

WELSH GOVERNMENT
Examination Hearing
Statement

Pembrokeshire Coast National Park Authority
Local Development Plan

Matter 1

Plan Preparation and Strategy

2 July 2019

Matter 1: Plan Preparation and Strategy

Issue – Is the Local Development Plan legally compliant, and is the LDP Strategy justified and likely to be effective in ensuring that development needs of the Pembrokeshire Coast National Park can be met throughout the Plan period in a way that contributes to the achievement of sustainable development?

Plan Preparation

1. Has the Plan been prepared in accordance with the necessary procedural requirements?

a) Has the Plan been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme?

This is a matter for the Local Planning Authority (LPA).

b) Has the Plan been subject to a robust Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment / Appropriate Assessment?

This is a matter for the LPA.

c) Has the Plan been informed by a robust consideration of reasonable alternatives?

This is a matter for the LPA.

d) Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015?

This is a matter for the LPA.

e) Has the Plan been subject to an Equality Impact Assessment?

This is a matter for the LPA.

2. Does the Plan provide an accurate and consistent description of the Plan area?

a) Is the format of the Plan, particularly in relation to the numbering of strategic and non-strategic policies, referencing in policies and use of footnotes, clear and consistent?

We do not have any issues to raise in this respect.

Vision, Objectives and Strategy

3. Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2031?

This is a matter for the LPA.

a) Was the Vision reviewed as part of the replacement plan making process,

and has it had regard to the NPA Management Plan and Single Integrated Plan?

This is a matter for the LPA..

4. Are the Plan's objectives SMART and capable of delivering on the identified Vision?

a) Were they reviewed as part of the replacement plan making process?

This is a matter for the LPA.

b) Should Objective E be amended to make reference to the need to sustain local communities?

This is a matter for the LPA.

5. Does the Plan's Strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

a) Should the Plan include a Key Diagram?

As stated in our representation to the Focussed Changes consultation, the key diagram should be within the plan, not the proposals map. The authority has indicated in their consultation report (NPA023) they do not object to making this change as a Matters Arising Change (MAC). We would support this.

b) How has the Strategy been derived, was it reviewed as part of the replacement plan making process and is it based on robust evidence?

This is a matter for the LPA.

c) What are the key components of the Strategy and how do they interact?

This is a matter for the LPA.

d) Will the Strategy deliver the Vision and Objectives?

This is a matter for the LPA.

e) How have the spatial and growth elements of the Strategy been derived, and should they be expressed in specific strategy policies?

This is a matter for the LPA.

f) Does the Strategy represent a sustainable approach to planning, over the plan period, and does it effectively link transportation, employment and residential growth?

This is a matter for the LPA.

g) Has the Strategy been informed by the findings of the local housing market assessments?

This is a matter for the LPA.

h) Does the Strategy maximise the use of previously developed land? and adopt the sequential approach to the release of land as set out in Planning

Policy Wales?

It is a matter for the LPA to demonstrate they have accorded with national policy when considering and identifying sites for development.

i) Is the Strategy and policy framework consistent with national policy relating to Flood Risk?

This is a matter for the LPA. The authority must ensure that in order to comply with national policy, no highly vulnerable development (including access and egress issues) is allocated in zone C2.

6. Is the Plan's Strategy consistent/compatible the following plans and strategies?

a) The Wales Spatial Plan and other national policy?

The Welsh Government does not have any specific concerns. The Welsh Government considers that the broad strategy and principles set out in the Wales Spatial Plan have been reflected in the LDP.

b) Regional plans and strategies?

This is a matter for the LPA.

c) The plans/strategies of neighbouring authorities? and

This is a matter for the LPA.

d) Does the Plan reflect the strategies and proposals of infrastructure providers?

This is a matter for the LPA. The authority should demonstrate when allocations are expected to come forward, what infrastructure is required and who is responsible for delivering the funding.

7. How has the Settlement Hierarchy been derived, and is it based on robust evidence?

a) Has the Settlement Hierarchy been reviewed as part of the replacement plan making process?

This is a matter for the LPA.

b) Is the structure of the Settlement Hierarchy locally distinct?

This is a matter for the LPA.

c) Are the requirements of Policy 2 clear, does it provide an appropriate framework for new development in Tenby Local Service and Tourism Centre, and should it make reference to the suggested need for a marina and the enhancement of St Catharine's Island?

This is a matter for the LPA.

d) Do the requirements of Policy 5 provide a clear and appropriate mechanism for managing development in St David's Local Centre?

This is a matter for the LPA.

e) Are the requirements of Policy 6 clear, does it provide an appropriate framework for managing development in rural areas, and should the requirements of the first sentence of paragraph 4.46 be included in the Policy?

This is a matter for the LPA.

f) Are the requirements of Policy 7 clear and does it provide an appropriate framework for managing development in the Countryside?

This is a matter for the LPA.

8. Is the approach to site selection sufficiently clear and transparent, and is it founded on a robust evidence base?

This is a matter for the LPA.

a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?

This is a matter for the LPA.

b) Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?

The plan must demonstrate that the relevant infrastructure can be delivered at an appropriate timescale to enable the delivery of housing in line with the timings set out in the housing trajectory.

9. Will the requirements of the Flood and Water Management Act 2010, in respect of sustainable drainage systems have an impact on the development capacity, viability and/ or deliverability of allocated sites?

This is a matter for the LPA. The Welsh Government's position is that SUDs is cost neutral on new development.

11. Will the Plan be supported by Supplementary Planning Guidance?

This is a matter for the LPA. SPG which is crucial to the implementation of key sites or policies in the LDP should be identified in the Plan and available on adoption. Information on the preparation of SPG should be referenced in the monitoring framework.