
Pembrokeshire Coast National Park

Local Development Plan 2
(2015-2031)

Background Paper No *: Alternative Options & Appraisal

April 2018

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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Aim of this Paper

1. The Alternative Options background paper for the 1st Local Development Plan set out the background to choosing the spatial and policy options for the 1st Local Development Plan where there were different policy options available.
2. The Review Report for the 1st Local Development Plan was approved in June 2016. The report sets out areas where the Plan is delivering along with areas where it needs to change and why.
3. This updated Background Paper takes account of the changes proposed to the Plan.
4. Where a choice of policy options were considered for the first Local Development Plan the most sustainable policy option was chosen. For this Local Development Plan where there is a choice the optimum policy position is chosen taking account of the findings of the sustainability appraisal and assessing the policy against the soundness tests.
5. This updated Alternative Options Background Paper also identifies where the Equalities Impact Assessment or the Habitats Regulations Assessment for the preferred policy choice suggested a change was needed.
6. These papers will provide information for officers and Members of the Authority, stakeholders, members of the public and the Inspector and those attending Local Development Plan Examination to help explain the approach being taken in the replacement Local Development Plan.
7. These papers will be updated through the Plan preparation process to take account of new information emerging.

Keys used in this document

8. The summary symbols for Sustainability Appraisal used below can be interpreted as follows:

++	There is a generally consistent strong positive association between the policy option and the Sustainability Objectives.
+	There is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objectives.
0	There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).
-	There is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
--	There is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
?	The association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion

9. The Soundness Tests are colour coded green or red

✓	Meets relevant Test
✓ x	Both positive and negative results
x	Does not meet the Test

10. Those policies that have been edited as a result of the Equalities Impact Assessment and/or the Habitats Regulations Assessment will be highlighted with the following symbols respectively  .
11. Those strategic policies where alternative options were appraised and this option was the preferred option are suffixed with .

National Park Purposes and Duty (The overarching policy of the Plan)

Policy 1: NATIONAL PARK PURPOSES AND DUTY (Strategy Policy)

<p>Policy options appraised for the Local Development Plan Preferred Strategy = Option 92</p>	<p>This policy was not appraised as this policy reflects the National Park's statutory purposes and duty as set out in legislation -Environment Act 1995.</p>
<p>Soundness Test 1 Does the Plan fit?</p> <div style="background-color: #2e6b2e; color: white; padding: 2px 5px; text-align: center;">✓</div>	<p>Policy has regard to national planning policy and legislation that is extant. This policy has been included in the first Local Development Plan and its predecessor the Joint Unitary Development Plan.</p>
<p>Soundness Test 2 Is the Plan appropriate?</p> <div style="background-color: #2e6b2e; color: white; padding: 2px 5px; text-align: center;">✓</div>	<p>The policy is appropriate for the area in light of the current legislative framework for National Parks in Wales.</p>
<p>Soundness Test 3 Will the Plan deliver?</p> <div style="background-color: #2e6b2e; color: white; padding: 2px 5px; text-align: center;">✓</div>	<p>This policy is the one overarching strategic policy in the Plan and delivery will be primarily tested through the examining the more detailed policies of the Plan. It is derived from primary legislation.</p> <p>This policy has been included in the first Local Development Plan and its predecessor the Joint Unitary Development Plan. No issues have arisen with the policy's implementation over that time period (from 2006)</p>

Spatial Strategy

Introduction

12. Within the National Park the ability to consider numerous spatial options is constrained by its relationship as a predominantly thin strip on the edge of west Wales and the role of its settlements relative to larger centres further east.
13. For the 1st Local Development Plan the Authority reviewed the options available from the Wales Spatial Plan update¹ for the Pembrokeshire Haven along with some additions. Appendix 1 provides a summary of how the options were considered.

What Spatial Strategy option was chosen for the 1st Local Development Plan? (and why)

14. The Wales Spatial Plan preferred strategy (Option 3) was chosen for the 1st Local Development Plan because it delivered most in terms of the Sustainability Appraisal objectives (see above) and the soundness tests required that regard was had to the Wales Spatial Plan.
15. **The Local Development Plan appraisal of Wales Spatial Plan Option 3** considered that additional tiers (**Tiers 4 ‘Rural Centres’ and 5 ‘Countryside’**) were needed with development being targeted to locations that would be likely to be more accessible and more likely to support community facilities. The approach would help with conserving the National Park landscape and the strategy was quite tailored for individual settlements.
16. This preferred option is known as Option 4 ‘Focused Key Settlement/Hybrid Approach (with two additional Tiers)’ and is the spatial strategy in the current adopted Local Development Plan.

WSP/LDP Spatial Option 4: Focused Key Settlement/Hybrid Approach Strategy with 2 added tiers of settlement (Tier 4 Rural Centres and Countryside) ★1st LDP

To complement the Spatial Plan tiers of settlement set out in Option 3, which deal with the more strategic levels of settlement hierarchy in the Park, a fourth option was considered which added two additional tiers to the Wales Spatial Plan preferred option. This was the preferred option for the Pembrokeshire Coast National Park Local Development Plan.

Tier 4 ‘Rural Centres’ are identified for limited growth. These Centres have a

¹ The soundness tests ask that the Plan has regard to national policy and the Wales Spatial Plan – page 100 local Development Plan Manual – Edition 2- August 2015.

limited range of facilities which should meet the day to day needs of residents.

This approach should help sustain rural communities and reduce the need to travel.

Tier 5 ‘Countryside’ which in accordance with national planning policy development is strictly controlled except for certain forms of development that would normally be found in countryside location. For residential development including holiday let, affordable housing and market housing (infill and rounding off and conversion access to services were an important consideration).

17. Below is the Local Development Plan’s sustainability appraisal of this spatial option:

Overall sustainability Appraisal of Policy (Spatial Option 4)

+	Through its focus on meeting community needs and the concentration of development in existing centres rather than dispersing it through the countryside the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.
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18. This spatial strategy underpins policies 2 to 7 of the Local Development Plan. These policies are:

- Policy 2: Tenby Local Service and Tourism Centre (TIER 2) (Strategy Policy)
- Policy 3: Newport Local Centre (TIER 3) (Strategy Policy)
- Policy 4: Saundersfoot Local Centre (TIER 3) (Strategy Policy)
- Policy 5: St Davids Local Centre (TIER 3) (Strategy Policy)
- Policy 6: Rural Centres (TIER 4) (Strategy Policy)
- Policy 7: Countryside (TIER 5) (Strategy Policy)

19. The 1st Local Development Plan spatial strategy has largely stood the test of time in terms of identifying where to direct growth. Issues have arisen in relation to:

- Site deliverability/affordable housing issues with its consequential impacts on the performance of the various Centres and in countryside locations (Policies 2 to 7).
- Updates on community facilities that help define Rural Centres (Policy 6).

20. However, in terms of identifying where in principle to direct growth accessibility issues affecting Countryside Policy 7a (infill and rounding off) and Countryside Policy 7d (conversion) (Strategy Policy) have caused difficulties as set out in the Authority’s Annual Monitoring Reports and the Review Report.

21. The Local Development Plan Review Report advises with regard to

Alternative Options & Appraisal Background Paper March 2018

Countryside Policy 7a (infill and rounding off) and Countryside Policy 7d (conversion) (Strategy Policy) that the spatial strategy of the Local Development Plan has largely directed new development to identified Centres where there are a range of facilities and services available. Outside the Centres, development is limited to conversion of appropriate buildings or infill and rounding off in groups of buildings. The ability of site users to reach services and facilities by means other than private car is an important consideration in such cases and the Authority's Supplementary Planning Guidance (adopted in June 2013) sets out how this is assessed.

22. The approach to assessing accessibility, on a case-by-case basis using the criteria contained in the guidance, is proving to be challenging in an essentially rural planning authority and planning applications are being decided contrary to recommendation. This issue is being considered as part of the Local Development Plan revision. (Chapter 2 of the 2015 Monitoring Report refers.)
23. This issue is reflected in the soundness test assessment set out below for the 1st Local Development Plan's preferred spatial option 4.

Soundness Test 1 Does the Plan fit?	<p>Policy has regard for the Wales Spatial Plan. Policy also has regard to national planning policy.</p> <p>It is consistent with plans of neighbouring authorities in that it takes account of reducing the need to travel. It uses accessibility criteria to judge proposals on a case by case basis whereas neighbouring authorities generally only allow affordable housing in countryside locations.</p>
✓	The accessibility criteria used through supplementary planning guidance have been upheld on appeal.
Soundness Test 2 Is the Plan appropriate?	<p>Policy is appropriate for the locality, in so far as it seeks to address key issues of aiming to meet affordable housing need and helping to sustain Rural Centres.</p> <p>Locally however there are concerns that affordable housing would be permitted in inaccessible locations in infill and rounding off opportunities and conversion opportunities.</p> <p>There are also concerns that accessibility concerns need to be addressed at all in such a rural location.</p> <p>More up to date information on community facilities will mean that new Centres will need to be added to Policy 6 Rural Centres.</p>

Soundness Test 3 Will the Plan deliver?	<p>Spatial hierarchy distribution shows that the majority of development (58%) is in the Spatial Plan Tiers which is consistent with the need to focus development in the larger more accessible locations.</p> <table border="1" data-bbox="457 300 1219 1051"> <thead> <tr> <th data-bbox="457 300 965 361">Housing Completions</th><th colspan="2" data-bbox="965 300 1108 361">2010 to 2015</th></tr> <tr> <th data-bbox="457 361 965 444"></th><th data-bbox="965 361 1108 444">Annual</th><th data-bbox="1108 361 1219 444">% of total</th></tr> </thead> <tbody> <tr> <td data-bbox="457 444 965 527">Tenby</td><td data-bbox="965 444 1108 527">18</td><td data-bbox="1108 444 1219 527">37%</td></tr> <tr> <td data-bbox="457 527 965 610">Newport</td><td data-bbox="965 527 1108 610">0</td><td data-bbox="1108 527 1219 610">1%</td></tr> <tr> <td data-bbox="457 610 965 694">Saundersfoot</td><td data-bbox="965 610 1108 694">7</td><td data-bbox="1108 610 1219 694">15%</td></tr> <tr> <td data-bbox="457 694 965 777">St Davids</td><td data-bbox="965 694 1108 777">2</td><td data-bbox="1108 694 1219 777">5%</td></tr> <tr> <td data-bbox="457 777 965 860">Crymych</td><td data-bbox="965 777 1108 860">0</td><td data-bbox="1108 777 1219 860">0%</td></tr> <tr> <td data-bbox="457 860 965 943">Rural Centres</td><td data-bbox="965 860 1108 943">7</td><td data-bbox="1108 860 1219 943">15%</td></tr> <tr> <td data-bbox="457 943 965 1026">Countryside (All)</td><td data-bbox="965 943 1108 1026">12</td><td data-bbox="1108 943 1219 1026">26%</td></tr> <tr> <td data-bbox="457 1026 965 1087">Countryside conversions only</td><td data-bbox="965 1026 1108 1087">10</td><td data-bbox="1108 1026 1219 1087"></td></tr> <tr> <td data-bbox="457 1087 965 1087">Total</td><td data-bbox="965 1087 1108 1087">47</td><td data-bbox="1108 1087 1219 1087">100%</td></tr> </tbody> </table> <p>There are however issues regarding the deliverability of some sites for housing, employment, the provision of live/work units are addressed primarily under other policies but these strategic policies (Policy 2 to 7) will need revision to reflect this reassessment of sites.</p> <p>In terms of affordable housing, for example, 50% affordable housing provision has proved challenging in many locations in the National Park.</p> <p>For employment sites the ability to deliver without public subsidy is also an issue.</p> <p>The review of the Local Development Plan wording of Policies 2 to 7 will need to address this issue.</p> <p>Conversion in the Countryside: The Authority has struggled to achieve viability for affordable units on site in conversion opportunities in the countryside and housing associations have issues with taking on the management of such units.</p> <p>Delivery on affordable housing on infill and rounding off type opportunities is also difficult.</p> <p>Offsite affordable housing contributions where viable would be more realistic.</p> <p>Given local concerns outlined under Test 2 there are difficulties in delivering the current approach through the development management system.</p>	Housing Completions	2010 to 2015			Annual	% of total	Tenby	18	37%	Newport	0	1%	Saundersfoot	7	15%	St Davids	2	5%	Crymych	0	0%	Rural Centres	7	15%	Countryside (All)	12	26%	Countryside conversions only	10		Total	47	100%
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24. Given the issues outlined under the soundness tests arising from implementation of Spatial Option 4 to infill and rounding off and the conversion of buildings in the countryside above additional spatial options (showing changes in the Authority's approach to infill and rounding off and conversion of buildings) are set out under Policy 7 Countryside.
25. Policy 2 (Tenby), Policy 3 (Newport), Policy 4 (Saundersfoot), Policy 5 (St Davids) and Policy 6 (Rural Centres) are considered to remain sound in terms of the Wales Spatial Strategy and in terms of their relationship with spatial strategies in neighbouring plans. Issues in relation to site delivery for these locations, will require consequential amendments to elements of the strategy policies' wording (Policies 2 to 6) and reasoned justifications.
26. Policy 6 Rural Centres includes new Centres.

Policy 2	Tenby Local Service and Tourism Centre (TIER 2) (Strategy Policy) ★
Policy 3	Newport Local Centre (TIER 3) (Strategy Policy) ★
Policy 4	Saundersfoot Local Centre (TIER 3) (Strategy Policy) ★
Policy 5	St Davids Local Centre (TIER 3) (Strategy Policy) ★
Summary of Sustainability Appraisal Policies 2 to 5	
+ Soundness Test 1 Does the Plan fit? ✓	Through its focus on maintaining the character of the town and meeting the needs of its population these policies performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits. Policies 2 to 5 have regard for the Wales Spatial Plan. The policies have regard to national planning policy. They are consistent with plans of neighbouring authorities.
Soundness Test 2 Is the Plan appropriate?	Policies are appropriate for the locality in terms of its status in the spatial hierarchy and the issues it seeks to address. Issues arise regarding deliverability of sites to support these

✓	strategic policies – see below and this is being reviewed under later policies in the Plan. Consequential amendments have been made to these policies.
Soundness Test 3 Will the Plan deliver?	<p>Issues regarding the deliverability of some sites for housing, employment, the provision of live/work units are addressed primarily under other policies but these strategic policies (Policy 2 to 6) will need revision to reflect this reassessment of sites.</p> <p>In terms of affordable housing, for example, 50% affordable housing provision has proved challenging in many locations in the National Park.</p> <p>For employment sites the ability to deliver without public subsidy is also an issue.</p> <p>Local Development Plan policy wording of Policies 2 to 5 has been revisited when policies later in the Plan were reviewed.</p>
✓	✗

27. As advised above Policy 6 Rural Centres has worked as part of the spatial hierarchy. The Review Report identifies two areas for review, deliverability of sites and a refresh on what locations qualify as Centres. New Centres have consequently been added and the deliverability of sites considered through the candidate site process and subsequent Preferred Strategy consultation.

Policy 6 RURAL CENTRES (TIER 4) (Strategy Policy) ★

Summary of Sustainability Appraisal	
+	Through its focus on meeting community needs and the concentration of development in existing centres rather than dispersing it through the countryside the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.

Soundness Test 1 Does the Plan fit?	<p>Policy 6 has regard to the Wales Spatial Plan and to national planning policy.</p> <p>It is consistent with plans of neighbouring authorities.</p>
Soundness Test 2 Is the Plan appropriate?	<p>Policy is appropriate for the locality in terms of its status in the spatial hierarchy and the issues it seeks to address.</p> <p>Issues arise regarding deliverability of sites to support this strategic policy – see below and this is has been reviewed under later policies in the Plan.</p>

✓	✗	<p>Soundness Test 3 Will the Plan deliver?</p> <p>Issues regarding the deliverability of some sites for housing and employment are addressed primarily under other policies but these strategic policies (Policy 2 to 6) will need revision to reflect this reassessment of sites.</p> <p>In terms of affordable housing, for example, 50% affordable housing provision has proved challenging in many locations in the National Park.</p> <p>For employment sites the ability to deliver without public subsidy is also an issue.</p> <p>Policy 6 wording has been revisited when policies later in the Plan were reviewed.</p>
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28. As advised above elements of Policy 7 Countryside have issues arising which have the potential to affect the spatial strategy of the Plan. Other issues in relation to deliverability and new national planning policy (as identified in the Review Report) are also addressed.

Policy 7 COUNTRYSIDE (TIER 5) (Strategy Policy) ★

Infill and Rounding Off in the Countryside (Policy 7a)

29. As advised previously elements of Policy 7 Countryside have issues arising which have the potential to affect the spatial strategy of the Plan. With regard to infill and rounding off four options for the replacement Plan are considered below in terms of sustainability appraisal and soundness testing.

Option 7(a) 1 (current Policy 7(a) Countryside): it constitutes sensitive filling in of small gaps or minor extensions to isolated groups of dwellings is proposed. Priority will be given to meeting affordable housing needs. Release of land will depend on the character of the surroundings, the pattern of development in the area and the accessibility to the Centres identified in the hierarchy.

Summary of Sustainability Appraisal

++	<p>Accepting that certain impacts are unavoidable, this option (the current policy position in the adopted Local Development Plan) is the most compatible with the sustainability objectives of the 4 options as it is likely to deliver the most benefits by;</p> <ul style="list-style-type: none"> • reducing the need to travel • Securing affordable housing • and helping to sustain community facilities by locating infill development in accessible locations.
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Soundness Test 1 Does the Plan fit?	This Policy proposal does have regard to national planning policy. It is consistent with plans of neighbouring authorities.
Soundness Test 2 Is the Plan appropriate?	Policy is appropriate for the locality, in so far as it addresses key issues of aiming to meet affordable housing need and helping to sustain rural areas. Locally however there are concerns that affordable housing would be permitted in inaccessible locations in infill and rounding off opportunities. There are also concerns that accessibility should be addressed in such a rural location.
Soundness Test 3 Will the Plan deliver?	Delivery on affordable housing on infill and rounding off type opportunities is difficult. Offsite affordable housing contributions where viable would be a more realistic option. Given local concerns outlined under Test 2 there are difficulties in delivering the current approach through the development management system.

Option 7(a) 2: Infill and rounding off for housing. There are no accessibility requirements. Affordable housing is not permitted in inaccessible locations. Off-site affordable housing contributions are sought on market housing.

Summary of Sustainability Appraisal	
-	Having no restrictions on accessibility is likely to increase reliance on the private car. There are also potential detrimental effects to the special qualities of the National Park through the loss of communities and cultural distinctiveness.

Soundness Test 1 Does the Plan fit?	This Policy proposal does not have regard to national planning policy. It is not consistent with plans of neighbouring authorities.
x	

Soundness Test 2 Is the Plan appropriate?	Policy (within the context of national policy for rural areas) is not considered appropriate for the locality as it allows market housing in inaccessible locations and restricts affordable housing in such locations. The Authority could not approve an affordable housing dwelling in a remote location. It does however address key concerns raised locally that affordable housing need should be addressed only in accessible locations.
Soundness Test 3 Will the Plan deliver?	The policy would not be deliverable as it is directly contrary to national planning policy. The Authority will be advised to not progress such a policy to Examination (paragraph 8.2.1.3) of the Local Development Plan Manual.

Option 7(a) 3: Infill and rounding off for affordable housing only.

Summary of Sustainability Appraisal	
-	Whilst the potential benefits to rural communities within the National Park are clear, locating development in inaccessible locations is not sustainable in the long term.

Soundness Test 1 Does the Plan fit?	Policy has regard to national planning policy. It is consistent with plans of neighbouring authorities.
Soundness Test 2 Is the Plan appropriate?	Policy is appropriate for the locality, in so far as it addresses key issues of aiming to meet affordable housing need. Locally however there are concerns that affordable housing would be permitted in inaccessible locations in infill and rounding off opportunities.
Soundness Test 3 Will the Plan deliver?	In relation to infill and rounding off recent viability studies shows that there are a limited number of locations where 50% affordable housing is deliverable in the National Park. The approach is similar to Pembrokeshire County Council's which is affordable housing only as an exceptional land release. Because locally there are concerns that affordable housing would be permitted in inaccessible locations in infill and rounding off opportunities this unlikely to be deliverable through the development management system.

Option 7(a) 4: Development will include the opportunity for **infill and rounding off** for market housing in accessible locations. Off-site affordable housing contributions will be required on such proposals.

Summary of Sustainability Appraisal

+	This option is largely compatible with the Sustainability Appraisal Objectives as it places a requirement for homes built in infill and rounding off opportunities to be in accessible locations, reducing their environmental impacts and making them more socially inclusive for both residents and visitors.
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Soundness Test 1 Does the Plan fit?	Policy has regard to national planning policy. It is also consistent with neighbouring authorities by having regard to national planning policy.
Soundness Test 2 Is the Plan appropriate?	Affordable housing contributions are sought given issues regarding deliverability.
Soundness Test 3 Will the Plan deliver?	There are issues with delivering affordable housing in these types of proposals. This would be a more realistic approach. Seeking affordable housing contributions would be subject to viability testing. See Soundness Test under the Housing Policy/Affordable Housing Policy appraisal.

Option 7(a) 5: New homes in the countryside (Tier 5) will require special justification in the first instance, such as affordable housing to meet local need or rural enterprise dwellings (as per Planning Policy Wales)

Summary of Sustainability Appraisal

++	This option is very similar to Option 1 but with less detail as to the specific requirements on the landscape, as a result it would be slightly less favourable than Option 1 in sustainability terms but is likely to deliver many of the same community benefits.
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Soundness Test 1 Does the Plan fit?	Policy has regard to national planning policy. It is also consistent with neighbouring authorities by having regard to national planning policy.
Soundness Test 2 Is the Plan appropriate?	Affordable housing can be sought for which there is a priority to deliver. The Authority could not require the delivery of a rural enterprise dwelling as it has no evidence of such need

✓	x	except when submitted on a case by case basis. The viability of affordable housing delivery in this manner is uncertain.
Soundness Test 3 Will the Plan deliver?		See above for Test 2. The ability to deliver affordable housing is uncertain.
	x	

Policy 7: COUNTRYSIDE (TIER 5) Infilling and rounding off Overall Summary					
Policy Option	7a)1	7a)2	7a)3	7a)4	7a)5
Sustainability Scoring	++	-	-	+	++
Soundness Test 1	✓	x	✓	✓	✓
Soundness Test 2	x	✓	x	✓	✓ x
Soundness Test 3	x	✓	x	✓	x

Option 1: Delivers the most benefits sustainably by reducing the need to travel, securing affordable housing and helping to sustain community facilities by locating infill development in accessible locations but there are deliverability issues.

Option 2: With no accessibility criteria not performing sustainably and not consistent with national policy.

Option 3: Would mean affordable housing in potentially inaccessible locations. Difficult to deliver given viability issues.

Option 4: Consistent with National Policy and recognises deliverability issues.

Option 5: Consistent with National Policy but there are deliverability issues.

30. Conclusion: In terms of sustainability appraisal Option 7a)1 performs the best followed by Option 7a)5 and then Option 7a)4. There are however practical issues with the implementation of 7a)1 as highlighted in the soundness tests. The approach set out in the Plan is to seek to prioritise affordable housing before market housing is considered in accessible locations which would be consistent with national policy while recognising deliverability issues may arise.

(Policy 7b) rural enterprise dwelling

31. This element of the policy relies on national policy and guidance. No sustainability appraisal or soundness tests have been undertaken.

(Policy 7c) farm diversification

32. Please see sustainability appraisal and soundness tests for Policy 46. Diversification.

(Policy 7d) Conversion of Buildings in the Countryside

33. As advised above elements of Policy 7 Countryside have issues arising which have the potential to affect the spatial strategy of the Plan. With regard to the conversion of buildings in the countryside 4 options for the replacement Plan are considered below in terms of sustainability appraisal and soundness testing.

Option 7d)1: 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.

Summary of Sustainability Appraisal

+	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.
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✓	Soundness Test 1 Does the Plan fit? Policy has regard for the Wales Spatial Plan and also has regard to national planning policy. It is consistent with the plans of neighbouring authorities in that it takes account of reducing the need to travel. It uses accessibility criteria to judge proposals on a case by case basis. The accessibility criteria used through supplementary planning guidance have been upheld on appeal.
✓	Soundness Test 2 Is the Plan appropriate? Policy could be considered appropriate for the locality, in so far as it provides for a range of opportunities although self-catering is precluded in rural locations outside Tenby. There are also concerns whether accessibility needs to be addressed in such a rural location.

Soundness Test 3 Will the Plan deliver?	The Authority has struggled to achieve viability for affordable units on site in conversion opportunities in the countryside and housing associations have issues with taking on the management of such units. Offsite affordable housing contributions where viable would be a more realistic approach. Given local concerns outlined under Test 2 regarding accessibility there are difficulties in delivering the current approach through the development management system.
✓	x

Option 7d)2: it constitutes the conversion of appropriate buildings to a range of uses with affordable housing being given priority in residential conversions. Conversion must not result in unacceptable impacts upon the structure, form, character or setting of the building. The conversion of buildings that are obtrusively located in the landscape will not be permitted. Accessibility to the Centres will be an important consideration.

Summary of Sustainability Appraisal

+	This option is the most compatible with the SA Objectives. Aside from the potential landscape/townscape benefits of conversion the option also prioritises affordable housing (which constitutes the greatest need, and includes accessibility as a key consideration, (which addresses the SA Objectives on climate change and community facilities) whilst allowing for a range of uses for converted buildings.
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Soundness Test 1 Does the Plan fit?	Policy has regard to the Wales Spatial Plan and also has regard to national planning policy. It is consistent with plans of neighbouring authorities in that it takes account of reducing the need to travel. It uses accessibility criteria to judge proposals on a case by case basis The accessibility criteria used through supplementary planning guidance have been upheld on appeal.
Soundness Test 2 Is the Plan appropriate?	Policy is appropriate for the locality, in so far as it addresses key issues of aiming to meet affordable housing need and helping to sustain Rural Centres.
✓	x

Soundness Test 3 Will the Plan deliver?	<p>The Authority has struggled to achieve viability for affordable units on site in conversion opportunities in the countryside and housing associations have issues with taking on the management of such units.</p> <p>Offsite affordable housing contributions where viable would be a more realistic option.</p> <p>Given local concerns outlined under Test 2 there are difficulties in delivering the current approach through the development management system.</p>
✓ ✗	

Option 7d)3: Include the 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.²

Soundness Test 1 Does the Plan fit?	<p>This policy will be consistent with national planning policy as long as the scale of development proposed in countryside locations is limited in nature.</p>
✓	<p>Policy is appropriate for the locality, in so far as it addresses key issues of aiming to meet employment needs.</p> <p>This Authority attempted to prioritise employment-related uses under the Joint Unitary Development Plan and found this difficult to operate. Beyond holiday letting there is little demand for employment-related activities. The Authority could also not rationalise not allowing affordable housing provision as a first option given the need for affordable housing and yet the Authority would allow holiday let (considered to be an employment-related use in the Joint Unitary Development Plan.)</p>
Soundness Test 3 Will the Plan deliver?	<p>Given local concerns outlined under Test 2 there are difficulties in delivering this approach through the development management system.</p>

² 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.

Summary of Sustainability Appraisal

	<p>This option will make it difficult to secure affordable housing.</p> <p>- 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.</p>
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Option 7d)4: conversion of buildings for a variety of uses (housing, holiday let, employment). Off site affordable housing contributions will be sought on market housing developments. No affordable housing can be permitted in inaccessible locations.

Summary of Sustainability Appraisal

	<p>This option will make it difficult to secure affordable housing in more remote locations. There are no accessibility requirements for non-affordable housing developments.</p>
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Soundness Test 1 Does the Plan fit?	<p>In countryside locations, this Policy proposal does not have regard to national planning policy as it precludes the opportunity to provide affordable housing in remote countryside locations.</p>
x	<p>It is not consistent with plans of neighbouring authorities.</p>
Soundness Test 2 Is the Plan appropriate?	<p>Policy (within the context of national policy for rural areas) is not considered appropriate for the locality as it restricts affordable housing in remote rural locations. Opportunities for affordable housing would be more restricted than for other uses. The Authority could not approve an affordable housing dwelling/conversion in a remote location but could approve a holiday let an issue raised in relation to previous Plans by local commentators.</p> <p>It does however address more recent concerns raised locally that affordable housing need should be addressed only in accessible locations.</p>

✓ x

Soundness Test 3 Will the Plan deliver?	<p>Seeking affordable housing on site in the conversion of buildings in the countryside has not proved possible so the possibility of an affordable housing contribution is a more realistic option.</p> <p>The policy would not be deliverable as it is contrary to national planning policy with reference to the exclusion of affordable housing in more remote locations. The Authority is likely to be advised to not progress such a policy to Examination (paragraph 8.2.1.3) of the Local Development Plan Manual.</p>
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Option 7d) 5: In recognition of the positive contribution of that buildings in the countryside can make to the character of the National Park landscape **conversion of buildings** to a variety of uses is also permitted. Affordable housing contributions are required on market dwelling conversions.

Summary of Sustainability Appraisal

-	This option is more compatible with the SA Objectives than option 4 as it allows for more opportunities for affordable housing opportunities, which may help to sustain local communities.
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Soundness Test 1 Does the Plan fit?	<p>This policy will be consistent with national planning policy as long as the scale of development proposed in countryside locations is limited in nature.</p> <p>Historically residential development in countryside locations (both infill and rounding off and conversion have accounted for 22% of housing provided in this National Park (circa 13 dwellings per annum³) This would however would not account for holiday let conversions.</p> <p>Opportunities for the conversion of buildings will gradually reduce over time.</p> <p>Planning Policy Wales Edition 9, November 2016 4.7.4</p> <p>Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car.</p> <p>Technical Advice Note 6 July 2010, paragraph 3.2</p> <p>It is consistent with Pembrokeshire County Council's Local Development Plan with regard to the approach to uses allowed when converting buildings.</p> <p>The Authority can permit conversion opportunities for affordable housing when applied for.</p> <p>Technical Advice Note 23 February 2014 paragraph 3.2.2 would allow the Authority to include a policy that allows for residential conversion (including affordable housing).</p>
?	
Soundness Test 2 Is the Plan appropriate?	<p>It would help retain buildings of character in the countryside which is an appropriate issue to address in the area.</p>
✓	<p>Locally there are concerns that affordable housing would be permitted in inaccessible locations in conversion opportunities. This policy would not require such provision. Affordable housing contributions would be sought instead.</p>
Soundness Test 3 Will the Plan deliver?	<p>There have been issues with delivering affordable housing in conversions in the countryside generally. This would be a more realistic approach.</p> <p>Seeking affordable housing contributions would be subject to viability testing. See Soundness Test under the Housing Policy/Affordable Housing Policy appraisal.</p>

³ See Completions Table Scale and Location of Growth Background Paper.

Policy Option	Option 7d)1	Option 7d)2	Option 7d)3	Option 7d)4	Option 7d)5
Sustainability Appraisal	+	+	-	-	-
Soundness Test 1	✓	✓	✓	x	?
Soundness Test 2	x	✓	x	✓	✓
Soundness Test 3	x	✓	x	✓	✓
Option 1: Generally positive except for self-catering in rural locations. Accessibility issues locally. Deliverability issues. Boundary defining issues.					
Option 2: Generally positive except for accessibility issues locally. Deliverability issues.					
Option 3: Difficult to secure affordable housing. Difficult to deliver.					
Option 4: Difficult to secure affordable housing in more remote locations. Not consistent with national policy.					
Option 5: Allows for more opportunities for affordable housing contributions. It is the option that is most likely to be deliverable.					

34. **Conclusion:** In terms of sustainability appraisal Policy Options 7d)1 and 7d) 2 perform best but have soundness issues regarding deliverability and appropriateness for the local area. Policy Option 7d) 5 performs the best overall across both soundness tests and the sustainability appraisal.

(Policy 7e) Tourist attractions

35. Please see sustainability appraisal and soundness tests for Policy 39 Visitor Economy.

(Policy 7f) Community Facilities

36. Please see sustainability appraisal and soundness tests for Policy 53 Community Facilities and Infrastructure Requirements.

(Policy 7g) One Planet Developments

37. Please see sustainability appraisal and soundness tests for Policy 52 One Planet Developments.

(Policy 7h) New Farm Buildings

38. This element of the policy relies on national policy and guidance. No sustainability appraisal or soundness tests have been undertaken.

(Policy 7i) Employment

39. This element of the policy relies on national policy and guidance. No sustainability appraisal or soundness tests have been undertaken. See also Policy 44 Employment Sites.

(Policy 7j) Exceptional land releases for affordable housing

40. This element of the policy relies on national policy and guidance. No sustainability appraisal or soundness tests have been undertaken. See also Policy 49 Affordable Housing.

(Policy 7k) Exceptional land releases with coastal change management

41. See Policies 36 and 37 Coastal Change Management.

(Policy 7l) Gypsy Traveller Sites

42. See Policy 51

(Policy 7m) Renewable Energy Proposals

43. See Policy 34

Priority A: Special Qualities of the National Park

Plan Policy 8: SPECIAL QUALITIES (Strategy Policy) ★

Overall sustainability Policy 8 Special Qualities

++

The Policy will yield strong sustainability benefits with regard to environmental concerns. There will also be strong benefits in social terms particularly in terms of quality of life and cultural identity.

Soundness Test 1 Does the Plan fit?	The policy aims to safeguard the special qualities of the National Park which are defined in the Pembrokeshire Coast National Park Management Plan.
Soundness Test 2 Is the Plan appropriate?	It is locally specific and is supported by evidence gathered from a variety of sources. The reasoned justification to the Policy refers.
Soundness Test 3 Will the Plan deliver?	The policy has been in operation since the Local Development Plan was adopted and no issues have arisen from its implementation through the Annual Monitoring Reports. The policy is supported by supplementary planning guidance which has also raised no issues through implementation.

Policy 9: Light Pollution

+

The policy will have benefits to the landscape, sense of isolation in the Park and benefits for biodiversity.

Soundness Test 1 Does the Plan fit?	Policy has regard to national planning policy. Planning Policy Wales Edition 9, November 2016, paragraph 13.14.2 Local planning authorities should adopt policies for lighting, including the control of light pollution, in their development plans.
Soundness Test 2 Is the Plan appropriate?	Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky. This policy is intended to protect that and also to relate any lighting proposed to its purpose, such as site security or floodlighting recreational facilities, so that careful design and the use of appropriate means of lighting and lighting levels minimise the impact on adjoining areas. There is also a possibility that light pollution could adversely affect the integrity of a Natura 2000 site

	where development coincides with roost sites/transit routes.
Soundness Test 3 Will the Plan deliver?	The policy has been in operation since the Local Development Plan was adopted and no issues have arisen from its implementation through the Annual Monitoring Reports.
✓	The Authority proposes to also prepare Supplementary Planning Guidance on lighting.

Policy 10 Sites and Species of European Importance

Not appraised as this policy reflects the legislative requirements of the Conservation of Habitats and Species Regulations.

Policy 11 Nationally Protected Sites and Species

Not appraised as this policy reflects the legislative requirements of the Conservation of Habitats and Species Regulations.

Policy 12: Local Sites of Nature Conservation or Geological Interest

Overall sustainability Policy 12 Local Sites of Nature Conservation or Geological Interest

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The Policy is likely to deliver significant sustainability gains, particularly with regard to biodiversity. However, the sustainability of this policy will depend to a large extent on how the relative importance of the conservation site and the development is judged, and how effectively alternative sites for development are sought.

Soundness Test 1 Does the Plan fit?

Paragraph 5.3.11 of Planning Policy Wales Edition 9, November 2016 advises that non-statutory designations should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. Such designations should not unduly restrict acceptable development. The evidence supporting the use of Policy 12 is set out in the reasoned justification and the policy wording seeks to strike a balance between the value of the site and the importance of the development.

✓

Soundness Test 2 Is the Plan appropriate?

It is locally specific and is supported by evidence from relevant experts. The approach is reasonable by balancing the value of the site against the importance of the development.

✓

Soundness Test 3 Will the Plan deliver?	The policy has been in operation since the Local Development Plan was adopted in 2010 and no issues have arisen from its implementation through the Annual Monitoring Reports. The policy is also supported in part by supplementary planning guidance on Regionally Important Geodiversity Sites which has also raised no issues through implementation. The intention is to carry forward this guidance and refresh it under the replacement Local Development Plan. The Authority is also intending to prepare Supplementary Planning Guidance on Biodiversity under the replacement Local Development Plan.
✓	

Policy 13: Protection of Biodiversity

Overall sustainability Policy 13 Protection of Biodiversity	
++	Overall the policy performs well against the SA Objectives particularly 1 and 14, which concern biodiversity directly. Further benefits are likely through the ecosystem services that would be maintained for agriculture, tourism and climate change. In addition the wildlife and habitats of the National Park are an intrinsic part of its landscape.
Soundness Test 1 Does the Plan fit?	Paragraph 5.3.11 of Planning Policy Wales Edition 9, November 2016 advises that Non-statutory designations should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. Such designations should not unduly restrict acceptable development. The evidence supporting the use of Policy 13 is set out in the reasoned justification and the policy wording seeks to strike achieve a solution where effects can be mitigated.
✓	It is locally specific and is supported by the Local Biodiversity Action Plan.
Soundness Test 2 Is the Plan appropriate?	
✓	
Soundness Test 3 Will the Plan deliver?	The policy has been in operation since the Local Development Plan since 2010 was adopted and no issues have arisen from its implementation through the Annual Monitoring Reports. The Authority is also intending to prepare Supplementary Planning Guidance on Biodiversity under the replacement Local Development Plan.
✓	

Policy 14: Welsh Language

Overall sustainability Policy 14 Welsh Language	
+?	The policy is compatible with the relevant SA Objectives and may

	have minor beneficial effects.
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Soundness Test 1 Does the Plan fit?	The policy and reasoned justification has been written to comply with national planning policy including the recently published Technical Advice Note 20 Welsh Language October 2017.
✓	
Soundness Test 2 Is the Plan appropriate?	The reasoned justification to the policy sets out the areas where the policy will apply. The areas identified as important for the Welsh language have been identified in previous Plans and updated for this Plan.
✓	
Soundness Test 3 Will the Plan deliver?	The policy reflects advice in national planning policy. It is one which will come into play only in certain unique circumstances and therefore its use is likely to be very limited.
?	

Policy 15: Protection of Buildings of Local Importance

Overall sustainability Policy 15 Protection of Buildings of Local Importance	
+	The policy is likely to prove positive with regard to Sustainability Objectives relating to the landscape and townscapes of the National Park.

Soundness Test 1 Does the Plan fit?	Paragraph 4.11.10 of Planning Policy Wales Edition 9, November 2016 advises that in areas recognised for their landscape, townscape or historic value, such as National Parks, with an established and distinctive design character, it can be appropriate to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important. Paragraph 5.3.6 In National Parks and AONBs, development plan policies and development management decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.
✓	
Soundness Test 2 Is the Plan appropriate?	It is locally specific relying on the contribution that local buildings make to this National Park. The approach is reasonable by having due regard to the difference status between buildings of local importance and those that are statutorily listed.
✓	
Soundness	The policy has been in operation since the Local Development

Test 3 Will the Plan deliver?	Plan was adopted in 2010 (and the previous Plan) and no issues have arisen from its implementation through the Annual Monitoring Reports.
✓	

Policy 16: Conservation of the Pembrokeshire Coast National Park

Overall sustainability Policy 16 Conservation of the Pembrokeshire Coast National Park	
+	Overall the policy performs well against the SA Objectives.

Soundness Test 1 Does the Plan fit?	<p>Paragraph 4.11.10 of Planning Policy Wales Edition 9, November 2016 advises that in areas recognised for their landscape, townscape or historic value, such as National Parks, with an established and distinctive design character, it can be appropriate to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important.</p> <p>Paragraph 5.3.6 In National Parks and AONBs, development plan policies and development management decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.</p>
✓	It is locally specific relying on the special qualities of this National Park and how they should be safeguarded.
✓	Soundness Test 3 Will the Plan deliver?
✓	The policy has been in operation since the Local Development Plan was adopted (and in previous Local Plans) and no issues have arisen from its implementation through the Annual Monitoring Reports. The policy is also supported in part by supplementary planning guidance on landscape and seascape character which will be carried forward under the replacement Local Development Plan.

Policy 17 Open Space and Green Wedges

44. A sustainability appraisal has not been done on this policy which simply cross refers to the Proposals Map and the need to provide open space (cross referring to Policy 53). The policy framework for Green Wedges is set out in National Planning Policy. A sustainability appraisal was

however carried out regarding the approach to take when identifying Green Wedges. Two options were considered:

- Option 1: To continue with the green wedges identified within the existing Local Development Plan, or to:
- Option 2: Review the need for, and the extent of green wedges within the Local Development Plan.

45. The second option was chosen as the preferred option.

Policy 17 Green Wedges element		
Policy Option	1	2
Sustainability Scoring	0	+?
Option 1: This option would not accord with the review of green wedges set out at paragraph 4.8.10 onwards of Planning Policy Wales Edition 9 November 2016. Option 2: 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 genuine opportunities for new development if needlessly designated.		

<p>Soundness Test 1 Does the Plan fit?</p>	<p>Open Space: Planning Policy Wales Edition 9 November 2016 11.2.3 The development plan should protect from development playing fields and open space that has significant amenity or recreational value to local communities.</p> <p>The following paragraphs contain statements of national development management policy which should not need to be repeated as local policy in LDPs: 11.1.11 Formal and informal open green spaces, including parks with significant recreational or amenity value, should be protected from development, particularly in urban areas where they fulfil multiple purposes, not only enhancing the quality of life, but contributing to biodiversity, the conservation of nature and landscape, air quality and the protection of groundwater. Such open spaces also have a role in climate protection and in enabling the adaptation of urban areas to the impacts of climate change, for example by contributing to flood management and helping to reduce urban heat island effects.</p> <p>Green Wedge: 4.8.1 Around towns and cities there is often the need to protect open land. Local planning authorities need to consider establishing Green Belts and making local designations, such as green wedges. Both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of spatial forms.</p> <p>4.8.11 Like Green Belts, green wedges should be established through development plans.</p> <p>Local planning authorities should only maintain green wedges where they can demonstrate that normal planning and development management policies cannot provide the necessary protection. They should state in their development plans the areas that require extra protection and why.</p> <p>The following paragraphs contain statements of national development management policy which should not need to be repeated as local policy in LDPs: 4.8.5, 4.8.12, 4.8.14-4.8.18 Development control in Green Belts and green wedges</p>
<p>✓</p> <p>Soundness Test 2 Is the Plan appropriate?</p>	<p>Open Space: The open space designations shown on the Proposals Map (to be identified at Deposit Stage) rely on an Open Space Assessment prepared for the current Local Development Plan and updated for the replacement Plan (August 2016) in accordance with national planning policy. The protection of open space relies on the development control policy set out in national planning policy. Requirements for Open Space provision are set out in Policy 53.</p> <p>Green Wedge: The Authority prepared a Green Wedge Background Paper for the current Local Development Plan in accordance with national planning policy and this has been updated for the replacement Local Development Plan. Green Wedges will be shown on the Deposit Local Development Plan Proposals Map.</p>

Soundness Test 3 Will the Plan deliver?	Open Space: Loss of open space is monitored by a Welsh Government Core Indicator in the current Local Development Plan which will be carried over into the replacement Local Development Plan. No issues have arisen under the Annual Monitoring Reports for the current Local Development Plan 2012 to 2015. Green Wedges: No issues have arisen since the green wedges were first adopted. No changes are proposed, there has been no significant change in national planning policy or upon the specific context of each of the sites to warrant any change to the LDP or Green Wedge designations.
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Policy 18: Shore Based Facilities *

Overall sustainability Policy 18 Shore Based Facilities	
+	Protects the undeveloped coast from development and maintains the character of coastal settlements.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9, November 2016, 5.6.3. Local planning authorities should clearly establish what the coast means for them and develop, or apply, specific policies which reflect the characteristics of their coastlines. 5.7.1 In preparing their development plans local planning authorities will be expected to take into account other plans and policies with implications for the coastal area. They will need to consider landward and seaward pressures.
Soundness Test 2 Is the Plan appropriate?	The reasoned justification to the policy sets out the context to the policy and the rationale for the taken taking account of national policy and other evidence such as the Renewable Energy Assessment carried out for the National Park.
Soundness Test 3 Will the Plan deliver?	No issues have arisen with the operation of the policy which has been included in the adopted Local Development Plan.

Policy 19: Porthgain, Saundersfoot, Solva and Tenby Harbours *

Overall sustainability Policy 19 Porthgain, Saundersfoot, Solva and Tenby Harbours	
+	Will maintain the distinctiveness of harbour communities and help maintain vitality.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9, November 2016, 8.5.2: Development plans should also include policies and proposals relating to the development of other transport infrastructure and related services (such as public transport interchange facilities, rail facilities, harbours and airports) including safeguarding zones.
Soundness Test 2 Is the Plan appropriate?	The reasoned justification to the policy sets out the context to the policy and the rationale for the approach taken.
Soundness Test 3 Will the Plan deliver?	No issues have arisen with the operation of the policy which has been included in the current Local Development Plan.

Priority B: Major Development Potential for Growth

Paragraph on Ministry of Defence ★

46. Two options were considered for Ministry of Defence developments:

- **Option 1:** 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).
- **Option 2:** 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.

47. Option 1 was considered to be the most sustainable option and has been taken forward in the Plan.

Ministry of Defence		
Policy Option	1	2
Sustainability Scoring	+	-
Option 1: This option contributes more to the sustainability objectives. 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. Option 2: 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.		

Soundness Test 1 Does the Plan fit?	The Ministry of Defence has been contacted to ensure that the approach set out in the adopted Local Development Plan is appropriate and there are no updates to the Ministry's long term plans for its properties in the National Park. The Ministry of Defence raised no issues with the approach set out. The approach also acknowledges the application of the major development test in National Parks under certain circumstances as set out in national planning policy.
Soundness Test 2 Is the Plan	See above.

appropriate?	
✓	
Soundness Test 3 Will the Plan deliver?	This policy approach has been included in the current Local Development Plan. No issues have arisen with regard to its operation.
✓	

Policy 20: Hazardous Installations

Overall sustainability Appraisal of Policy 20 Hazardous Installations	
0	The policy is not relevant to the sustainability framework developed for the Local Development Plan. However, it is necessary for public protection.

Soundness Test 1 Does the Plan fit?	Paragraph 7.5.1 of Planning Policy Wales Edition 9 November 2016 advises that Development plans should identify protection zones around establishments that hold hazardous substances and protect the ability of existing establishments to operate or expand by preventing the incremental development of vulnerable uses in the vicinity of such sites.
Soundness Test 2 Is the Plan appropriate?	There are several such establishments which impact on the National Park area and need to be taken account of. Safeguarding zones will be shown on the Constraints Map at Deposit Stage.
Soundness Test 3 Will the Plan deliver?	This policy has been included in the current Local Development Plan and the previous Joint Unitary Development Plan for Pembrokeshire. No issues have arisen with regard to the policy's operation.

Policy 21: SCALE OF GROWTH (Strategy Policy) ★

Overall sustainability Appraisal of Policy 21 Scale of Growth	
+	It is inevitable that some negative impacts will arise from development particularly through increased use of resources and increased travel (with associated greenhouse gas emissions). On the whole the policy aims to work within the requirements National Park designation and respect environmental limits. There is good potential for benefits to communities within the National Park as the Policy aims to meet employment and housing needs but do so at a scale that helps to maintain community distinctiveness. However, the policy lacks a direct

	mention of how community facilities will be maintained or enhanced alongside this although this is addressed through Policy 53 Community Facilities & Infrastructure Requirements. In addition how development is located is not included in this policy but is covered by National Policy alongside other policies of the Plan.
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Soundness Test 1 Does the Plan fit?	<p>The approach overall ensures compliance with the Environment Act 1995 which requires compatibility with the national park designation (See Policy 1 also).</p> <p>Looking at development types in turn in terms of those most likely to impact strategically in terms of growth the approach does fit. Strategically in the Wales Spatial Plan larger growth areas (hubs) are designated outside the National Park.</p> <p>In terms of housing, growth is not anticipated as a result of a declining population forecast. Focus is on enabling affordable housing delivery for the local population. Market housing is needed to cross subsidise delivery. Policy 47 and 49 advises.</p> <p>Employment provision is small scale (less than 2 hectares) as more strategic hubs are identified outside the National Park area consistent with the Wales Spatial Plan and the approach set out in neighbouring Local Development Plans.</p> <p>The landscape sensitivity and capacity study for renewable energy has resulted in potential primarily for small scale developments. Some medium scale proposals may be possible also. There are extremely limited opportunities for large scale</p>
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proposals. Policy 34 advises.

The Authority's landscape sensitivity and capacity study for camping and caravanning advises that there is a need to conserve existing unspoilt landscapes and seascapes and enhance existing caravan and camping sites, with limited opportunities for expansion or new sites.

National Planning policy advises that minerals development should not take place in National Parks save in exceptional circumstances (paragraph 14.3.2).

National planning policy for waste acknowledges that facilities should predominantly serve the National Park area. – See Waste Background Paper.

For coastal development national policy recommends the expansion of marina capacity outside the National Park (see the Welsh Coastal Tourism Strategy published in December 2008).

For retail the strategy for Tenby, Saundersfoot, St Davids and Newport is to maintain their position relative to one another and larger centres outside the area. Despite leaking spend to centres outside the Park area they are performing well with the support of resident and visitor spend. It is proposed to encourage the sympathetic regeneration of these Centres so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities. The Regional Retail Study for South West Wales supports this approach with no need to allocate further retail opportunities. National policy and local criteria based policies to address proposals if received.

✓	Soundness Test 2 Is the Plan appropriate?	See above.
✓	Soundness Test 3 Will the Plan deliver?	Each element of the policy has a more detailed policy to enable delivery. Please see tests of soundness for each.

Policy 22: Minerals Safeguarding

Overall sustainability Appraisal of Policy 22 Minerals Safeguarding	
+	The policy is a requirement of National planning policy which requires the safeguarding of certain key mineral resources. Extracting minerals from land that will be developed anyway can be regarded as a sustainable approach, effectively getting two

	uses from the same piece of land where extraction would be environmentally acceptable and economically and technically feasible.
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Soundness Test 1 Does the Plan fit?	Safeguarding: 14.2.1 of Planning Policy Wales Edition 9 November 2016: It is important that access to mineral deposits which society may need is safeguarded. This does not necessarily indicate an acceptance of mineral working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered. 14.7.3 Areas to be safeguarded should be identified on proposals maps and policies should protect potential mineral resources from other types of permanent development which would either sterilise them or hinder extraction, or which may hinder extraction in the future as technology changes.
Soundness Test 2 Is the Plan appropriate?	See above in particular the reference to non-acceptance of mineral workings.
Soundness Test 3 Will the Plan deliver?	This policy approach has been included in the current Local Development Plan. No issues have arisen with regard to its operation. The Authority has also published supplementary planning guidance in support of the policy. No issues have arisen with its operation. ⁴

Policy 23: Buffer Zones

48. A sustainability appraisal has not been done on this policy which simply cross refers to the Proposals Map. The policy framework is set out in National Planning Policy.

Soundness Test 1 Does the Plan fit?	Buffer Zones: Paragraph 14.4.1 of Planning Policy Wales Edition 9 November 2016: There is often conflict between mineral workings and other land uses as a result of the environmental impact of noise and dust from mineral extraction and processing
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<http://www.pembrokeshirecoast.org.uk/Files/files/Dev%20Plans/AdoptedSPG/SafeGuardingSPGTechUpdateTrackChCompleteJun14.pdf>

✓	and vibration from blasting operations. 14.7.16 To avoid conflict between mineral workings and other land uses buffer zones should be identified around existing or proposed minerals sites.
Soundness Test 2 Is the Plan appropriate?	There are minerals sites in the National Park that require buffer zones to be defined.
✓	
Soundness Test 3 Will the Plan deliver?	This policy approach is set out in national planning policy and supporting technical advice notes. The approach has been included in the current Local Development Plan. No issues have arisen with regard to its operation.
✓	

Policy 24: Borrow Pits *

Overall sustainability Appraisal of Policy 24 Borrow Pits	
+	Overall this policy performs well against the SA Objectives particularly objectives concerned with landscape and townscape.

Soundness Test 1 Does the Plan fit?	Borrow Pits: Planning Policy Wales Edition 9 November 2016 paragraph 14.8.23 advises that Borrow Pits are temporary mineral workings operated to supply particular construction projects, usually highway contracts. Major contracts may require the supply of large quantities of minerals as engineering fill over a short timescale which may cause significant environmental impact and disturbance to local communities. National planning policy further advises that there is no need to repeat national policy in Local Development Plans. The policy is included in the Local Development Plan because a tailored approach to how Borrow Pits will be considered in this National Park is needed.
✓	
Soundness Test 2 Is the Plan appropriate?	See above under Test 1.
✓	
Soundness Test 3 Will the Plan deliver?	The approach has been included in the current Local Development Plan. No issues have arisen with regard to its operation.
✓	

Policy 25: Local Building Stone

Overall sustainability Appraisal of Policy 25 Local Building Stone
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+	Due to the criterion to avoid environmental damage, the requirement that any sites opened under this policy are less damaging than existing sites or alternative sources, and the requirement for beneficial after-use, the policy is likely to be positive in sustainability terms.
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Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 paragraph 14.3.2 states that mineral working in National Parks should only take place in exceptional circumstances. In some cases this may relate to the need for small scale mineral extraction from local workings for building stone, which are not otherwise available and which can be extracted without unacceptable adverse impacts.
✓	The use of locally derived building materials is supported so as to encourage the promotion of design quality which respects vernacular traditions.
Soundness Test 2 Is the Plan appropriate?	

Policy 26: Recycled, Secondary and Waste Materials

49. Overall sustainability Appraisal of Policy 26 Recycled, Secondary and Waste Materials

+	The policy facilitates recycling and as such performs well against the SA objectives. Criteria in the policy will prevent unwanted negative impacts, particularly on nearby communities and the immediate environment.
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Soundness Test 1 Does the Plan fit?	14.8.10 Planning Policy Wales Edition 9 November 2016 advises that in order to conserve natural resources, particular emphasis should be given to increasing the use of alternative products to primary materials where appropriate.
✓	The policy provides a policy approach to allow the use of such materials from sites.
Soundness Test 2 Is the Plan appropriate?	

Plan deliver?	Plan without any issues arising in relation to its operation.
✓	

Policy 27: Inactive Mineral Sites

Overall sustainability Appraisal of Policy 27 Inactive Minerals Sites	
+	Though this policy does not impact on many of the Sustainability Objectives, for those to which it is relevant it is positive, mainly through ensuring that the landscape and biodiversity value of former quarries is maintained.
Soundness Test 1 Does the Plan fit?	Inactive Sites: Paragraph 14.7.14 of Planning Policy Wales Edition 9 November 2016 advises that inactive sites with planning permission for future working which are considered unlikely to be reactivated for the foreseeable future should be identified in the development plan and should be the subject of a suitable strategy and associated policies to explain future proposals for the land. The strategy should outline the authority's overall approach to such sites and the policies should seek to deliver that vision.
Soundness Test 2 Is the Plan appropriate?	The policy's reasoned justification sets out an approach appropriate for the local area. The reasoned justification also refers to location specific supplementary planning guidance for land instability arising from coal minerals working.
Soundness Test 3 Will the Plan deliver?	The Prohibition Order for Penberry has been submitted for confirmation so the Authority's approach to implementation has yet to be tested. No issues have arisen with the operation of the supplementary planning guidance which has been in place since June 2011.

Policy 28: Local Waste Management

Overall sustainability Appraisal of Policy 28 Local Waste Management	
+	Local waste facilities within the National Park would help to reduce the negative impacts of waste, and would have less of an impact on landscape and townscape.
Soundness Test 1 Does the Plan fit?	The approach set out follows the policy and guidance set out in a series of documentation. The introductory paragraph to the Waste Section advises.

Soundness Test 2 Is the Plan appropriate?	The approach set out recognises the role of this National Park area in the delivery of local waste management facilities within the context of National Policy and the geography of the National Park in a local context.
Soundness Test 3 Will the Plan deliver?	There are no specific allocations identified in this policy. The criteria of the Policy aim to facilitate provision where needed to predominantly serve the National Park area and to ensure such provision is environmentally acceptable.

Policy 29: Composting *

Overall sustainability Appraisal of Policy 29 Composting	
++	Composting at a local scale is likely to represent a sustainable way of dealing with suitable waste.
Soundness Test 1 Does the Plan fit?	The approach set out follows the policy and guidance set out in a series of documentation. The introductory paragraph to the Waste Section advises.
✓	
Soundness Test 2 Is the Plan appropriate?	The approach set out recognises the role of this National Park area in providing opportunities for composting within the context of National Policy and the geography of the National Park in a local context.
✓	
Soundness Test 3 Will the Plan deliver?	The policy has been in the adopted Local Development Plan (September 2010).
✓	

Priority C: Climate Change, Sustainable Design, Flooding, Sustainable Energy

Policy 30 SUSTAINABLE DESIGN (Strategy Policy) ★

50.5 policy options were considered for

- Option 1 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 2: Require all new dwellings and other new buildings to achieve BREEAM/EcoHomes "Excellent" rating
- Option 3: Set energy and resource standards for particular types of development
- Option 4: Leave Building Regulations to deal with energy and other resource standards, intervening only in the case of stricter energy targets for larger scale schemes
- Option 5: Leave the WG 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.

Policy Option	Option 1	Option 2	Option 3	Option 4	Option 5
Sustainability Appraisal	++	++	++	+	++

Option 1: Will help reduce the factors contributing to climate change although the additional 25% reduction may be onerous in many development schemes. There is uncertainty over the economic viability of increased build and sale costs being offset by reduced running costs for the completed building. The additional requirement may therefore be counterproductive.

There is no national policy context for specific requirements by development type, that are over and above national standards.

Option 2: Will help reduce the factors contributing to climate change although the additional requirements may be onerous in many small scale development schemes. There is uncertainty over the economic viability of increased build and sale costs being offset by reduced running costs for the completed building. The additional requirement may therefore be counterproductive.

There is no national policy context for specific requirements by development type that are over and above national standards.

Option 3: Will help reduce the factors contributing to climate change although the additional requirements may be onerous in many small scale development schemes. There is uncertainty over the economic viability of increased build and sale costs being offset by reduced running costs for the completed building. The additional requirement may therefore be counterproductive.

Policy Option	Option 1	Option 2	Option 3	Option 4	Option 5
There is no national policy context for specific requirements by development type, that are over and above national standards.					

Option 4: A positive contribution to meeting SA objectives, but potentially lower than in the more proactive alternative options. This option would comply with national policy where larger scale schemes relate to additional requirement for strategic sites.

Option 5: The WG standards refer to Building Regulations for carbon reduction and energy efficiency. This option would allow for additional requirements on strategic sites. The requirement for solar panels may be unreasonable in some proposals.

51. Options 1, 2, 3 and 5 scored best in terms of the sustainability appraisal but in terms of the soundness tests, in particular compliance with national planning policy, and deliverability Option 4 has been chosen as the preferred option.

52. Two options were also explored for achieving energy efficiency improvements:

- **Option 1:** Where appropriate require energy efficiency improvements in the original building as well as in the extension, etc for which permission has been sought.
- **Option 2:** Distribute energy awareness literature to applicants for extensions and other householder development.

53. Both options score positively in the sustainability appraisal but having pursued the first option under the current Local Development Plan this has proved undeliverable and is proposed for deletion from the replacement Local Development Plan. The second option does not require a policy to be included in the Local Development Plan.

Energy Efficiency		
Policy Option	1	2
Sustainability Scoring	+	+
Option 1: Would give gains relating to energy use and carbon footprint, but could also compromise the ability of households and public buildings to meet changes in their needs. Such a policy approach for households has proved unworkable in the current Local Development Plan. There is no national planning policy context for the implementation of such a policy for householders or commercial buildings. Option 2: 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 3rd party literature available. Such considerations need to be included from the outset of the design stage and so the application stage may be too late to influence significantly. Would putting such literature in with energy and water bills be more effective - offer an opportunity to		

save, rather than spend, money

Overall sustainability Appraisal of Policy 30 Sustainable Design

+

Overall this policy is likely to contribute positively to the SA Objectives, particularly those that focus on the management of natural resources and the causes and consequences of climate

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 refers to the national planning policy statements to be considered for inclusion in topic-based policies (paragraphs 4.11.1 to 4.11.16 provides national planning policy statements on design considerations). It also refers to the use of supplementary planning guidance which has been prepared to support the policy.
Soundness Test 2 Is the Plan appropriate?	The policy is appropriate for the area. It derives from national planning policy and extensive work done by the Authority with Brecon Beacons and Snowdonia when a 3 Parks Guide to Design was prepared in 2007. Extensive consultations with stakeholders and study visits took place and consultation. The guide is now supplementary planning guidance to the 1 st Local Development Plan.
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan. Issues arising from implementing that element of the policy which required improvements to the main house where extensions were proposed has resulted in that element of the Policy being deleted in the replacement Plan. The remainder of the Policy has not resulted in issues arising during its operation.

Policy 31: Amenity

Overall sustainability Appraisal of Policy 31 Amenity

+

The policy is appropriate in sustainability terms, particularly in the context of the first National park purpose.

Soundness Test 1 Does the Plan fit?	Policy is a development control policy for the protection of amenity. Planning Policy Wales Edition 9 November 2016 paragraph 3.1.4. A major concern in all development control is amenity and the policy sets out the framework for assessing this.
Soundness Test 2 Is the Plan	The policy is appropriate for the area.

appropriate?	
✓	
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan and its predecessor the Joint Unitary Development Plan. No issues have arisen with the policy's implementation over that time period (from 2006).
✓	

Policy 32: Minimising Waste

Overall sustainability Appraisal of Policy 32 Minimising Waste	
+	Generally steps to minimise waste and deal with it locally are likely to deliver sustainability gains, however the effect of dealing with waste locally could be simply to spread the negative effects more thinly if local waste management is not controlled as effectively as a larger scale facility would be.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 paragraph 4.4.3 and 4.11.5 and 12.6.3 refers to including policies to cover this issue.
✓	
Soundness Test 2 Is the Plan appropriate?	This general policy approach is particularly appropriate for the area given its benefits to the landscape etc.
✓	
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation over that time period (from 2010).
✓	

Policy 33: Surface Water Drainage

Overall sustainability Appraisal of Policy 33 Surface Water Drainage	
+	The policy will have positive sustainability outcomes by helping prevent flooding and pollution.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 paragraph 4.12.3 refers.
✓	
Soundness Test 2 Is the Plan	This general policy approach is appropriate for the area.

appropriate?	
✓	
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation over that time period (from 2010).
✓	

Policy 34 RENEWABLE ENERGY (Strategy Policy) ★

54.4 policy options were considered:

- Option 1: 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 2: Encourage on site renewable energy development at an appropriate scale where community schemes have already been explored.
- Option 3: Encourage small scale community based renewable energy development, but retain tight control over the location and design of larger scale development
- Option 4: To contribute to the development of alternative energy sources through the marine environment.

Policy Option	Option 1	Option2	Option 3	Option 4
Sustainability Appraisal	+	+	+	+?

Option 1: Renewable energy schemes are likely to contribute positively to a more sustainable society. In a 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 larger scale developments that might generate significant amounts of renewable energy but cause more significant detrimental impacts.

Option 2: 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. The requirement to explore community based schemes in the first instance may prove unworkable.

Option 3: 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. Community

Policy Option	Option 1	Option2	Option 3	Option 4
based schemes by their nature are generally larger in scale than individual schemes and so there may be limited opportunities to encourage this within the National Park.	Option 4: 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.			

55. The sustainability appraisal outcomes do not differ substantively except for Option 4 where the marine effects are unknown.

Overall sustainability Appraisal of Policy 34 Renewable Energy	
+	Renewable energy schemes are likely to contribute positively to a more sustainable society. In a 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 larger scale developments that might generate significant amounts of renewable energy but cause more significant detrimental impacts.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 paragraph 12.8.9 (refers to enabling provision of renewable energy through Local Development Plans). Option 1 is the most compliant where policy is based on a Renewable Energy Assessment outcomes.
Soundness Test 2 Is the Plan appropriate?	Option 1 policy approach is appropriate for the area. The approach is based on a detailed assessment of landscape capacity for the various forms of renewable energy provision. This detailed assessment forms supplementary planning guidance to the current Local Development Plan. Revised targets for the monitoring section of the replacement Local Development Plan have also been provided.
Soundness Test 3 Will the Plan deliver?	Option 1 policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation (and supporting guidance) over that time period (from 2010).

Policy 35 FLOODING & COASTAL INUNDATION (Strategy Policy)

Overall sustainability Appraisal of Policy 35 Flooding & Coastal Inundation

+?	Over the long term the aim of the policy is to ensure the National Park is managed to ensure that development is directed away from areas of flooding and coastal inundation and where practicable sustainably defend the coast.
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Soundness Test 1 Does the Plan fit? ✓	The policy is compliant with national planning policy and the relevant shoreline management plans.
Soundness Test 2 Is the Plan appropriate? ✓	This general policy approach is appropriate for the area. Assessments of individual applications will be based on the advice maps provided and or the relevant Shoreline Management Plan.
Soundness Test 3 Will the Plan deliver? ✓	This policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation over that time period (from 2010).

Policy 36 Development in the Coastal Change Management Area (New Policy)

Overall sustainability Appraisal of Policy 36 Development in the Coastal Change Management Area

+	The policy aims to direct development away from areas at risk of flooding and ensure that existing flood risk is not increased. In doing so the policy will help to ensure that coastal communities within the National Park are more resilient to the effects to climate change.
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Policy 37 Relocation of existing permanent dwellings affected by coastal change (New Policy)

Overall sustainability Appraisal of Policy 37 Relocation of existing permanent dwellings affected by coastal change (New Policy)

+	By allowing the relocation of existing homes that are at risk from flooding or coastal erosion the policy will help to sustain coastal communities within the National Park. There is also good potential for biodiversity gain from this policy.
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Policy 38 Relocation and replacement of development (other than residential) affected by coastal change (New Policy)

Overall sustainability Appraisal of Policy 38 Relocation and replacement of development (other than residential) affected by coastal change (New Policy)

+

The Sustainability Appraisal suggested that there could be a positive effect against Sustainability Appraisal Objective 3 (landscape/townscape) if the policy included a criterion like e) from Policy 37. This criterion has been added as c). Not further changes to the policy are suggested.

Soundness Tests for Policies 36, 37, 38

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 5.6.3 refers to 'Areas subject to constraints or considered unsuitable for development may include those where..... there may be risks of erosion, flooding or land instability.'
Soundness Test 2 Is the Plan appropriate?	The policy approach is appropriate for the area. It is derived from approaches tested elsewhere but tailored to suit this location.
Soundness Test 3 Will the Plan deliver?	This policy approach is being tested for the first time in this Plan.

Priority D: Visitor Economy, Employment

Policy 39: VISITOR ECONOMY (Strategy Policy) ★★★

56. **Caravan camping and chalet development:** Two policy options were considered for Policy 39a) which deals with caravan camping and chalet development:

- Option 1 (existing Local Development Plan policy): Not allowing any additional camping, caravanning or chalet pitches in the National Park. Allowing upgrading of tent pitches to touring caravan pitches provided that one third of total pitches remains for tents. 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 (i.e. the current Local Development Plan Policy).
- Option 2: Allowing limited caravan, camping and chalet development, including site extensions and change from camping to touring and static caravan pitches, in defined locations.

57. Option 1 is the preferred policy option in sustainability appraisal terms. However, this long-held policy of restraint required review in terms of the soundness tests, in particular to ensure the evidence base was robust. A consultant was commissioned to assess the capacity of the National Park landscape to absorb additional chalet, caravan and camping sites and pitches. The outcome of the Assessment (the Caravan, Camping and Chalet Landscape Capacity Assessment), which was published with the Review Report forms the basis for the policy set out above. Looking across the soundness tests and the sustainability appraisal Option 2 is the preferred option.

Policy 39a): Visitor Economy - Sustainability Appraisal Summary		
Policy Option	39a)1	39a)2
Sustainability Scoring	+	+/-
Option 1 was likely to realise landscape benefits in terms of more appropriately designed and sited structures. Also likely to offer better opportunities for year round tourism.		
Option 2 The policy option provides for less protection of the landscape and is likely to increase climatic factors such as waste and energy use. However, it provides for more community and employment benefits than option 1 as a tradeoff.		

58. **Hotels and guest houses:** Five policy options were considered regarding hotels and guest houses (Policy 39c).

- Option 1: Protect against loss of all hotels and guest houses.

Alternative Options & Appraisal Background Paper March 2018

- Option 2: 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 3: Protect against the loss of hotels and guesthouses in the Tenby Tourism Growth area.
- Option 4: Allow conversion of hotels and guesthouses.
- Option 5: Allow for the provision of and protect against loss of all hotels and guest houses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality.

59. Option 5 is the preferred option as it provides for both the provision of and protection of hotels and guesthouses.

	Policy 39c): Visitor Economy - Sustainability Appraisal Summary				
Policy Option	39c)1	39c)2	39c)3	39c)4	39c)5
Sustainability Scoring	+	+	-	--	+
Option 1: Whilst this option is generally compatible with the SA Objectives in its aims it could ultimately result in the loss of serviced accommodation. May result in damage to townscapes through deterioration of important buildings when the current use is no longer viable.					
Option 2: Option least likely to result in the loss of serviced accommodation, with attendant negative effects.					
Option 3: More likely to result in loss of serviced accommodation, with attendant effects than option 2.					
Option 4: Could result in extensive loss of serviced accommodation with negative effects on settlement character and employment.					
Option 5: Policy performs well against the relevant SA Objectives, no changes suggested.					

45. 6 options were considered for self catering proposals (Policy 39d):

- Option 1: Outside the Tenby Tourism Growth Area do not permit any further self-catering accommodation in the National Park.
- Option 2: Do not permit any further self-catering accommodation in the National Park.
- Option 3: Allow self -catering in conversions in the countryside and on brownfield sites in defined centres
- Option 4: 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 5: Allow self catering in conversions in the countryside.
- Option 6: Allow self-catering only on brownfield sites in Centres or

through conversion proposals in the countryside where the site or buildings is not appropriate for market or affordable housing provision.

60. Option 4 and Option 6 score the highest in the sustainability appraisal.

However, issues have arisen regarding the deliverability of Option 4 (currently used in the Local Development Plan) which are covered in detail under Policy 7 Countryside. In terms of the Plan's key aim to address affordable housing need and the importance of achieving deliverability Option 6 is the preferred option.

Policy 39d): Visitor Economy - Sustainability Appraisal Summary						
Policy Option	39d)1	39d)2	39d)3	39d)4	359d)5	39d)6
Summary Score	+	-	-/+	++	0	++
Option 1: Limits self-catering to a certain of the Park without taking into account community priorities.						
Option 2: Limits self-catering but fails to prioritise use of sites for affordable housing which is a priority to sustain communities.						
Option 3: This policy would maximise opportunities for self-catering development but with no regard for affordable housing which is a priority to sustain communities.						
Option 4: Gives priority to affordable housing whilst allowing more self-catering provision.						
Option 5: The benefits of self-catering development communities are limited to the countryside. Affordable housing need is not considered.						
Option 6: Maximises opportunities for affordable housing provision whilst allowing for self-catering developments benefitting communities, the environment and economy.						

61. Visitor attractions, recreational and leisure activities: 3 options were considered for visitor attractions, recreational and leisure activities Policy 39e):

- Option 1: 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 whenever possible
- Option 2: Proposals for visitors attractions and recreational and leisure development will be permitted within Centres. 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.
- Option 3: Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. Proposals in the countryside will need to demonstrate why a 'Countryside' location is essential.

Countryside proposals should make use of existing buildings whenever possible.

62. Option 1 scored best in terms of the sustainability objectives of the Local Development Plan but in terms of the soundness tests – see commentary below, Option 3 is the preferred option.

	Policy 39e): Visitor Economy - Sustainability Appraisal Summary		
Policy Option	39e)1	39e)2	39e)3
Sustainability Scoring	++	+?	-
Option 1: The policy may help to provide and sustain employment opportunities in the National Park and aims to direct proposals to the largest settlements which are able to absorb larger scale developments. Developments in other locations will need to justify the location.			
Option 2: The policy may help to provide and sustain employment opportunities in the National Park, but to a wider range of locations than option 1, thereby increasing potential for the need to travel and have greater impact on the National Park landscape. Countryside locations have to be justified.			
Option 3: The policy may help to provide and sustain employment opportunities in the National Park, but to a wider range of locations than options 1 and 2, thereby increasing potential for the need to travel and have even greater impact on the National Park landscape. Countryside locations have to be justified.			

Overall Soundness Tests	Policy 39 Visitor Economy
Soundness Test 1 Does the Plan fit?	<p>Planning Policy Wales Edition 9, November 2016 paragraph 11.2.1 Development plans should establish a strategic framework for the provision and enhancement of well designed tourism, sport, recreation and leisure facilities in the areas they cover.</p> <p>They should consider the scale and broad distribution of existing facilities and activities and provide for the accommodation and management of future needs in ways which limit negative environmental impacts (including the consequences of climate change), protecting the landscape, biodiversity, the coast, the historic environment and areas of special interest, and the interests of local communities. They should take into account the environmental, economic and social implications of likely future changes in the provision of these facilities and have regard to objectives for urban regeneration and rural diversification.</p>

Soundness Test 2 Is the Plan appropriate?	<p>The policy is appropriate for the area in light of current national planning policy for rural areas and National Parks in Wales.</p> <p>The policy approach is based on research carried out regarding capacity for further camping, caravanning and chalet development and future requirements for established sites. It takes account of the needs to address a changing market in the area for hotels and guest houses over the years.</p> <p>The policy approach takes account of the need to seek to ensure that tourism development is compatible with the needs of local communities (e.g. prioritising affordable housing delivery) and striking an appropriate balance to ensure the landscape is safeguarded for future generations.</p>
✓	<p>Soundness Test 3 Will the Plan deliver?</p> <p>Policy 39a) is new policy approach. There is demand for these forms of development and the nuanced approach set out in Policy 39a) should deliver some development whilst conserving and enhancing the National Park. This is based on a landscape capacity study which the Authority has undertaken for the preparation of the replacement Plan. The policy will be supported by supplementary planning guidance (i.e. the landscape capacity study) which will provide substantive guidance to assist with the use of the Policy.</p> <p>Policy 39b) provides explicit support for hotels and guest houses. New provision reflects a change in the economy when the National Park has historically experienced decline.</p> <p>Policy 39c) which is supported by supplementary planning guidance has been successfully operated by the Authority in the current and previous Plan. It is intended that the supplementary planning guidance will be taken forward and updated under the replacement Local Development Plan.</p> <p>Policy 39d) This policy has been operated under the current Local Development Plan. Issues have arisen regarding the delivery of affordable housing in conversions in the countryside which this replacement Plan seeks to address.</p> <p>Policy 39e) Provides flexibility for the delivery of visitor attractions in a rural context while seeking to locate proposals in more accessible locations.</p>

Policy 40: Hotels and Guest Houses

Overall sustainability Appraisal of Policy 40 Hotels & Guest Houses

+

Policy performs well against the relevant sustainability appraisal objectives, no changes suggested.

Soundness Test 1 Does the	Planning Policy Wales Edition 9, November 2016, 11.2.2 The development plan should contain clear policies for the provision,
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Plan fit?	protection and enhancement of tourism, sport, recreation and leisure facilities.
✓	
Soundness Test 2 Is the Plan appropriate?	The policy takes account of the needs to address a changing market in the area for hotels and guest houses over the years.
✓	
Soundness Test 3 Will the Plan deliver?	This Policy approach which is supported by supplementary planning guidance has been successfully operated by the Authority in the current and previous Plan. It is intended that the supplementary planning guidance will be taken forward and updated under the replacement Local Development Plan.
✓	

Policy 41: Self-Catering Development

Overall sustainability Appraisal of Policy 41 Self-Catering

+	Maximises opportunities for affordable housing provision whilst allowing for self-catering developments benefitting communities, the environment and economy.
Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9, November 2016 11.2.1: They (Development Plans) should consider the scale and broad distribution of existing facilities and activities and provide for the accommodation and management of future needs in ways which limit negative environmental impacts (including the consequences of climate change), protecting the landscape, biodiversity, the coast, the historic environment and areas of special interest, and the interests of local communities. They should take into account the environmental, economic and social implications of likely future changes in the provision of these facilities and have regard to objectives for urban regeneration and rural diversification.
✓	
Soundness Test 2 Is the Plan appropriate?	The policy is appropriate for the area in light of current national planning policy and the impact of tourism in this National Park. The policy approach takes account of the need to seek to ensure that tourism development is compatible with the needs of local communities (e.g. prioritising affordable housing delivery) and striking an appropriate balance to ensure the landscape is safeguarded for future generations.
✓	
Soundness Test 3 Will the Plan deliver?	This policy has been operated under the current Local Development Plan. Issues have arisen regarding the delivery of affordable housing in conversions in the countryside which this replacement Plan seeks to address.
✓	

Policy 42: Caravan, Camping and Chalet Development

Overall sustainability Appraisal of Policy 42: Caravan, Camping and Chalet Development

+

The policy provides a sensible trade-off between the protection of the landscape and the need to support the local tourism economy. It is likely represents the most sustainable approach towards securing both.

Soundness Test 1 Does the Plan fit?	<p>Planning Policy Wales Edition 9, November 2016 11.2.1</p> <p>Development plans should establish a strategic framework for the provision and enhancement of well designed tourism, sport, recreation and leisure facilities in the areas they cover.</p> <p>They should consider the scale and broad distribution of existing facilities and activities and provide for the accommodation and management of future needs in ways which limit negative environmental impacts (including the consequences of climate change), protecting the landscape, biodiversity, the coast, the historic environment and areas of special interest, and the interests of local communities. They should take into account the environmental, economic and social implications of likely future changes in the provision of these facilities and have regard to objectives for urban regeneration and rural diversification.</p>
Soundness Test 2 Is the Plan appropriate?	<p>The policy is appropriate for the area in light of current national planning policy and the impact of tourism in this National Park.</p> <p>The policy approach is based on research carried out regarding capacity for further camping, caravanning and chalet development and future requirements for established sites.</p>
Soundness Test 3 Will the Plan deliver?	<p>This is a new policy approach. There is demand for these forms of development and the nuanced approach set out in Policy 42 should deliver some development whilst conserving and enhancing the National Park. This is based on a landscape capacity study which the Authority has undertaken for the preparation of the replacement Plan. The policy will be supported by supplementary planning guidance (i.e. the landscape capacity study) which will provide substantive guidance to assist with the use of the Policy.</p>

Policy 43: Site Facilities on Tent, Chalet and Caravan Sites

Overall sustainability Appraisal of Policy 43 Site Facilities on Tent, Chalet and Caravan Sites

+	The policy is unlikely to have a major impact on the Sustainability Objectives other than reducing the need for site users to travel.
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Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9, November 2016 11.2.1: They (Development Plans) should consider the scale and broad distribution of existing facilities and activities and provide for the accommodation and management of future needs in ways which limit negative environmental impacts (including the consequences of climate change), protecting the landscape, biodiversity, the coast, the historic environment and areas of special interest, and the interests of local communities. They should take into account the environmental, economic and social implications of likely future changes in the provision of these facilities and have regard to objectives for urban regeneration and rural diversification.
Soundness Test 2 Is the Plan appropriate?	The policy is appropriate for the area in light of current national planning policy for rural areas and National Parks in Wales. It is recognised that chalet, caravan and tent sites generally require good quality washing and toilet facilities. In addition larger caravan and chalet sites may justify, for example, the provision of a camp shop, office, laundry facility or games room.
Soundness Test 3 Will the Plan deliver?	The policy has been in operation through a series of Development Plans since 1999 when the Authority's first Local Plan was adopted. No issues have arisen with its implementation.

Policy 44: EMPLOYMENT SITES & LIVE/WORK UNITS (Strategy Policy) ★

63. **Employment:** 3 options were considered scale of employment growth(Policy 44a):

- **Option 1:** Direct small-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.
- **Option 2:** Direct small and medium-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.
- **Option 3:** Direct small, medium and large-scale employment proposals to appropriate locations within or adjacent to Centres or buildings suitable for conversion in the countryside.

64. Option 1 scored best in terms of sustainability appraisal.

Policy 44a): Employment Sites & Live Work Units Overall Sustainability Appraisal Summary			
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Policy Option	44a)1	44a)2	44a)3
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Sustainability Scoring	+	-	--
Option 1: This option aims to provide employment in the most accessible places in the national park at a scale that will be easily absorbed into the townscape to minimise the potential for negative landscape impacts.			
Option 2 Whilst this option will provide for employment opportunities in the National Park in, the scale of development has greater potential for impacts to special qualities such as the landscape and community diversity.			
The option would provide employment in accessible locations and could potentially reduce the need to travel for some people. However, the scale would likely generate more trips from outside of centres.			
Option 3: See appraisal for option 2, same effects but to a greater degree due to a further increase in the scale of development.			

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9, November 2016 paragraph 7.5.1: <ul style="list-style-type: none"> - Include criteria-based policies to deal with development not specifically allocated in the development plan and help respond to unexpected change; - in safeguarding existing sites and providing new sites, prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities - seek to provide the right amount of land and qualitative mix of sites to meet the market demand for economic development uses. A small amount of land was suggested for employment purposes during the Candidate Site process but deliverability issues would suggest that a flexible criteria based policy approach would be the most appropriate approach to take.
Soundness Test 2 Is the Plan appropriate?	The policy takes account of the likely opportunities in a National Park context and the need to protect existing employment sites.
Soundness Test 3 Will the Plan deliver?	Policy 44a) to c) has been reviewed to ensure that issues set out in the Review Report are addressed regarding land availability and the viability of bringing forward employment land.

Policy 45 Protection of Employment Sites and Buildings

Overall sustainability Appraisal of Policy 45 Protection of Employment Sites and Buildings
+ Allows development land to be used more flexibly to meet the needs of communities. Likely to result in development on

	brown- rather than green-field sites
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Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9, November 2016 paragraph 7.5.1: <ul style="list-style-type: none">- in safeguarding existing sites and providing new sites, prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities
Soundness Test 2 Is the Plan appropriate?	The policy takes account and the need to protect existing employment sites and the scarcity of opportunities for development that seeks to sustain local communities.
Soundness Test 3 Will the Plan deliver?	The policy has been in operation since Local Development Plan adoption. Clarification of the expectations for affordable housing provision was needed and has been provided.

Policy 46: Agricultural Diversification *

Overall sustainability Appraisal of Policy 46 Agricultural Diversification	
+	Overall this policy is largely compatible with the Sustainability Appraisal objectives.

Soundness Test 1 Does the Plan fit?	Policy has regard to national planning policy: <ul style="list-style-type: none">- Planning Policy Wales Edition 9, November 2016, paragraph 7.3.3, paragraph 7.5.1- Technical Advice Note 6, July 2010, paragraph 3.3.3, section 3.7
Soundness Test 2 Is the Plan appropriate?	The policy is appropriate for the area in light of current national planning policy for rural areas and National Parks in Wales.
Soundness Test 3 Will the Plan deliver?	A limited number of farm diversification proposals have come forward in this National Park over the years. The Authority has operated within the confines of national planning policy under the current Local Development Plan which is reflected above. No issues have arisen regarding the use of national planning policy to consider proposals but Planning Policy Wales now asks Authorities to include policies within their Plans.

Priority E: Affordable Housing and Housing

Policy 47 & 49 HOUSING (Strategy Policy) & AFFORDABLE HOUSING

65. Housing: 5 options were considered:

Option 1: A policy based on the latest Welsh Government National Park Household Projections.

Option 2: A policy based on providing for market housing to cross subsidise the provision of affordable housing. Affordable housing need exceeds that which the market housing can provide for. The key determinants for what can be provided are the:

- distribution of housing development in accordance of with the Plan's spatial strategy
- the deliverability of sites
- the National Park's landscape capacity to absorb additional housing development

Option 3: 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.

Option 4: 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.

Option 5 (arising from the Preferred Strategy consultation): Require housing to be used as a principal residence.

66. Option 3 had the potential to score best in terms of sustainability appraisal as it had the potential to provide for more affordable housing.

Policy 47 & 49 Overall Sustainability Appraisal Summary					
Policy Option	1	2	3	4	5
Sustainability Scoring	-	++	++	+	-
Option 1: A strategy that provides only affordable housing would seem to be compatible with the SA objectives related to social inclusion and community cohesion. However, the likelihood of progressing those objectives is significantly reduced over the other options as this strategy would rely on exception sites.					
The option also relies entirely on National Policy, which allows for development in Alternative Options & Appraisal Background Paper March 2018					

inaccessible locations. Although the chances for this to happen are low, for the reasons stated above, the other options considered are inclusive of accessibility and on the whole are more likely to progress the SA Objectives.

Option 2: As per option 3 but is likely to provide for less affordable housing due greater emphasis on deliverability.

Option 3: Some negative impacts of housing development are inevitable these include waste, carbon emissions and minerals use. Other policies within the Local Development Plan will help to mitigate these as much as possible. This policy option directs housing development to where it is needed and prioritises affordable housing over market housing. This will enable people live locally, reducing their need to travel and help to maintain communities and their cultural distinctiveness in the National Park.

Option 4: As option 3 but to a lesser degree as this policy allows for less affordable housing.

Option 5: The incidence of second and holiday home ownership in the National Park is a significant issue and does impact on the viability of communities. However, placing a principal residence occupancy condition on new dwellings would mean that no affordable housing could be secured from new developments.

Soundness Test 1 Does the Plan fit?	<p>Option 1 would only consider one element of the matters local planning authorities would need to take account of when determining a housing land supply.</p> <p>The second option is the most compliant with national planning policy in its drafting and in the derivation of the housing land supply.</p> <p>Option 3 which refers to the current Plan's policy has had deliverability issues which Option 2 seek to address and therefore wouldn't comply with national policy.</p> <p>Option 4 would not be compliant with national policy.</p> <p>With regard to Option 5 experience has shown that a similar policy approach (with occupancy controls) suggested in an earlier Plan requires a weight of evidence that is substantial. Housing figures for this National Park would in any case suggest a need to focus on the delivery of affordable housing – see comment below.</p>
Soundness Test 2 Is the Plan appropriate?	<p>Option 2 and 3 takes account of the need for housing/affordable housing in the area. Option 1 and 4 do not result from an assessment of these matters. Option 2 policy requirements are based on the most up to date advice available on affordable housing need, viability assessments and deliverability evidence.</p> <p>It is difficult to see how Option 5 would result the appropriate solution for the area because if all new housing was controlled in terms of occupancy this would prevent the Authority from negotiating affordable housing which is seen as a key priority of the Plan – paragraph 9.2.14 and 9.2 16 of PPW refers.</p> <p>All options would need to be underpinned by the National Park's statutory purposes.</p>

✓	
Soundness Test 3 Will the Plan deliver?	<p>Flexibility has been written into the Development Plan's housing provision, particularly for those sites which may not come forward for development within the plan period. An additional housing provision has been considered for incorporation as contingency to allow a degree of flexibility within the Plan. This is included in Option 2.</p> <p>Sites provided for in the Plan have been subject to a Land Allocation Implementation Study to ensure deliverability is given greater attention.</p> <p>Flexibility is also offered through the use of the phrase 'seek to negotiate', the use of the Development Appraisal toolkit in testing viability and an annual assessment of viability which allows the Authority to adjust affordable housing requirements if needed.</p> <p>Option 1 is likely to result in deliverability issues in terms of affordable housing.</p> <p>Option 3 which is the current Plan policy has deliverability issues.</p> <p>Option 4 is likely to be deliverable in the more buoyant areas of the Park but there may be difficulties in lower value areas.</p>
✓	There are concerns regarding the deliverability of Option 5 in terms of practical difficulties with enforcement.

Policy 47 & 49: Housing and Affordable Housing Overall Soundness Summary						
Policy Option	1	2	3	4	5	
Soundness Test 1	✓	x	✓	✓	x	x
Soundness Test 2	x		✓	x	✓	x
Soundness Test 3	x	✓		x	x	✓

67. Conclusion: Option 2 scored best overall in terms of sustainability appraisal and the soundness tests.

Policy 48 HOUSING Allocations *

68. The allocations sites have been subject to detailed appraisal as described in the reasoned justification of the policy. No further commentary is provided here.

Policy 50: Housing Densities and Mix

Overall sustainability Appraisal of Policy 50 Housing Densities and Mix	
+	The policy will help to ensure efficient use of land and greater viability of sites to deliver affordable housing for associated benefits. The policy will also help to protect landscapes and townscapes by ensuring that development density is in keeping with character and providing a range and choice of housing.
Soundness Test 1 Does the Plan fit?	Paragraph 4.7.2, 4.74 of Planning Policy Wales refers to identifying locations for higher density development at hubs. Policies will be needed to cover the physical scale and design of new buildings, access, density (paragraph 9.2.12, 9.2.24.). The text relating to mix of housing reflects national planning policy (9.2.15)
Soundness Test 2 Is the Plan appropriate?	The policy approach regarding density has worked reasonably well in the first Local Development Plan. Issues have arisen with the interpretation of the policy approach and this has been clarified alongside the site allocation policy. With regard to mix of development this has been a regular issue for the Authority in terms of the mix of affordable and market housing. The Authority has relied on national planning policy to support its position but greater emphasis and the importance of this policy approach and how it will be applied was needed.
Soundness Test 3 Will the Plan deliver?	Both policy approaches set out in the policy have been in operation for some time. The amendments made should improve interpretation and therefore deliverability of outcomes.

Policy 51: Gypsy Sites

Overall sustainability Appraisal of Policy 51 Gypsy Sites	
+	The policy aims to integrate Gypsy and Traveller sites into existing communities in the National Park, ensure that residents have access to the services and facilities they need and minimise the impacts to landscape and character.

Soundness Test 1 Does the Plan fit?	<p>Policy has regard to national planning policy. Planning Policy Wales Edition 9, paragraph 9.2.21</p> <ul style="list-style-type: none"> - It is therefore important that local planning authorities have policies for the provision of Gypsy sites in their development plans. In drawing up policies local planning authorities should consult providers of social housing, representatives of Gypsies and Travellers and landowners in areas likely to be appropriate for Gypsy sites, in accordance with their Community Involvement Scheme. <p>The Authority invited candidate Gypsy & Traveller sites. None have come forward.</p> <p>The policy in the replacement Plan has been taken forward from the adopted Local Development Plan which was compliant with Welsh Assembly Government Circular 30/2007. The policy has been used in two appeal decisions where no issue was raised by the Inspector.</p> <p>Welsh Government has raised issues regarding criterion a) of the policy through the preferred strategy consultation. The Authority is awaiting advice following the publication of a new Circular (awaited). This is the same issue that Welsh Government raised on the 1st Local Development Plan.</p>
Soundness Test 2 Is the Plan appropriate?	See above for Test 1.
Soundness Test 3 Will the Plan deliver?	The Policy is a criteria based policy which seeks to ensure that appropriate opportunities gain planning permission.

Policy 52: One Planet Development

Overall sustainability Appraisal of Policy 52 One Planet Developments	
+	Appropriate One Planet will be inherently more sustainable and yield biodiversity and landscape benefits.

Soundness Test 1 Does the Plan fit?	Policy has regard to national planning policy. Planning Policy Wales Edition 9, paragraphs 9.3.11 and 9.3.12.
Soundness Test 2 Is the Plan appropriate?	The policy is appropriate for the area as it adds some specific additional local considerations for these types of development which will apply in addition to national

✓	planning policy.
Soundness Test 3 Will the Plan deliver?	The policy is a criteria based policy which has been used by Inspector's at appeal without issues being raised.
✓	

Priority F: Community Facilities Retailing, Transport

**Policy 53: COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS
(Strategy Policy) ★**

69. Two policy options were considered for Policy 53:

- Option 1 considered the provision of facilities, protecting facilities, and ensuring new development made suitable arrangements for the improvement or provision of infrastructure, services and community facilities made necessary by the development.
- Option 2 added an additional caveat to the first option to ensure that planning obligations are sought addressed the most acute areas of need.

70. Both options are sustainable. The second option allows for prioritisation for areas of acute need where issues arise in terms of the viability of projects. The second option is the preferred option.

Overall sustainability Appraisal of Policy 53 Community Facilities & Infrastructure Requirements

++	Overall the policy performs well against the SA Objectives particularly 8, 9, 10 and 13, which cover the social and cultural needs of communities in the National Park, as it aims to provide for these needs. Additionally, by aiming to provide facilities in accessible locations, there may also be benefits for the environment and climate change through reduced car use.
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Soundness Test 1 Does the Plan fit?	Paragraph 9.2.24 of Planning Policy Wales Edition 9 November 2016 asks that Local Development Plans include policies to indicate where developer contributions will be expected toward infrastructure, community facilities and affordable housing. The LDP should provide a framework for tourism, sport, recreation and leisure facilities (11.1.8) setting out a strategic approach to such development in the area (11.2.1).
Soundness Test 2 Is the Plan appropriate?	The policy aims to address key issues for the National Park: <ul style="list-style-type: none"> - Providing community facilities - Protecting community facilities - Ensuring the provision of community facilities made necessary by a development. - Ensuring that where redundant uses that help sustain local communities are provided for.

Soundness Test 3 Will the Plan deliver?	The policy has been in operation since the Local Development Plan has been adopted in 2010. It is proposed that additional supplementary planning guidance is needed to support Policy 53b) – see Community Facilities Background Paper. Annual Monitoring Reports since the Local Development Plan was adopted have not shown any other issues that need to be addressed as a result of the policy's implementation.
✓	

Policy 54: RETAIL IN THE NATIONAL PARK (Strategy Policy) ★

71. **Primary Frontage:** Two options were considered regarding the inclusion of a primary frontage in Tenby:

- Option 1: Retain a primary retail frontage within Tenby town centre.
- Option 2: Remove primary retail frontages from Tenby town centre.
- Option 3: Introduce primary retail frontages within identified centres of the National Park.

72. Option 1 was the preferred option in sustainability appraisal terms.

Policy 54: Retail in the National Park – Primary Frontages			
Policy Option	1	2	3
Sustainability Scoring	+	-	+?
Option 1: This option is more likely to retain a range of shopping opportunities within the centre, attracting visitors and residents, reducing the need to travel elsewhere for shopping needs.			
Option 2: Whilst non retail uses can bring investment and refurbishment to centres, this does not outweigh the impact of reduced shopping opportunities within the centres if they are currently displaying a healthy, vibrant and diverse core offer and appear to be functioning well with low vacancy rates.			
Option 3: This option would help to maintain a range of shopping facilities at shopping centres, reducing the need to journey to competing centres. It may also however create an unnecessary level of control that, in times of economic hardship, may lead to long term vacancy rates increasing within smaller Centres, reducing their appeal for residents and visitors. There does not appear to be a trend of increasing non retail uses to the detriment of the retail character, vitality or viability of centres.			

73. **Centre Boundaries:** Two options were considered for the defining of centre boundaries:

- Option 1: To draw extensive centre boundaries
- Option 2: To draw restricted town and district centre boundaries

74. The second option was the preferred option in sustainability terms.

Policy 54: Retail in the National Park – Centre Boundaries		
Policy Option	1	2
Sustainability Scoring	-	+
Option 1: Extensive boundaries have little relationship with many of the sustainability objectives. It would have the potential to undermine the commercial core of centres, may dilute the character of centres and create additional travel.		
Option 2: 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.		

Overall sustainability Appraisal of Policy 54 Retail in the National Park	
+	<p>Planning Policy Wales Edition 9 November 2016 paragraph 10.2.3 and 10.2.4 requires that development plans establish the existing hierarchy of centres. Once this hierarchy is established, it will enable a set of policies which enable development to take place in appropriate centres and at appropriate scales. This is fully in support of Welsh Government objectives for retailing and town centres. It will encourage vibrant and viable centres.</p> <p>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.</p> <p>Retail provision in the smaller centres would make a significant contribution to sustaining, and maintaining distinctive, local communities, and reducing the need to travel for everyday shopping needs.</p>

Soundness Test 1 Does the Plan fit?	The approach is in accordance with Planning Policy Wales Edition 9 November 2016 Chapter 10. It is consistent with neighbouring authorities' Local Development Plans.
Soundness Test 2 Is the Plan appropriate?	The policy approach is founded on the retail hierarchy of the National Park taking into account the approach used in neighbouring authorities' Plans. The Retail Background Paper provides the rationale. Also please refer to the latest Regional Retail Study 2016.
Soundness Test 3 Will the Plan deliver?	A similar policy has been included in previous Plans (since 2006) and has operated without issues arising.

Policy 55: Town, District and Local Shopping Centres

Overall sustainability Appraisal of Policy 55 Town, District and Local Shopping Centres	
+	The policy represents a sustainable way of delivering shopping opportunities in the National Park, that should help maintain the centres in terms of viability and character.

Soundness Test 1 Does the Plan fit?	The approach is in accordance with Planning Policy Wales Edition 9 November 2016 Chapter 10. It is consistent with neighbouring authorities' Local Development Plans.
Soundness Test 2 Is the Plan appropriate?	The policy approach is founded on the retail hierarchy of the National Park taking into account the approach used in neighbouring authorities' Plans. The Retail Background Paper provides the rationale. Also please refer to the latest Regional Retail Study 2016.
Soundness Test 3 Will the Plan deliver?	A similar policy has been included in previous Plans (since 2006) and has operated without issues arising.

Policy 56: Garden Centres

+/-	Examining this policy against the sustainability framework suggests there may be minor negative impacts upon sustainability, however there are equally positive impacts in terms of the potential boost to local rural economies. Many of the objectives are not relevant.
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Soundness Test 1 Does the Plan fit?	Garden Centres are not dealt with specifically in national planning policy. No specific mention in PPW, TAN or draft retail policy, or TAN 6. The policy seeks to direct such proposals to accessible locations which is consistent with national planning policy.
✓	

Soundness Test 2 Is the Plan appropriate?	<p>Market gardens and nurseries are to some extent a feature of rural, agricultural areas which have helped to shape the landscape and diversify the income potential of rural areas. Although locations can vary, usually in connection with historical factors, they are more likely to be found close to or within existing settlements.</p> <p>Open air garden centres are classed as sui generis although all will have a retail element, shops are classed as A1. It is unlikely that there will be garden centres able to open within towns, and will more likely be on the fringes of centres.</p> <p>This is consistent with new employment policy – but can distinguish as garden centres wouldn't always employ many.</p>
Soundness Test 3 Will the Plan deliver?	<p>This policy has been in operation since 2006 in the National Park. No issues have arisen from its implementation. Proposals coming forward have been limited.</p>

Policy 57: SUSTAINABLE TRANSPORT (Strategy Policy)

Overall sustainability Appraisal of Policy 57 Sustainable Transport	
+	The policy scores well in sustainability terms as it aims to reduce congestion and improve access to sustainable transport.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 includes reference to policies for traffic management (paragraph 8.6.2)
Soundness Test 2 Is the Plan appropriate?	The policy includes specific considerations for this National Park – see Test 1 above.
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation over that time period (from 2010).

Policy 58: Impacts of traffic

Overall sustainability Appraisal of Policy 58 Traffic Impacts	
+	This policy aims to mitigate the environmental and social impacts of traffic for minor positive effects against the SA

	framework.
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Soundness Test 1 Does the Plan fit?	This option follows the National guidance set out in Technical Advice Note 18, but sets the criteria for assessment to levels more relevant to the National Park.
✓	
Soundness Test 2 Is the Plan appropriate?	The policy includes specific considerations for this National Park – see Test 1 above.
✓	
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation over that time period (from 2010). The reasoned justification needed clarification following feedback from Development Management.

Policy 59: Cycleways

Overall sustainability Appraisal of Policy 59 Cycleways

++	The policy is likely to prove sustainable as it aims to extend opportunities for cycling as an alternative to the private car, and support National Park communities
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Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 paragraph 8.2.3 refers to encouraging development of the national cycle network and new and improved routes for cycling.
✓	
Soundness Test 2 Is the Plan appropriate?	The policy includes specific considerations for improving accessibility within the County generally and where specific issues arise within the National Park.
✓	
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan and the previous Joint Unitary Development Plan. No issues have arisen with the policy's implementation over that time period (from 2006).

Policy 60: Powerlines and Pipelines

Overall sustainability Appraisal of Policy 60 Powerlines and Pipelines

+	Will help protect and enhance the landscape.
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Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 doesn't require a specific policy on the above but given the geography of this National Park and the proximity of the Milford Haven Waterway industrial area, and the potential for offshore renewable energy provision , a context is needed for considering such proposals or when preparing Local Impact Reports for larger schemes.
Soundness Test 2 Is the Plan appropriate?	The policy includes specific requirements for dealing with powerlines and pipelines in a National Park. See Test 1 commentary also.
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan. No issues have arisen with the policy's implementation over that time period (from 2010).

Policy 61: Telecommunications

Overall sustainability Appraisal of Policy 61 Telecommunications	
+	Protects the landscape from the negative impacts of telecommunications development.

Soundness Test 1 Does the Plan fit?	Planning Policy Wales Edition 9 November 2016 paragraph 12.12.1(refers to including policies to cover this issue).
Soundness Test 2 Is the Plan appropriate?	The policy includes specific requirements for dealing with telecommunications masts in a National Park.
Soundness Test 3 Will the Plan deliver?	This policy has been included in the first Local Development Plan and its predecessor the Joint Unitary Development Plan. No issues have arisen with the policy's implementation over that time period (from 2006).

Appendix 1 Alternative Spatial Options

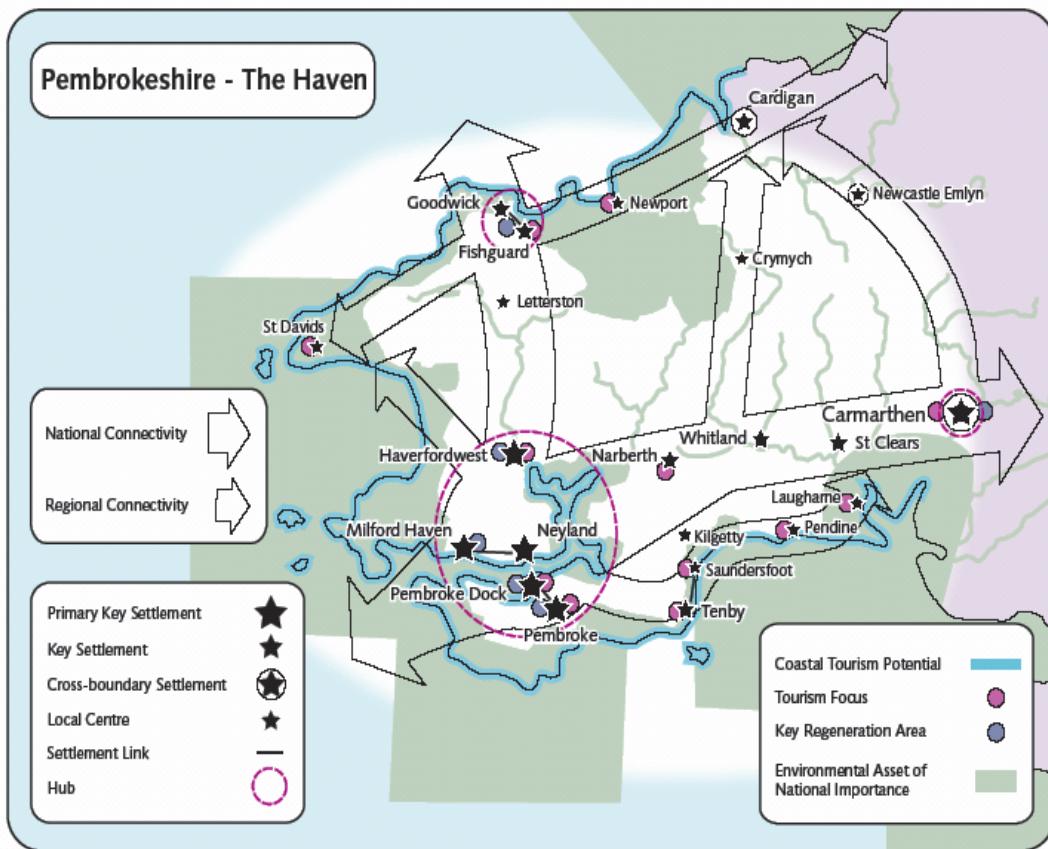
75. Within the National Park the ability to consider numerous spatial options is constrained by its relationship as a predominantly thin strip on the edge of west Wales and the role of its settlements relative to larger centres further east.
76. For the 1st Local Development Plan the Authority reviewed the options available from the Wales Spatial Plan update⁵ for the Pembrokeshire Haven along with some additions.
77. There were **3 options** considered from the Wales Spatial Plan :

- **WSP Spatial Option 1: Dispersed Strategy** Growth dispersed across the area, with every settlement receiving a proportional share of future development and investment. Overall level of growth would be greater than that identified in (what was then) the current Unitary Development Plans.
- **WSP Spatial Option 2: Two Centre Strategy:** Concentrates future housing, employment and other developments within the key urban centres of Haverfordwest and Carmarthen.
- WSP Spatial Option 3: Focused Key Settlement/Hybrid Approach
Strategy ★_{WSP}
- Continuation of the existing Unitary Development Plans (at the time), with additions to more fully accord with Wales Spatial Plan vision.
This was the preferred approach taken in the Wales Spatial Plan.
It defines the role for the following Centres in the National Park:

 - Tenby Tier 2
 - Saundersfoot Tier 3
 - Newport Tier 3
 - St Davids Tier 3

⁵ The soundness tests asks that the Plan has regard to national policy and the Wales Spatial Plan – page 100 local Development Plan Manual – Edition 2- August 2015.

Map of Option 3 WSP Spatial Option 3: Focused Key Settlement/Hybrid Approach Strategy



What Spatial Strategy was chosen for the Wales Spatial Plan ? (and why)

78. Option 3 was taken forward and developed in the Local Development Plan for the National Park.
79. The Wales Spatial Plan appraisal of Options 1 to 3⁶ identified Option 3 as offering the clearest benefits for sustainability within the employment, housing, environment and physical regeneration topics.
80. Option 3 did not perform as well as Option 2 with regard to the transport and infrastructure topic; this is owing to the inclusion in Option 3 of improvements to the airport, which are expected to bring disbenefits to air

⁶ F:\Park Direction\Subjects\Wales Spatial Plan\Sustainability Appraisal\Final Report Vol1.pdf

and noise quality and greenhouse gas emissions which may outweigh any benefits gained from improved public transport.

81. The sustainability appraisal of the Wales Spatial Plan identified a number of mitigation measures to ensure that any negative impacts of Option 3, the Focused Key Settlement/Hybrid Approach, are minimised or avoided, and the potential benefits are maximised in the Pembrokeshire Havens Wales Spatial Plan area. These are set out in the Local Development Plan's Sustainability Appraisal (See section 4 Sustainability context, baseline & objectives) and the proposed changes made to the original Local Development Plan strategy that addressed these concerns.

Key to the Wales Spatial Plan Sustainability Appraisal

++	Option in its current form has major positive effects as it would maximise opportunities to resolve existing issue(s).
+	Option in its current form has positive effects as it would help resolve existing issue(s).
?	Effect of option is uncertain.
0	Option would have neutral or no effects.
-	Option in its current form has negative effects as it would do little to help resolve, or may contribute to some worsening of, existing issue(s).
--	Option in its current form has major negative effects as it would substantially exacerbate existing issue(s). Consider exclusion of option.

WSP Spatial Option 1: Dispersed Strategy Growth

	Employment	Housing	Environment	Transport/ Infrastructure	Physical Regeneration	Total
++	1	0	0	0	0	1
+	6	1	8	4	0	19
?	1	2	2	1	0	0
0	0	1	4	1	0	6
-	7	11	1	9	0	28
--	0	0	0	0	0	0

WSP Spatial Option 2: Two Centre Strategy

Alternative Options & Appraisal Background Paper March 2018

WSP Spatial Option 2: Two Centre Strategy

	Employment	Housing	Environment	Transport/ Infrastructure	Physical Regeneration	Total
++	1	0	0	0	0	1
+	0	5	8	14	10	37
?	0	2	1	0	1	0
0	1	1	4	0	3	9
-	7	7	2	1	1	18
--	6	0	0	0	0	6

WSP Spatial Option 3: Focused Key Settlement

	Employment	Housing	Environment	Transport/ Infrastructure	Physical Regeneration	Total
++	7	1	5	0	8	21
+	7	10	7	7	3	34
?	0	3	1	0	1	0
0	0	0	2	0	3	5
-	1	1	0	8	0	10
--	0	0	0	0	0	0