective 2, car use	0	See comment for Sustainability Objective 2, car use
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0		0	
9. Encourage access for all to the National Park, reflecting the social mix	0		0	



of society.				
10. Maintain the cultural distinctiveness of communities.	0	The National Park's retail centres generally have a relatively low proportion of national multiple retailers. This however is due to the lack of investment opportunity, rather than the relative location of boundaries,	0	The National Park's retail centres generally have a relatively low proportion of national multiple retailers. This however is due to the lack of investment opportunity, rather than the relative location of boundaries,
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0	
12. Reduce the negative impacts of waste.	-?	May result in the unsightly effects of commercial waste awaiting collection on bin day being felt across a wider area of the town.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	-	Large centres can allow stores to be developed which could undermine the expenditure available to the commercial core of the existing centres and adversely affect retail provision.	+	Compact centres, will require that a sequential approach is taken to new store development, where the available expenditure is a consideration in whether there is a need for any new retail development, This approach protects centres and the community retail uses within them.
14. Maintain and enhance biodiversity both within and outside designated sites	0		0	
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal	0		0	

waters.				
<b>Overall assessment and suggested changes</b>	-	<b>Extensive boundaries have little relationship with many of the sustainability objectives. It would have the potential to undermine the commercial core of centres, and may dilute the character of centres, and can create additional travel.</b>	+	<b>A compact boundary, which focuses new investment within a centre, can help to maintain the townscape, and character, and has positive outcomes for sustainability in terms of meeting the needs of the local community.</b>
<b>Recommendation</b>	<b>Choose option 95 as the preferred option as this is more likely to achieve sustainability objectives.</b>			

<b>Policy 37: RETAIL IN THE NATIONAL PARK</b>				
Option exclusivity: 96 or 97	Option 96: Retain primary retail frontages within Tenby town centre. <sup>29</sup>		Option 97: Remove primary retail frontages from Tenby town centre <sup>30</sup>	
<b>SA Objective</b>	<b>Sum- mary</b>	<b>Commentary</b>	<b>Sum- mary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0	
2. Decrease the length and number of journeys made by private car to	+?	This policy option would assist in the retention of a broad range of shopping opportunities within Tenby town centre, and make the centre	-	Should non retailing uses over dominate the main shopping areas within the centre, it is likely to be less attractive to a full range of shoppers, and as a

<sup>29</sup> This would ensure that non retailing uses cannot further dominate primary shopping areas. It would assist the town centre in retaining sufficient shopping units to be attractive to shoppers as well as allowing a broad diversity of uses at secondary locations.

<sup>30</sup> This would allow all types of commercial uses to disperse throughout the town centre whilst some uses such as pubs and cafes could become more numerous, it could mean the displacement of some retailers to secondary, and less attractive retailing locations.

and within the National Park by both residents and visitors.		attractive to shoppers who may otherwise travel to other centres		consequence people may increase the number of journeys to alternative centres to obtain goods not available in Tenby.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	?	Redevelopment can bring investment and help to conserve the townscape. This can happen when shops change occupiers.	+	New frontages and internal refurbishment can bring investment and help to conserve the townscape, if sympathetically applied.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	A broad range of shopping opportunities can help to attract visitors	+ / -	A broad range of refreshment facilities can help to support visitors, albeit that this can, if over dominating, deter a full range of shoppers
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0		0	
7. Reduce factors contributing to climate change.	0		0	

8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	This policy option would assist in the retention of a broad range of shopping opportunities within Tenby town centre, and make the centre attractive to shoppers and maximise its contribution to sustaining the local community	-	Should non retailing uses over dominate the main shopping areas within the centre, it is likely to be less attractive to a full range of shoppers and as a consequence it would be less able to support the local communities shopping needs
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0	
10. Maintain the cultural distinctiveness of communities.	?		?	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0	
12. Reduce the negative impacts of waste.	0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	++	Ensuring that shops are retained within the main shopping areas will help to serve community needs	-	Allowing non shopping uses to dominate centres, is likely to restrict the provision of facilities to the community.
14. Maintain and enhance biodiversity both within and outside	0		0	

designated sites				
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0	
<b>Overall assessment and suggested changes</b>	<b>+</b>	<b>This option is more likely to retain a range of shopping opportunities within the centre, attracting visitors and make it less likely that residents will have to travel to alternative centres for their shopping needs.</b>	<b>-</b>	<b>Whilst non retail uses can bring investment and refurbishment to centres, this does not outweigh the impact of reduced shopping opportunities within the centres</b>
<b>Recommendation</b>	<b>Choose option 96 as the preferred option as this is more likely to achieve sustainability objectives.</b>			

<b>Policy 37: RETAIL IN THE NATIONAL PARK</b>				
Option exclusivity: 98 or 99	Option 98: Make existing centres more attractive places to visit through regeneration <sup>31</sup>		Option 99: Allocate sites for retail development <sup>32</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and	0		0	

<sup>31</sup> Small scale, sympathetic regeneration at an appropriate scale could introduce niche retail opportunities. It can also help to maintain historic buildings and improve the attractiveness of centres by ensuring a balance between conservation and economic viability, and without compromising the established role and strengths of centres as tourist destinations.

<sup>32</sup> Large scale redevelopment or allocation of sites would be harmful to the historic character of many centres and could attract a greater proportion of national multiples, increasing the perceived blandness of the high street. Any large scale allocation which resulted in an alteration to the retail hierarchy, also has the potential to be incompatible with the centre hierarchy set out in the revised draft (as at 07-2-07) of the Wales Spatial Plan Pembrokeshire Haven Key Settlement Framework 2021.

enhancing landscape, biodiversity and community well being.				
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	Encouraging visits to local centres rather than competing centres outside of National Park could help to reduce the length of car journeys	+	Allocating sites for retail development could help to reduce the length of journeys to competing centres outside of the National Park.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	++	Conservation and enhancement of townscapes will be a positive benefit of sensitive regeneration	-	Allocating sites for retail development could be harmful to townscapes, and historic character. The current approach to large open plan stores means that existing character within the area could be lost and not replaced.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Shopping forms an accepted recreational activity.	+	Shopping forms an accepted recreational activity.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	More attractive centres can increase visitor numbers throughout the year, including off- peak seasons	+ / -	A greater range of shops can increase visitor numbers, however large allocations which can erode character and introduce the blandness of the high street can discourage visitors.
6. Manage the effects of climate change with particular reference to the risk of flooding; the	0		0	

effect on biodiversity; public health.				
7. Reduce factors contributing to climate change.	+	See objective 2 above	+	See objective 2 above
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	This approach would help to maximise development opportunities	+	This approach would provide additional facilities to local communities
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0	
10. Maintain the cultural distinctiveness of communities.	++	Retail centres within the National Park, lacking in National Multiples can have a cultural distinctiveness	-	Large allocations, attracting national multiples will erode cultural distinctiveness.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.	0		0	
12. Reduce the negative impacts of waste.	0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to	+	Redevelopment can introduce mixed use schemes, and support community facility provision	+	Retail developers may also contribute to the needs of the National Park community.

meet the needs of the National Park population				
14. Maintain and enhance biodiversity both within and outside designated sites	0		0	
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0	
<b>Overall assessment and suggested changes</b>	<b>+</b>	<b>Regeneration of existing centres helps to maintain the historic townscapes of centres, encourages local shopping by residents. It will maximise opportunities for development to sustain communities, and encourage visitors throughout the year.</b>	<b>+/-</b>	<b>Allocating sites for retail development, can erode cultural distinctiveness and may negatively impact on historic character. Development may however also bring gains to the community</b>
<b>Recommendation</b>	<b>Choose option 98 as the preferred option.</b>			

<b>Policy 37: RETAIL IN THE NATIONAL PARK</b>			
Option exclusivity: 100 or 101 or New option	Option 100: Introduce primary retail frontages with identified centres of the National Park. <sup>33</sup>	Option 101: Allow commercial uses to locate anywhere within smaller centres. <sup>34</sup>	New Option: Do not allow A3 uses to cause unacceptable disturbance to occupiers of nearby property, in particular residential property.

<sup>33</sup> This would ensure that proposals for non-retail uses such as cafes or restaurants are considered in the context of the role and function of the centre and the potential loss of retail uses to the local community for their daily and more general shopping needs. Ministerial Interim Planning Policy Statement 02/2005, paragraph 10.3.7, states that local planning authorities should seek to retain an adequate level of provision for food shopping, together with post offices and pharmacies in existing centres. This policy option would support this approach.

<sup>34</sup> This would allow commercial development throughout the centres, and in cases where there is continuing pressure for the displacement of existing retail uses by non-retail users this would continue.



<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>	<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0		0		0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	This option would help to retain a range of shopping uses within the centres and would encourage shopping within local centres, rather than journeys to alternative centres	-	This option would support a tourism role, but would mean that local communities could have to travel further for everyday shopping needs	0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	?	Conservation of the townscape can occur when shops change occupiers	+	New frontage and internal refurbishment can bring investment and help to conserve the townscape if sympathetically done.	0	
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0		0		0	

5. Increase the number of visitors using the National Park outside the peak visitor season.	+	A broad range of shopping opportunities can help to attract visitors	+	A broad range of refreshment facilities can help to support visitors.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0		0		0	
7. Reduce factors contributing to climate change.	+	See objective 2 above	-	See objective 2 above	0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0		0		+	May help prevent the kind of uses that might harm the local community, but will allow flexibility to ensure businesses are viable.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0		0		0	
10. Maintain the cultural distinctiveness of communities.	?		?		0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are	0		0		0	

realised.						
12. Reduce the negative impacts of waste.	0		0		0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	This option would help to retain a range of shopping uses within the centres and would encourage shopping within local centres, therefore sustaining local communities	-	This option would support a tourism role, but would mean that local communities could have to travel further for everyday shopping needs, making the community less self sufficient.	+	Will allow flexibility to ensure community facilities (particularly those that are privately run) are viable.
14. Maintain and enhance biodiversity both within and outside designated sites	0		0		0	
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0		0		0	

<b>Overall assessment and suggested changes</b>	<b>+?</b>	<b>This option would help to maintain a range of shopping facilities at shopping centres, reducing the need to journey to competing centres. The tourism role could be maintained within existing uses within prime areas, but could restrict the development of new refreshment facilities within these prime areas</b>	<b>+/-</b>	<b>This option could erode the retail role of centres, and make them less attractive places to shop for local people. New refreshment facilities and other commercial development could continue to take place at secondary locations</b>	<b>+</b>	<b>The option represents a practical approach to preventing undesirable activities in Centres, whilst at the same time being flexible enough to ensure businesses in the centres can pursue activities that may improve their viability.</b>
<b>Recommendation</b>	<b>The new option is preferred</b>					

<b>Policy 45: SPECIAL QUALITIES</b>					
Option exclusivity: 82 or 83	Option 82: To continue with the green wedges identified within the Joint Unitary Development Plan. <sup>35</sup>			Option 83: Review the need for, and the extent of green wedges within the Local Development Plan. <sup>36</sup>	
<b>SA Objective</b>	<b>Summary</b>	<b>Commentary</b>		<b>Summary</b>	<b>Commentary</b>
1. Economically viable agriculture and forestry sectors that are contributing to conserving and				+ ?	Development justified for agricultural or forestry needs is permitted within green wedges. Green wedges can help to retain land for agriculture and forestry purposes

<sup>35</sup> Such an approach does not take account of Welsh Assembly Government requirement to review the need for and extent of green wedges as part of the development plan process.

<sup>36</sup> A review of green wedges would provide a justification for the continued use of green wedges, their amendment, or abandonment. The National Park Authority will liaise with Pembrokeshire County Council where areas lie within the jurisdiction of both planning authorities.

enhancing landscape, biodiversity and community well being.				
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.			0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park			++?	If green wedges are an effective way of protecting the landscape from inappropriate development, then a review that defines appropriate green wedges (assuming landscape is the primary consideration in the review) will conserve and enhance the landscape around settlements.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.			0	
5. Increase the number of visitors using the National Park outside the peak visitor season.			0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the			0	

effect on biodiversity; public health.				
7. Reduce factors contributing to climate change.			0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.			-?	Green wedges, if retained within the development plan, could restrict the opportunities for development in support of sustainable communities.
9. Encourage access for all to the National Park, reflecting the social mix of society.			0	
10. Maintain the cultural distinctiveness of communities.			0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.			0	
12. Reduce the negative impacts of waste.			0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to			-?	Green wedges, if retained within the development plan, could restrict the opportunities for development for community facilities.

meet the needs of the National Park population				
14. Maintain and enhance biodiversity both within and outside designated sites			+?	Green wedges can help to maintain wildlife.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.			0	
<b>Overall assessment and suggested changes</b>		<b>This option would not accord with the review of green wedges set out at paragraph 2.6.12 of Planning Policy Wales and is not appraised.</b>	<b>+?</b>	<b>Green wedges should be based on a sound assessment, the outcome of which cannot be known until the review takes place. It is clear that, notwithstanding this, there is little relationship between this option and many of the sustainability objectives. Green wedges do have the potential to conserve landscapes, biodiversity, and to retain agriculture or forestry, but may limit the opportunity for new community facilities.</b>
<b>Recommendation</b>	<b>Option 83 is the preferred option. Assessment against the Sustainability Objectives should be a component of the review of Green Wedges.</b>			