


PLANNING POLICY WALES EDITION 10
PUBLISHED 5TH DECEMBER 2018 AND
PEMBROKESHIRE COAST NATIONAL PARK
LOCAL DEVELOPMENT PLAN 2

TABLE OF CONTENTS

Summary.....	3
Notes on using Planning Policy Wales Edition 10	5
Placemaking outcomes and the Objectives of Local Development Plan 2	6
Table 1 Placemaking outcomes and the Objectives of the Local Development Plan	6
Strategic and Spatial Choices and placemaking chapters and Local Development Plan 2.	9
Table 2 Local Development Plan 2 and Planning Policy Wales 10	10
Sustainability Appraisal Objectives and PPW 10 placemaking outcomes	29
Table 3 Sustainability Objectives and Placemaking Outcomes.....	29

SUMMARY

1. The purpose of this paper is to consider the implications of Planning Policy Wales 10 published December 2018 for the Pembrokeshire Coast National Park Local Development Plan 2. Local Development Plan 2 was drafted alongside Planning Policy Wales 9 which has now been superseded.
2. In summary the overall approach has been to:
 - a. Consider any implications for the Sustainability Appraisal objectives when considered against the Place Making outcomes of Planning Policy Wales Edition 10 (Figure 4).
 - b. To consider any issues of substance arising for the Equalities Impact Assessment as a result of analysing the detail Planning Policy Wales Edition 10 against the text of Local Development Plan 2 (Figure 5 and the chapters of Planning Policy Wales).
 - c. To consider if the text of the Local Development Plan is fit for purpose when considered against Planning Policy Wales 10. This was done through reviewing the Objectives of the Plan against the Placemaking outcomes and by examining the detailed policies of the Plan against the various relevant chapters of Planning Policy Wales.
3. This review has resulted in no issues of a substantive nature arising for the Local Development Plan.
4. Detailed analysis shows that:
 - a. The objectives of both the Local Development Plan and the Sustainability Appraisal are compatible with the Place making outcomes – see Tables 1 and 3 of this paper respectively.
 - b. Numerous paragraph cross references to Planning Policy Wales in Local Development Plan 2 require updating without altering the substance of the Plan – see Table 2 of this Paper.
 - c. There are two instances where a more substantive edit is required to the Local Development Plan the implications of which summarised below – see Table 2 for more detail. The relevant rows are highlighted with a ‘’:
 - Edits to the reasoned justification for the renewable energy deleting references to Planning Policy Wales 9 which are no longer included in Planning Policy 10. The edits do not change the application of Policy 34 Renewable Energy. There is however an outstanding issue with Welsh Government regarding the use of such referencing.

- Edits to the biodiversity section to clarify advice regarding sites and species of local importance.
5. Alongside this paper a tracked changes version of the submitted Local Development Plan shows the effect of these edits.

6. **Paragraph 1.9** - PPW should be read as a whole, as aspects of policy and their application to a particular development proposal could occur in several parts of the document. Where **'must'** is used in the document it reflects a legislative requirement or indicates where action is needed now to make changes in practice over the long term to achieve strategic outcomes. Where **'should'** is used it reflects Welsh Government expectations of an efficient and effective planning system.

7. **Figure 6:** Figure 6 asks that development plans and proposals be assessed against the national sustainable placemaking outcomes (in Figure 4) and the strategic and spatial choices (Figure 5) and then the placemaking themes (also Figure 5) and the detailed chapters of Planning Policy Wales Edition 10.

PLACEMAKING OUTCOMES AND THE OBJECTIVES OF LOCAL DEVELOPMENT PLAN 2

8. Table1 below picks up on the relationship between the outcomes in Planning Policy Wales 10 and the objectives of the Plan shown in brackets. The objectives themselves as set out in the Plan include specific Local Development Plan policy references. Focus is on where immediate positive relationships can be identified. No obvious areas of conflict were identified. All denote a direction of travel which is consistent in approach.
9. The Authority also attempted a comparison of the Placemaking outcomes with the Vision of the Plan but the analysis was too ephemeral to be meaningful.

TABLE 1 PLACEMAKING OUTCOMES AND THE OBJECTIVES OF THE LOCAL DEVELOPMENT PLAN

<p>1. Creating and Sustaining Communities</p> <ul style="list-style-type: none"> • Enables the Welsh language to thrive (Welsh Language & Culture) • Appropriate development densities (Landscape & Seascape) (Sustainable Design) (Affordable Housing and Housing) • Homes and jobs to meet society’s needs (Scale and Location of Growth) (Employment) (Affordable Housing and Housing) (Retail) • A mix of uses (Scale and Location of Growth) (Employment), (Enjoyment), (Affordable Housing and Housing) (Community Facilities) (Retail) • Offers cultural experiences (Historic Environment) (Landscape and Seascape) (Enjoyment) (Community Facilities) (Welsh Language & Culture) • Community based facilities and services (Community Facilities)(Retail)(Transport) (Utilities)
<p>2. Growing Our Economy in a Sustainable Manner</p> <ul style="list-style-type: none"> • Fosters economic activity (Historic Environment) (Scale and Location of Growth) (Employment, Enjoyment) (Affordable Housing & Housing), (Retail), (Transport), (Utilities) • Enables easy communication (Utilities) • Generates its own renewable energy (Sustainable Design) (Renewable Energy) • Vibrant and dynamic (Community Facilities, Retail) (Scale & Location of Growth) (Employment), (Enjoyment), (Affordable Housing &Housing), (Transport) • Adaptive to change (Scale and Location of Growth) (Biodiversity & Geodiversity), (Landscape &Seascape), (Sustainable Design), (Coastal Management) (Flooding) (Employment) • Embraces smart and innovative technology (Renewable Energy) (Sustainable Design) (Employment) (Utilities)
<p>3. Making Best Use of Resources</p> <ul style="list-style-type: none"> • Makes best use of natural resources (Biodiversity & Geodiversity), (Landscape & Seascape), (Minerals), (Pollution), (Unstable land and contamination), (Renewable Energy), (Soil Air and Water Quality), (Sustainable Design) • Prevents waste (Waste), (Pollution Unstable Land & Contamination), (Renewable Energy), (Sustainable Design), • Prioritises the use of previously developed land and existing buildings (Historic

- Environment), (Scale & Location of Growth)
- Unlocks potential and regenerates (Historic Environment) (Pollution, Unstable Land and Contamination) (Renewable Energy) (Employment) (Enjoyment) (Affordable Housing & Housing) (Community Facilities) (Retail) (Scale & Location of Growth)
- High quality and built to last (Sustainable Design), (Coastal Management), (Flooding) (Affordable Housing & Housing)

4. Maximising Environmental Protection and Limiting Environmental Impact

- Resilient biodiversity and ecosystems (Biodiversity and Geodiversity), (Landscape & Seascape) (Renewable Energy), (Soil, Air & Water Quality), (Sustainable Design), (Enjoyment)
- Distinctive and special landscapes (Historic Environment), (Biodiversity & Geodiversity), (Scale & Location of Growth), (Landscape and Seascape) (Minerals) (Waste), (Ministry of Defence), (Renewable Energy), (Soil Air and water Quality), (Sustainable Design), (coastal management), (flooding), (employment), (enjoyment), (utilities).
- Integrated green infrastructure (Biodiversity and Geodiversity), (Landscape & Seascape), (Scale & Location of Growth), (Sustainable Design), (Community Facilities)
- Appropriate soundscapes (Historic Environment), (Landscape and Seascape), (Scale & Location of Growth), (Minerals), (Ministry of Defence). (Sustainable Design)
- Reduces environmental risks (Biodiversity & Geodiversity) (Landscape & Seascape) (Minerals), (Waste) (Pollution & Unstable Land and Contamination), (Sustainable Design) (Soil, Air, Water Quality) (Coastal Management) (Flooding),
- Manages water resources naturally (Biodiversity & Geodiversity), (Sustainable Design) (Soil, Air, Water Quality) (Landscape & Seascape), (Pollution, Unstable Land, Contamination) (Flooding) (Utilities)
- Clean air (Biodiversity & Geodiversity), Landscape & Seascape) (Renewable Energy) (Soil, Air & Water Quality), (Sustainable Design),
- Reduces overall pollution (Biodiversity & Geodiversity) (Sustainable Design)(Soil, Air, Water Quality) (Pollution, Unstable Land Contamination) (Renewable Energy), (Transport)
- Resilient to climate change (Biodiversity & Geodiversity), (Renewable Energy), (Soil air and Water Quality) (Sustainable Design),(Coastal Management) (Flooding)
- Distinctive and special historic environments (Historic Environment), (Minerals), (Sustainable Design), (Retail), (Landscape & Seascape).

5. Facilitating Accessible and Healthy Environments

- Accessible and high quality green space (Historic Environment), (Biodiversity and Geodiversity) (Landscape and Seascape) (Community Facilities)
- Accessible by means of active travel and public transport (Scale and Location of Growth) (Sustainable Design) (Community Facilities) (Retail), (Transport)
- Not car dependent (Scale and Location of Growth), (Sustainable Design), (Employment), (Housing), (Community Facilities), (Retail),
- Minimises the need to travel (Scale and Location of Growth), (Waste), (Sustainable Design), (Employment), (Housing), (Community Facilities), (Retail)
- Provides equality of access (Landscape & Seascape), (Scale & Location of Growth), (Sustainable Design) (Employment, Enjoyment) (Affordable Housing and Housing) (Utilities)(Transport)(Community Facilities) (Retail)
- Feels safe and inclusive (Landscape & Seascape), (Scale & Location of Growth), (Sustainable Design) (Coastal Management), (Flooding), (Employment), (Enjoyment) (Affordable Housing and Housing) (Utilities)(Transport)(Community Facilities) (Retail)
- Supports a diverse population (Scale & Location of Growth), (Sustainable Design), (Employment), (Enjoyment), (Affordable Housing & Housing), (Community Facilities), (Retail), (Transport).
- Good connections (Scale and Location of Growth) (Sustainable Design), (Employment), (Affordable Housing &Housing) (Utilities)(Transport)(Community Facilities)
- Convenient access to goods and services (Scale and Location of Growth) (Waste), (Employment), (Affordable Housing & Housing), (Retail) (Utilities)(Transport)(Community Facilities)

- Promotes physical and mental health and well-being (Historic Environment), (Biodiversity & Geodiversity), (Landscape & Seascape), (Pollution, Unstable land, Contamination) (Sustainable Design), (coastal management), (flooding), (enjoyment), (employment), (Scale and Location of Growth) (Utilities)(Transport)(Community Facilities)

10. The degree to which the detail of Planning Policy Wales 10 under the Strategic and Spatial Choices and placemaking chapters are reflected in the various policies of the Local Development Plan are analysed in Table 2 overleaf.
11. The table below identifies each policy reference in Local Development Plan 2, the equivalent Planning Policy Wales reference along with any additional considerations that are required (beyond application of the Plan) as a result of the publication of Planning Policy Wales 10. Topic areas under the various strategic choices and placemaking themes are highlighted in pink in column 3. Potential Matters Arising Changes are highlighted as MAC and shown in the accompanying track changes version of Local Development Plan 2.

TABLE 2 LOCAL DEVELOPMENT PLAN 2 AND PLANNING POLICY WALES 10


LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
Introduction	1.6 refers to PPW9	Refer to PPW10	Update reference MAC.
	1.18 refers to PPW9	No reference to tests of soundness in PPW10.	Delete reference to PPW9 MAC
Objectives Minerals	Footnote 22 paragraph 14.3.2	5.14.35	Update reference MAC.
Objectives: major development	Footnote 23:references paragraphs 5.5.5 and 5.5.6 of PPW 9	No equivalent for 5.5.5. See 6.3.10 of PPW 10 for major development test – same test as PPW 9.	Update reference MAC.
Key Outcomes	Footnote 24 paragraph 5.5.6 and 14.3.2	See 6.3.10 of PPW 10 for major development test – same test as PPW 9. Also 5.14.35	Update references MAC.
Objectives Pollution etc.	Footnote 26 Chapter 12 and 13	See Chapter 6	Update reference MAC.
Objectives Soil etc.	Footnote 27 Chapter 12 and 13	See Chapter 6	Update reference MAC.
Policy 1		Spatial Strategy and Site Search Sequence para 3.37, page 34 Accessibility 3.45, page 36 Previously developed land para 3..51, page 37	Fit for purpose
Policy 2		Spatial Strategy and Site Search Sequence para 3.37, page 34 Accessibility 3.45, page 36 Previously developed land para 3..51, page 37	Fit for purpose

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
Policy 3		Spatial Strategy and Site Search Sequence para 3.37, page 34 Accessibility 3.45, page 36 Previously developed land para 3..51, page 37	Fit for purpose
Policy 4		Spatial Strategy and Site Search Sequence para 3.37, page 34 Accessibility 3.45, page 36 Previously developed land para 3..51, page 37	Fit for purpose
Policy 5		Spatial Strategy and Site Search Sequence para 3.37, page 34 Accessibility 3.4 Previously developed land para 3..51, page 375, page 36 Previously developed land para 3..51, page 37	Fit for purpose
Policy 6		Spatial Strategy and Site Search Sequence para 3.37, page 34 Accessibility 3.45, page 36 Previously developed land para 3..51, page 37	Fit for purpose
Policy 7		Placemaking in Rural Areas (3.34) pg. 33 Development in the Countryside (3.56) page 39 Sustainable Transport (4.1.8) page 47 Accessibility 3.45, page 36	See below for specific verdicts on the policy criteria.
Countryside: Para 4.49 Reasoned Justification to Policy 7	Footnote 59: Refers to paragraph 9.3.6 of PPW9 – strictly controlling development in the countryside.	Development in the Countryside See Paragraph 3.56, page 39	The principle strictly controlling development in the countryside remains – see below on Policy 7 for detailed commentary. Update reference - see across. MAC
Countryside Policy 7 Criterion a) infill and rounding off.	Footnote 62 Paragraph 9.2.22	Paragraph 3.56: Development in the countryside <u>should be located within and adjoining those settlements</u> where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to <u>existing settlements</u> may be	The differences are: 1. The paragraph refers to more than just housing. 2. Referring to ‘ <u>existing settlements</u> ’ in conjunction with ‘infill and minor extensions.’ 3. Adding an additional possibility re increasing economic activity to justify infill and rounding off in those locations

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
		<p>acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity.</p> <p>However, new building in the <u>open countryside</u> away from <u>existing settlements</u> or <u>areas allocated for development in development plans</u> must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.</p>	<p>– ‘existing settlements’.</p> <ol style="list-style-type: none"> 4. There is no longer a reference to ‘isolated groups of dwellings’ which the National Park Authority relies on to allow infill and rounding off in countryside locations in LDP2. 5. There is no longer reference to ‘needing to take account of the pattern of development in the area and the accessibility to main towns and villages’. 6. When interpreting the PPW10 approach there will still be a need to define ‘existing settlements’ through an LDP process as they seem to differ in spatial hierarchy status to ‘those settlements’ (where a greater amount of development can best be accommodated). 7. The underlying principles to strictly control development in the countryside remains alongside the need to direct development where it can be best served in both LDP2 and PPW10. 8. The reference to the proposal increasing local economic activity is assumed to mean what the National Park Authority is/has been required to do under PPW 9 for economic development - see also Section 5.6. 9. PPW 9 includes the equivalent paragraph (to 3.56 of PPW10) at 4.7.8 and included paragraph 9.2.22 in PPW9 (refers to isolated dwellings) so it is difficult to argue that a contradiction arises with the approach set out in LDP2 now. 10. Para 3.45 of PPW 10 advises: ‘Spatial strategies should support the objectives of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport.’

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
Countryside Policy 7 Criterion b) housing for essential farming or forestry needs.	Footnote 63 Refers to paragraph 9.3.6 to 9.3.10 of PPW 9 which refers to policy for rural enterprise dwellings and TAN6 and rural enterprise dwellings.	Rural Enterprise Dwellings 4.2.36 to 4.2.37 – No change.	<p>Policy 7a) is considered fit for purpose.</p> <p>LDP 2 is wholly reliant on PPW for policy advice.</p> <p>MAC update reference - see across.</p> <p>The text of PPW10 still refers to the need to follow the Guidance in: Technical Advice Note 6, Planning for Sustainable Rural Communities (2010) https://gov.wales/topics/planning/policy/tans/tan6/?lang=en</p>
Countryside Policy 7 Criterion c) farm diversification including farm shops		4.3.42 – sets out criteria for farm shops. Rural Business Diversification – see paragraphs 5.6.8 to 5.6.11.	<p>Policy 46 fit for purpose.</p> <p>TAN6 paragraph 3.8 still applies for farm shops and 3.7 for farm diversification.</p>
Countryside Policy 7 Criterion d) conversion	Footnote 85 refers to paragraph 7.6.9 of PPW3 and how the Local Development Plan is interpreting what is meant by different terms used. LDP2 provides a local approach to	5.5.6 Planning authorities should also adopt a positive approach to the conversion of rural buildings for business re-use.	<p>LDP1 set out a localised approach to the conversion of rural buildings which sought to address particular local issues and experience from previous Plans – This is taken forward in LDP2 paragraph 4.52.</p> <p>The rationale for the tailored approach is clearly set out and justified through the Examination for LDP1.</p> <p>Any change in approach will need to come through debate at Examination for LDP2.</p> <p>Policy fit for purpose.</p>

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
	applying this policy.		
Policy 7h)		5.6.7 intensive livestock developments	<p>Adds to LDP approach with supporting SPG. Please also see: https://gov.wales/topics/planning/policy/dear-cpo-letters/intensive-poultry-units/?lang=en</p> <p>Add footnote to 7h) to the PPW10 reference across MAC.</p> <p>Any additional advice would come through in the review of SPG for Farm Buildings.</p>
Policy 7i)	Footnote Para 7.3.2	Para 5.6.4 Employment - locations for	Update PPW ref. MAC
Para 4.59 farm buildings	Reference to para 7.6.5	Para 5.6.6	Update PPW ref MAC
Para 4.60 Agricultural land	Reference to para 4.10	Para 3.54	Update PPW ref MAC
Policy 8 Special Qualities	Footnote 73 refers to Chapter 13 of PPW 9 and specifically pollution and paragraph 12.4.1 in terms of protection of water supply	<p>Sustainable Management of Natural Resources (3.32) pg. 33</p> <p>Green Infrastructure (6.2) pg. 129</p> <p>Landscape (6.3) pg. 131</p> <p>Biodiversity and Ecological Networks (6.4) pg. 134</p> <p>Air Quality and Soundscape (6.7) pg. 152</p> <p>Promoting Healthier Places (3.23)</p> <p>See above for references to pollution with water air and soil, waste water management.</p> <p>Noise pollution in Soundscape section 6.7</p> <p>Also air borne pollution with transport 4.1.14, noise pollution with transport assessment 4.1.56.</p>	<p>Biodiversity: Policy 8 remains valid.</p> <p>See above under Objectives for advice/ for references to pollution and to water supply, soil.</p> <p>Update PPW ref for Footnote 73 to refer to Chapter 6 of PPW10 sections 6.6 to 6.9. Update Circular Reference .MAC</p>
Policy 8d)	Footnote 74 Historic Environment and	See - Recognising the Special Characteristics of Places 6.1 The Historic Environment	Update PPW ref MAC


LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
	Archaeology sections of PPW9		
Policy 8e)	Footnote 75 Eco systems	Chapter 6	Update PPW ref MAC
	Footnote 81 refers to paragraph 5.7.2 regarding need to avoid development of the undeveloped coast.	6.5 Coastal Areas Development on the Coast 6.5.9 – relies on TAN Technical Advice Note (Wales) 14, Coastal Planning, Welsh Office, 1998. Development should not normally be proposed in coastal locations unless it needs to be on the coast. Directing to the developed areas but avoiding areas likely to subject to coastal change	LDP2 policies 17, 18, 33 and 35 are still appropriate. Additional wording re climate change supportive in terms of looking at proposals along the developed coast. Very in tune with the National Park Authority's approach. Update PPW ref MAC
Biodiversity 	Paragraph 4.72 of the Plan – Relies on national planning policy as well as Plan policy for nature conservation (including Sites of Special Scientific Interest, Special Protection Areas and Special Areas of Conservation)	Biodiversity Generally a focus on providing opportunities to protect <u>and enhance</u> . Section 6.2 refers to Green Infrastructure which is picked up more in the replacement Local Development Plan (2). Implementing the Section 6 Duty Referencing to Section 7 habitats and species lists. Designated Sites start at page 137. Protected Species begins in page 141. Trees, Woodlands and Hedgerows (6.4.24) page 142 Trees, Woodlands and Hedgerows near the bottom of 142.	There is a greater emphasis on 'enhancing' in PPW10. The National Park Authority is currently drafting a Biodiversity SPG that will fit under LDP2. Greater clarity is provided on sites and species of local importance. Reference to Section 7 species and habitats. MAC needed to: <ul style="list-style-type: none">▪ Para 4.66 to refer to the Nature Recovery Action Plan for Pembrokeshire▪ Para 4.72 to refer to Section 7 sites and habitats▪ Policy 12 to refer to areas rather than sites of nature conservation to avoid confusion regarding formal designation and illustration on the Proposals Map.▪ Just below Para 4.74 - put in the criteria for selecting areas of local importance▪ Para 4.76 to refer to the Nature Recovery Action Plan

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
			for Pembrokeshire. Trees are protected in PPW10, in the Biodiversity policies of the Plan and Policy 8 and 15. Policies fit for purpose.
Policy 9		Lighting (6.8) pg. 157	Policy fit for purpose
Policy 10		European	Fit for purpose.
Policy 11		National	Fit for purpose.
Policy 12		Biodiversity and Ecological Networks (6.4) pg. 134	See for Biodiversity above
Policy 13		Biodiversity and Ecological Networks (6.4) pg. 134	See for Biodiversity above
Policy 14		Welsh Language and Placemaking (3.25) pg.32	Policy fit for purpose.
Historic Environment	4.87 of the LDP relies on Planning Policy Wales, Edition 9,	The Historic Environment (6.1) pg. 123	MAC add reference to townscape and update cross references to PPW10. Rely on the up to date advice in PPW10.
		Historic Parks and Gardens	LDP2 relies on PPW
Policy 15		Buildings of Local Importance	LDP2 has a locally distinct policy – fit for purpose
Policy 16		Landscape 6.36 of PPW10 great weight to the statutory purposes of National Parks.	Fit for purpose.
Para 4.93	5.36 PPW9	6.35 onwards	Fit for purpose. Update PPW ref MAC
Policy 17	Paragraph 4.101	Recreational Spaces (4.5) pg. 70	Rely on PPW10 for the latest advice in conjunction with LDP2.

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
Open Space Playing Fields Green Wedges	and 4.105 of the LDP advises that Planning Policy Wales, Edition 9 sets out clear statements of national development control policy on formal and informal open space, playing fields and green wedges.	Promoting Healthier Places (3.20 & 3.23) Managing Settlement Form (3.67) page 41 Rely on PPW10 for the latest advice in conjunction with LDP2. Strong emphasis on the protection of Green Wedges Paragraph 3.69 onwards.	MAC Update paragraph references. The Open Spaces and Green Wedges are shown on the Proposals Map and any review of approach to mapping will have to come through LDP2. The designation of Open Space and Green Wedges is done through LDP review – a matter for debate at Examination. Welsh Government has raised concerns regarding the approach taken with Green Wedges. The approach that we currently take seems to be unchanged.
Coast Policy 18	Paragraph 4.106 advises that Planning Policy Wales 9 sets out clear statements of national development control policy on the coast and coastal defence work.	Coastal Areas (6.5) pg. 143 Starts Page 143 6.5.2 Reference to the Marine Plan (yet to be agreed) followed by references to interactions between land and sea. 6.5.9 Directing development to developed parts of the coast. There is a substantive section here to read/reflects the emerging approach we have been taking in LDP2 and in how we have been advising Members on applications where there is a risk of flooding.	Policy 18 fit for purpose. MAC update paragraph reference to PPW10 section 6.5.
Policy 19		Ports, Harbours, Marinas etc. 5.3.14, page 81	Policy 19 fit for purpose MAC insert cross reference to paragraph 5.3.14 to 5.3.16.
Major Development	Paragraph 4.118 of the LDP refers to PPW9 for the	Paragraph 6.3.10 – looks the same Paragraph 5.14.35 – test for minerals in National Parks	Para 4.118 MAC update references major development test.

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
	definition of major development		
Policy 20		Hazardous Installations 5.4.13 – last bullet page 84	Policy 20 fit for purpose.
Para 4.132 e)	Paragraph 14.3.2	5.14.35	MAC update reference major development test.
Policy 21			Strategic Policy to address scale of growth suitable for the National Park. Fit for purpose
Major development test	Footnotes 93 & 94 refers to PPW9 for the definition of major development	Paragraph 6.3.10 – looks the same Paragraph 5.14.35 – test for minerals in National Parks	MAC update reference major development test.
Para 4.133	Refers to PPW9 for the definition of major development	Paragraph 5.14.35 – test for minerals in National Parks	MAC update reference major development test.
Minerals 4.137 and footnote 99	of the Plan refers to PPW9	Minerals (5.14) pg. 105	MAC update reference major development test.
Policy 22		5.14.2 Safeguarding of minerals	Policy 22 with Supplementary Planning Guidance fit for purpose.
Policy 23		Buffer Zones 5.14.44, page 115	Policy 23 fit for purpose.
Para 4.139	Refers to 14.4.1 of PPW9	See directly above	MAC update reference
Policy 24		Borrow Pits 5.14.33	Policy 24 fit for purpose.
Policy 24f)	Footnote 104 of the Plan refers to PPW9	5.14.34	MAC update reference
Policy 25	Criterion e) footnote refers to 14.3.2	Local Building Stone 5.14.35	Policy 25 fit for purpose MAC update reference
Waste	Paragraph 4.118	Sustainable Management of Natural Resources (3.32) pg.	Fit for purpose.

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
	states that the National Park is exempt from providing new facilities for the managements of waste that serves more than one local authority area under the South West Regional Waste Plan 1 st Review (Aug 2008)	<p>32 Waste (Making Best Use of Material Resources and Promoting the Circular Economy) (5.11) pg.99</p> <p>5.11 Places emphasis on the Circular Economy principles that should underpin all developments.</p> <p>5.13 emphasises the role that the planning system has to play in facilitating sustainable waste management and a clear waste hierarchy.</p> <p>5.13.7 refers to the Collections, Infrastructure and Markets (CIM) Sector Plan 2012 indicating a move towards the reduction of disposal and recovery options in favour if high volume source segregated collection followed by reprocessing as well as preparation for re-use and prevention.</p>	
Policy 26			Fit for purpose
Policy 27			Fit for purpose
Para 4.150	Refers to paragraphs 13.9.1 to 13.9.2 of PPW9.	Chapter 6 for unstable land	MAC update reference
Para 4.151	Refers to PPW9		MAC update reference
Policy 28			Fit for purpose
Policy 29			Fit for purpose
Policy 30 Sustainable Design		<p>Good Design (3.3) pg. 26</p> <p>Promoting Healthier Places (3.20 & 3.22)</p> <p>Active and Social Streets (4.1.18) page 49</p> <p>Active Travel (4.1.33)</p> <p>Public Transport (4.1.35) page 51</p> <p>Active and Social Streets 4.1.18, page 49</p> <p>Ultra Low Emission Vehicles (4.1.39) page 51</p>	<p>Fit for purpose</p> <p>But need to also consider paragraph 4.1.39 for Ultra Low Emission Vehicles parking provision on non-residential development. SPG preparation input required from Highways.</p> <p>Design Guidance: Active Travel (Wales) Act 2013</p>

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
		<p>Traffic Management (4.1.43) page 53 Car Parking (4.1.50) page 53 Reduce Energy Demand and Use of Energy Efficiency 5.8 page 90 Water and Flood Risk (6.6) page 146</p>	<p>https://beta.gov.wales/active-travel-design-guidance Listed alongside the Manual for Streets 2 , Design Bulletin 32</p>
Policy 31		<p>Promoting Healthier Places (3.20) Air Quality and Soundscape (6.7)</p>	<p>Policy 30 remains fit for purpose with extensive additional guidance on Air Quality and Soundscape provided in PPW.</p>
Policy 32		<p>5.12.9, page 102</p>	<p>Fit for purpose</p>
Policy 33		<p>Active and Social Streets (4.1.18) page 49 Sustainable Drainage Systems (6.6.17) page 150</p>	<p>Policy 33 is fit for purpose.</p>
Policy 34 		<p>PPW 10 no longer includes reference to categories of renewable energy. See note: Renewable Energy PPW 9 and PPW 10.docx</p>	<p>MAC to remove reference to putting renewable energy developments in different categories in reasoned justification. This will be an area of debate for Examination – WG representation.</p>
Policy 34		<p>Footnote 122 Reference to Planning Policy Wales paragraph 12.8.9.</p>	<p>MAC update to refer to paragraph 5.7.18 of PPW10.</p>
Policy 34 Renewable Energy	<p>Plan relies on a tailored approach that has been progressed through LDP Examination.</p>	<p>Energy (5.7) pg. 87 Renewable and Low Carbon Energy 5.9 page 91</p> <p>5.9.17 Planning authorities should give significant weight to the Welsh Government's targets to increase renewable and low carbon energy generation, as part of our overall approach to tackling climate change and increasing energy security. <u>In circumstances where protected landscape, biodiversity and historical designations and buildings are considered in the decision making process, only the direct irreversible impacts on statutorily protected sites and buildings and their settings (where appropriate) should be considered.</u> In all cases, considerable weight should be attached to the need to produce more energy from</p>	<p>Policy 34 is fit for purpose. SPG to be prepared. No change needed.</p> <p>National Park purposes are set out in primary legislation.</p> <p>When taking account of the paragraph across also bear in mind PPW refers to National Park status being given 'great weight' - para 6.3.6 - whereas the weight to be given to the WG targets are lesser in status... 'significant weight' and 'considerable weight'</p> <p>Oxford Dictionary: Significant means 'sufficiently great or important to be worthy of attention; noteworthy.'</p>

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
		renewable and low carbon sources, in order for Wales to meet its carbon and renewable targets.	<p>Considerable weight: 'notably large in size, amount, or extent' 'versus'</p> <p>Great weight: 'Of an extent, amount, or intensity considerably above average.'</p> <p>Please also note TAN 8 - 8.4: There is an implicit objective in TAN 8 to maintain the integrity and quality of the landscape within the National Parks/AONBs of Wales i.e. no change in landscape character from wind turbine development.</p> <p>Note for SPG2 await final version: Landscape Sensitivity and Capacity NRW Consultation Draft August 2018 – page 46.</p>
Para 4.187	Para 5.7.2 of PPW9	Para 6.5.9 of PPW10	MAC update reference
Policy 35 Flooding & Coastal Inundation	Footnote refers to national policy prescriptions in relation to dealing with flooding and coastal inundation	<p>Sustainable Management of Natural Resources (3.32) pg. 33</p> <p>Water and Flood Risk (6.6) pg. 146</p> <p>Water Quality and Surface Water Flooding 6.6.14</p> <p>Development and Flood Risk 6.6.22 onwards Technical Advice Note 15, Development and Flood Risk, Welsh Assembly Government 2004</p> <p>www.wales.gov.uk/topics/planning/policy/tans/tan15%3Flan%3Den</p>	<p>The policy is fit for purpose.</p> <p>MAC update reference in footnote 131.</p>
Policy 36			Fit for Purpose
Policy 37			Fit for purpose.
Policy 38			Fit for purpose.
Policy 39		Tourism (5.5) pg.85	Local justification for the Policy and supporting SPG fit for

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
		The Rural Economy (5.6) pg. 86	purpose.
Policy 40			Local justification for the Policy and supporting SPG fit for purpose.
Policy 41			Locally prescribed policy. Fit for purpose.
Para 4.219	Footnote 136	Refers to the definition of open market housing and affordable housing.	Paragraph 4.2.26 and 4.2.30 Planning Policy Wales, Edition 10, December 2018 has been clarified with Welsh Government The term 'local authority' includes 'local planning authority.' MAC to the footnote is proposed to clarify this point.
Policy 42			Locally prescribed policy. Fit for purpose.
Policy 43			Locally prescribed policy. Fit for purpose.
Employment developments in rural areas	4.183 relies on Planning Policy Wales	5.6 Economic Development (5.4) pg. 83 The Rural Economy (5.6) pg. 86 The Rural Economy provides advice about the principal of allowing within <u>and adjacent to settlements</u> , <u>allowing the expansion of business in the countryside</u> . LDP 2 picks up on this approach.	Fit for purpose
Policy 44			Fit for purpose
Para 4.243	Refers to Chapter 7 of PPW9	Refer to Chapter 5.	MAC update reference
Policy 45			Fit for purpose
Policy 46		Rural Business Diversification Para 5.6.8 Farm diversification	Fit for purpose.
Housing		Housing (4.2) pg. 54	
Policy 47		Para 4.2.3 Housing Requirement Para 4.3.10 Housing Delivery	Fit for purpose.
Policy 48		Para 4.2.3 Housing Requirement Para 4.3.10 Housing Delivery	Fit for purpose
Para 4.290	PPW9 9.2.17	PPW 10 4.2.31	Update para reference MAC

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
Policy 49		Affordable Housing 4.2.25, page 59	The Policy is the framework for negotiating affordable housing.
Policy 49	Footnote 163 exceptional land releases for affordable housing to meet the needs of local people. Paragraph 9.2.23	4.2.34	Reads the same as before. Update para reference MAC
Policy 50		4.2.1 & 4.2.29 mix of housing Refers to 'appropriate development density' page 20, 72,167, Para 4.2.11 – full range of housing types. Older people/people with disabilities. Lifetime homes standards. 4.2.12 A range of site types Para 4.2.13 Prepare a site register 4.2.14 Self build	Policy is fit for purpose. The policy provides a framework for evidence to support the mix and design of housing required. Working with Pembrokeshire County Council on a new Local Housing Market Assessment. See also Equalities Impact Assessment commentary on this issue. Sites of different sizes are included. This would be done outside the Plan. Discuss with Pembrokeshire County Council regarding this. The Authority is willing to work with a developer/owner with an interest in self build.
Policy 51		Gypsy and Travellers (4.2.35)	The paragraph in PPW refers to the new Circular 005/2018 in the footnote the interpretation of which, in terms of assessing proposals, differs between this LPA and WG (it will be the subject of discussion at the Examination in terms of LDP2) This relates to criterion a) only.
Policy 52		One Planet Developments (4.2.38) page 61	Policy 52 fit for purpose alongside national planning policy and

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
			the SPG.
Policy 53		Community Facilities (4.4) pg. 70 Supporting Infrastructure (3.57 page 39 Local and Village Shops (4.3.40) page 68	Policy 53 fit for purpose alongside the SPG.
Retail	Para 4.314 of the Plan advises to rely on Planning Policy Wales, Edition 9 sets out clear statements of national development control policy on out of town retailing, amusement arcades, farm shops, local shops, village shops and pubs. It also provides advice on factories and other businesses selling produce and retailing at petrol stations. The footnote number is 170	Retail and Commercial (4.3) pg. 62	See below. The LDP's retail hierarchy is defined through the LDP process (no change needed). Policies on retail fit for purpose. Update para reference MAC
Policy 54	Footnote 172 relies on Chapter	Section 4.3.10	See above and below Policy 54 fit for purpose. Update para reference MAC

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
	10 of PPW9		
Para 4.316	PPW9 Chapter 10	Chapter 4	Update para reference MAC
Policy 55 Town and District Shopping Centres		Mixed Uses and Primary and Secondary Shopping Areas 4.3.30. The development control policy approach set out in PPW10 is a 'town centres first' policy in relation to new retail and commercial centre development (4.3.15) If suitable sites or buildings are not available within the hierarchy, consideration should be given to edge of centre sites and if no such sites available, only then should out-of-centre sites in locations that are accessible by a choice of travel modes, including active travel and public transport, be considered (4.3.19) Paragraph 4.3.40 refers to Local and Village Shops, including shops ancillary to other uses, such as farm shops. The Importance of Evening and Night Time Economies (Para 4.3.43) page 69	The LDP's retail hierarchy is defined through the LDP process. Any change to that would be through the new LDP (no change justified). Policy 55 is fit for purpose.
Policy 56			Policy fit for purpose.
Traffic	Para 4.239 advises Planning Policy Wales, Edition 3 sets out clear statements of national development control policy on traffic management, transport	Transport (4.1) pg. 46 Active Travel (4.1.33) Public Transport (4.1.35) page 51 Ultra Low Emission Vehicles (4.1.39) page 51 Traffic Management (4.1.44) page 53 4.1 Transport – reduce reliance on the car. includes reference to Ultra Low Emissions Vehicles in the hierarchy - Use the sustainable transport hierarchy for Plans and applications = 4.223 - locate development where there is or could be good access by public transport.	Incorporating Active Travel opportunities in development. (see Design Policy above) Cycle parking standards in current SPG will require review. Much stronger emphasis on reducing the need to travel and particularly by car. <u>Requirement</u> to use the sustainable transport hierarchy in relation to new development. This should be used to reduce the need to travel, prevent car-dependent developments in unsustainable locations and support active and sustainable travel. Development <u>must</u> be directed to locations most

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
	considerations in development control, transport assessments and travel plans and access to development.	- Para 4.1.39 Ultra Low Emission Vehicles: encourage and support provision. Non-residential developments should have 10% of car parking spaces to have ULEV charging points (1 in 10 car parking spaces).	accessible by public transport. See across regarding parking and ULEVs (need to discuss with PCC re the best way forward – through the review of SPG). MAC not needed.
Policy 57		Transportation Infrastructure (5.3) pg. 79 Active Travel (4.1.33) Public Transport (4.1.35) page 51 Car Parking (4.1.51) Traffic Management (4.1.43)	Policy 57 continues to be fit for purpose. But see above regarding additional requirements in relation to ULEVs and parking.
Policy 58		Promoting Healthier Places (3.21 & 3.22) Transport Assessments (4.1.56)	Policy 58 continues to be fit for purpose.
Policy 59		Active Travel 4.1.25, page 49 4.1.32 cycle ways/Active Travel	See above under Traffic. Policy fit for purpose
Utility Services	4.336 Planning Policy Wales, Edition 9 sets out clear statements of national development control policy on water supply and quality and waste water management. Chapter 12	Now in Chapter 6.	Update para reference MAC
Policy 60		Supporting Infrastructure 3.57, page 39 5.7.8	Policy 60 fit for purpose.

LDP Topic/ Policy Area	LDP2 Ref	Planning Policy Wales Edition 10	Verdict
		<p>Electricity Grid Network and Energy Storage</p> <p>5.7.9</p> <p>5.9.18</p>	
Policy 61		<p>Telecommunications (under Electronic Communications) (5.2) pg. 77</p> <p>5.2.5 onwards Mobile Telecommunications</p> <p>5.2.8 Actively engaging with mobile operators re lack of coverage.</p> <p>Efficient Use of Telecommunications Infrastructure 5.2.11</p> <p>5.2.17 onwards – Fixed Line Broadband.</p> <ul style="list-style-type: none"> - Be supportive - New development proposals <u>should</u> include the provision of broadband. We are to support and encourage it. - Include policies on the need for broadband and its improvement and replacement. 	<p>Policy 61 Telecommunications fit for purpose.</p>
Glossary of Terms Brownfield	Figure 4.4 of PPW9 referred to	<p>Previously Developed Land starts at paragraph 3.51, page 37</p> <p>Definition is on page 38.</p>	<p>LDP2 relies on the national planning policy definition.</p> <p>See section and definition and reference across. There are tweaks to the definition from PPW9:</p> <p>Second bullet reference to 'in built up areas' deleted</p> <p>Third bullet: Typo? 'And' instead of 'land' at the beginning of the sentence. WG confirmed typo 25th March 2019.</p> <p>Fourth bullet: Typo? 'And' instead of 'land'. Bullet reworded as well. WG confirmed typo 25th March 2019</p> <p>Notes: edits to Note 2 and a new Note 3</p> <p>Update PPW ref MAC</p>

SUSTAINABILITY APPRAISAL OBJECTIVES AND PPW 10 PLACEMAKING OUTCOMES

12. The sustainability objectives have already been appraised against the well-being goals. The table below shows the relationship between the sustainability objectives of the Sustainability Appraisal and the National Sustainable Placemaking Outcomes.

TABLE 3 SUSTAINABILITY OBJECTIVES AND PLACEMAKING OUTCOMES

Number	Sustainability Objective
1	Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.
2	Locate developments so as to minimise the demand for travel, especially by private car
3	Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park
4	Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.
5	Increase the number of visitors using the National Park outside the peak visitor season.
6	Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.
7	Reduce factors contributing to climate change.
8	Maximise the contribution of opportunities for development to sustaining local communities.
9	Encourage access for all to the National Park, reflecting the social mix of society.
10	Maintain the cultural distinctiveness of communities.
11	The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.
12	Reduce the negative impacts of waste.
13	Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population
14	Maintain and enhance biodiversity both within and outside designated sites
15	Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

✓ Compatible; × Incompatible; 0 Neutral; - No substantive relationship

Placemaking outcomes	Sustainability Appraisal Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Creating and Sustaining Communities															
Enables the Welsh language to thrive	-	-	-	-	-	-	-	✓	-	✓	-	-	✓	-	-

March 2019 Local Development Plan 2 and Planning Policy Wales 10 December 2018

	Sustainability Appraisal Objectives														
Placemaking outcomes	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Appropriate development densities	-	-	✓	-	-	-	-	✓	-	✓	-	-	-	-	-
Homes and jobs to meet society's needs	-	-	-	-	-	-	-	✓	-	-	-	-	-	-	-
A mix of uses	-	-	-	-	-	-	-	✓	-	-	-	-	✓	-	-
Offers cultural experiences	-	-	✓	-	-	-	-	✓	✓	✓	-	-	✓	-	-
Community based facilities and services	-	✓	-	-	-	-	-	✓	-	-	-	-	✓	-	-
Growing Our Economy in a Sustainable Manner															
Fosters economic activity	✓	-	-	-	✓	-	-	✓	-	-	-	-	✓	-	-
Enables easy communication	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Generates its own renewable energy	-	-	-	-	-	-	✓	-	-	-	-	-	-	-	-
Vibrant and dynamic	✓	-	-	-	✓	-	-	✓	-	-	-	-	-	-	-
Adaptive to change	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-
Embraces smart and innovative technology	-	-	-	-	-	-	-	-	✓	-	-	-	-	-	-
Making Best Use of Resources															
Makes best use of natural resources	✓	-	-	-	-	-	✓	✓	-	-	✓	✓	-	✓	✓
Prevents waste Prioritises the use of previously developed land and existing buildings	-	-	-	-	-	-	✓	✓	-	-	✓	✓	-	-	-
Unlocks potential and regenerates	-	-	-	-	-	-	-	✓	✓	-	✓	-	-	-	-
High quality	-	-	✓	-	-	-	-	-	-	-	-	-	-	-	-

	Sustainability Appraisal Objectives														
Placemaking outcomes	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
and built to last															
Maximising Environmental Protection and Limiting Environmental Impact															
Resilient biodiversity and ecosystems	✓	-	✓	-	-	✓	✓	-	-	-	✓	-	-	✓	✓
Distinctive and special landscapes	✓	-	✓	✓	-	-	-	-	-	-	✓	-	-	✓	-
Integrated green infrastructure	-	✓	-	-	-	✓	✓	-	-	-	-	-	-	✓	-
Appropriate soundscapes	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	-
Reduces environmental risks	-	✓	-	-	-	✓	✓	-	-	-	-	✓	✓	-	✓
Manages water resources naturally	-	-	-	-	-	✓	✓	-	-	-	-	-	-	-	✓
Clean air Reduces overall pollution	-	✓	-	-	-	-	✓	-	-	-	-	✓	-	-	✓
Resilient to climate change	-	-	-	-	-	✓	-	-	-	-	-	-	-	-	-
Distinctive and special historic environments	-	-	✓	-	-	-	-	-	-	✓	-	-	-	-	-
Facilitating Accessible and Healthy Environments															
Accessible and high quality green space	✓	✓	✓	-	-	✓	✓	-	-	-	-	-	✓	✓	-
Accessible by means of active travel and public transport	-	✓	-	✓	-	-	✓	-	✓	-	-	-	-	-	-
Not car dependent	-	✓	-	✓	-	-	✓	-	✓	-	-	-	-	-	-
Minimises the need to travel	-	✓	-	✓	-	-	✓	-	-	-	-	-	-	-	-
Provides equality of access	-	✓	-	-	✓	-	-	-	✓	-	-	-	✓	-	-
Feels safe and inclusive	-	-	-	✓	-	-	-	✓	✓	✓	-	-	✓	-	-

	Sustainability Appraisal Objectives														
Placemaking outcomes	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Supports a diverse population	-	-	-	-	-	-	-	✓	✓	✓	-	-	✓	-	-
Good connections	-	✓	-	-	-	-	-	✓	-	-	-	-	-	✓	✓
Convenient access to goods and services	-	✓	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	-
Promotes physical and mental health and well-being	-	✓	✓	✓	-	-	-	✓	✓	-	-	-	✓	-	-