

Pembrokeshire Coast National Park

Local Development Plan (2015-2031)

Session 1

Tuesday 2nd July 2019 9.30 am

**Opening, Plan Preparation and Plan
Strategy**

Hearing Statement

Jane Gibson (Opening Statement), Martina Dunne, Sarah Hirst,
Stephen Bengler (Pembrokeshire County Council (written submission only – included
here for ease of reference))

Bring to the session – paper (note web access available):

- Vision and Objectives BP NPA070
- Review Report NPA002
- Scale & Location of Growth BP NPA036
- Alternative Options & Appraisal BP NPA057

June 2019

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY**

Session/Matter 1 – Plan Preparation and Strategy Tuesday 2nd July 2019 9.30am	
<i>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?</i>	MD
Plan Preparation	
1. Has the Plan been prepared in accordance with the necessary procedural requirements?	
<p>NPA Response: The LDP has been prepared in accordance with the statutory procedures under Section 64(5) (a) of the 2004 Act and associated regulations. Section 64(5) of the 2004 Act asks that the requirements of Sections 62 and 63 and regulations under Section 77 are satisfied.</p> <p>Section 62 sets out 9 subsections on the Local Development Plan.</p> <p>The Plan has been prepared in accordance with each of the subsections of Section 62 where they are relevant. The exceptions are:</p> <ul style="list-style-type: none"> ▪ Subsection (3A) (a) and (5) requires the publication of the National Development Plan Framework for Wales which has not been published at this time. ▪ Subsection (3A) (b) and 5(ba) requires compliance with any relevant strategic development plan. None have been prepared for West Wales at this time. ▪ Subsection 5(bb) requires the publication of Area Statements under the Environment Wales Act 2016 which have not been prepared at this time. ▪ Subsection 5(c) refers to a Regional Spatial Strategy in the region which does not exist. ▪ Subsections 8 and 9 refer to the Plan at the point of adoption and when Local Development Plans expire. ▪ Section 63 refers to preparation requirements which are set out in 7 subsections. ▪ Subsection (1)(a) asks is the Plan compliant with the Authority’s Community Involvement Scheme (see question below)? <p>The Plan has been prepared in accordance with the Community Involvement Scheme as set out in the Delivery Agreement - NPA001 - to date. The Inspector may wish to note that 2 venues were closed down that had been advertised as being available to view the</p>	

<p>documentation – Tenby (31st March 2017) and Newport Information Centres (9th November 2018). The Authority sought to assist those that required paper copies of documents as a result.</p> <ul style="list-style-type: none"> ▪ Subsection (1)(b) asks that the Authority is compliant with the timetable for preparation of the Local Development Plan? The answer is yes. The Inspector may wish to note that the Authority has needed to take advantage of the 2 months slippage allowance when progressing the Plan. The subsection also asks regarding the timetable for adoption of the Local Development Plan which is programmed for the end for the end of 2019/New Year 2020. This will need to be confirmed or otherwise at the close of the Hearing Sessions. ▪ Subsection (2) and (3) relates to who has been engaged and whether the Authority acted in accordance with the Assembly’s prescriptions. Appendix 4 of the Delivery Agreement sets out the main consultee groups that were engaged and is compliant with Annex B of the Local Development Plan Manual 2015. ▪ Subsection (4) and (5) and (6) refers to need to agree the Delivery Agreement with the Assembly (or be directed to change it). It was agreed on 25th July 2016 without the need for a Direction. ▪ Subsection (7) refers to the how a Delivery Agreement should be prepared as prescribed by the Assembly. The Authority has complied with the procedures set out in the Regulations and in the Local Development Manual. PGD01 <p>Section 77 refers to the Assembly preparing Regulations on the preparation of Local Development Plans. Two sets of Regulations are relevant the 2005 and 2015 Regulations. The Local Development Plan preparation has been prepared in accordance with both.</p> <p>The Consultation Report provides further detail on compliance. NPA017</p>	
<p>a) Has the Plan been prepared in accordance with the Delivery Agreement, including the Community Involvement Scheme?</p>	
<p>NPA Response: Yes the Plan has been prepared in accordance with the Community Involvement Scheme as set out in the Delivery Agreement to date - NPA001. Please see response above for more detail.</p>	
<p>b) Has the Plan been subject to a robust Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment/Appropriate Assessment?</p>	

<p>NPA Response: Yes. A Scoping Report and an Appraisal for the Preferred Strategy and Deposit Plan (NPA008 to NPA014) has been undertaken. The implications of the Focussed Changes have also been considered in NPA022 – Focussed Changes November 2018. The Sustainability Appraisal includes the Strategic Environmental Appraisal. A Habitats Regulation Assessment has also been undertaken (NPA015).</p>	
<p>c) Has the Plan been informed by a robust consideration of reasonable alternatives?</p>	
<p>NPA Response: The Sustainability Appraisal sets out the assessment of various alternative policy options. In summary each of the strategy policies have had more than one policy option considered (except for Policy 1 which relies on National Park legislation and Policy 57 Sustainable Transport where issues raised didn't suggest a need consider more than one policy option).</p> <p>Please see paragraph 4.10 of Exam 6 (Local Development Plan 2 Focussed Changes and PPW10 edits) for more information also.</p> <p>The Alternative Options & Appraisal Background Paper provides a further appraisal of options in terms of the soundness tests (NPA057).</p>	
<p>d) Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015?</p>	
<p>In complying with the Well-being of Future Generations Act the Plan's preparation has been primarily guided through the application of the Act via:</p> <ul style="list-style-type: none"> ▪ The Sustainability Appraisal (NPA008 to NPA014) ▪ The Equalities Impact Assessment (NPA016) ▪ The defining of the Vision and objectives of the Plan (NPA070) ▪ The application of Planning Policy Wales 9 and 10 (through potential Matters Arising Changes). (Exam05 and Exam06) ▪ The Pembrokeshire Local Wellbeing Plan itself. 	
<p>e) Has the Plan been subject to an Equality Impact Assessment?</p>	
<p>NPA Response: Yes (NPA016)</p>	
<p>2. Does the Plan provide an accurate and consistent description of the Plan area?</p>	
<p>NPA Response: Yes. The Authority has sought through the first and second Plan to provide a Park Portrait identifying current issues both spatially and in terms of themes, and to identify a land use planning</p>	

vision for the future. The objectives policy responses and outcomes flow from this.	
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?	
<p>NPA Response: Yes the format, through colour coding strategic policies and non-strategic policies provides clarity. Please see paragraph 4.9 Exam06 Local Development Plan with Focussed Changes and PPW edits. There is one overarching policy in relation to national park purposes. In terms of cross referencing in policies the aim has been to direct the reader from strategic policies to non-strategic policies where needed. Generic cross referencing to standard development management policies has been avoided with only specific development management issues for that form of development highlighted in the reasoned justification where necessary. Footnotes cover cross references to national planning policy, legislation or highlighting where more information can be found.</p> <p>This format approach is consistent with Local Development Plan 1 (NPA074) and Local Development Plan 2 will most likely have almost the same readership.</p>	
<i>Vision, Objectives and Strategy</i>	MD
3. Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2031?	
<p>NPA Response: Yes. The need to review the Vision was considered against the backdrop of the Review Report NPA002 and any consequential edits required. The strategy of the Plan remained substantially intact with issues regarding housing land supply and allocations being the primary driver for review. The vision is shared with the Management Plan 2015 to 2019 which is the overarching document for the Plan area. The vision was also considered against new strategic strategies – NPA070. The emerging replacement Management Plan (Consultation Draft approved at the National Park Authority Meeting of 6th June 2019) cross refers to Local Development Plan 2.</p>	
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?	
<p>NPA Response: Yes. Please see previous response and paragraph 23 of the Vision and Objectives Background Paper (NPA070).</p>	
4. Are the Plan's objectives SMART and capable of delivering on the identified Vision?	
<p>NPA Response: Yes. (See response to Q5d) below.</p>	

a) Were they reviewed as part of the replacement plan making process?	
NPA Response: Yes. Please see Vision & Objectives Background Paper NPA070 paragraph 20 for further advice.	
b) Should Objective E be amended to make reference to the need to sustain local communities?	
NPA Response: Please see NPA19 response to representation 2708/13.	
5. Does the Plan's Strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?	
NPA Response: Various policy options have been considered for the Plan's preparation when first prepared as LDP1. No fundamental issues arose except with the delivery of housing and the approach to providing housing in the countryside which this Plan has sought to address. The Alternative Options and Appraisal Background Paper provides more detail on the spatial, strategy and policy options considered – NPA057 . The Review Report also describes the main issues arising that needed to be addressed through Plan review – NPA002 .	
a) Should the Plan include a Key Diagram?	
NPA Response: Please see NPA23 (Focussed Changes Consultation Response) NPA response to 1569/FC01.	
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?	
NPA Response: Please see response to Q3. The Review Report also sets out how the evidence on which the Plan is based required updating or where further evidence was also needed – Chapter E. Chapter F also advises regarding contextual changes to address. The Plan was subject to a full review so all elements of evidence were considered for their robustness going forward for LDP2 preparation.	
c) What are the key components of the Strategy and how do they interact?	
NPA Response: Paragraph 4.1 to 4.10 of Exam 06 - Local Development Plan with Focussed Changes and PPW edits - explains the approach to drafting the Plan and the identification of strategy policies. They key components are contained in the Strategy Policies. Paragraph 4.5 refers to taking more of a rural strategy approach to drafting the Plan given its rural context. Exam06 Ensuring policies are directed at achieving objectives of	

<p>the Plan has been the starting point. The policies of the Plan were also appraised for compatibility against the sustainability appraisal objectives and amendments made to improve performance. This also helps to ensure consistency. The Plan's strategy remains mostly intact from its last iteration and no fundamental issues of conflict arose.</p> <p>There will inevitably be policies in the Plan that have the potential to conflict depending on how they interact. The Plan needs to be read as whole – see paragraph 1.5 Exam06 - Local Development Plan with Focussed Changes and PPW edits. However, given the statutory purposes of the National Park then all proposals would need to be consistent with the overall strategy policy, Policy 1 'National Park Purposes and Duty' . These purposes are underpinned by the Sandford Principle which asserts primacy of the first purpose over the second in cases of obvious conflict. Any potential for inconsistency when individual proposals are being considered would therefore be overcome.</p>	
<p>d) Will the Strategy deliver the Vision and Objectives?</p>	
<p>NPA Response: The strategy manifests itself through the application of various policies of the Plan. Each of the objectives is a product of seeking to address issues identified in the Plan and the Vision for the future. The objectives cross refer to relevant policies and specific outcomes are also identified. These outcomes are reflected in the monitoring indicators for the Plan in Chapter 5.</p>	
<p>e) How have the spatial and growth elements of the Strategy been derived, and should they be expressed in specific strategy policies?</p>	
<p>NPA Response: The Spatial Strategy derivation is summarised in paragraphs 4.14 to 4.24 of the Local Development Plan (NPA Exam 06) and is expressed in Strategy Policies 2 to 7. There are also strategy policies for Scale and Location of Growth, Visitor Economy, Housing, Affordable Housing, Employment and Retail.</p>	
<p>f) Does the Strategy represent a sustainable approach to planning over the plan period, and does it effectively link transportation, employment and residential growth?</p>	
<p>NPA Response: The outcomes of the Plan's strategy performance in relation to the sustainability objectives are summarised in Alternative Options and Appraisal Background Paper – NPA057. Paragraph 4.10 of Exam06 (LDP with Focussed Changes & PPW edits) provides an explanation.</p>	
<p>g) Has the Strategy been informed by the findings of the local housing market assessments?</p>	

<p>NPA Response: Yes. Please see Priority E Affordable Housing and Housing paragraphs 4.255 to 4.257 in particular – NPA Exam 06.</p>																																				
<p>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?</p>																																				
<p>NPA Response: The strategy of the current Local Development Plan (NPA074) has been largely transposed into Local Development Plan 2. Delivery on brownfield sites has been above targets historically – see table below- and the Authority anticipates this will continue under a similar policy framework.</p> <p>AMR LDP1 Performance Indicator 14 - Percentage of new development permitted on previously developed land</p> <table border="1" data-bbox="240 779 1093 1234"> <thead> <tr> <th>Year</th> <th></th> <th>Target for Brownfield %</th> <th>Greenfield %</th> <th>Brownfield %</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>Housing</td> <td>33</td> <td>17.8</td> <td>82.2</td> </tr> <tr> <td>2015/16</td> <td>Employment</td> <td>45</td> <td>38</td> <td>62</td> </tr> <tr> <td>2016/17</td> <td>Housing</td> <td>33</td> <td>15</td> <td>85</td> </tr> <tr> <td>2016/17</td> <td>Employment</td> <td>45</td> <td>23</td> <td>77</td> </tr> <tr> <td>2017/18</td> <td>Housing</td> <td>33</td> <td>21</td> <td>79</td> </tr> <tr> <td>2017/18</td> <td>Employment</td> <td>45</td> <td>39</td> <td>61</td> </tr> </tbody> </table> <p>In terms of seeking sites for allocation this has been explored over several Plans. Some opportunities have materialised but greenfield sites have also been required. Brownfield sites can continue to come forward as windfall contributions.</p>	Year		Target for Brownfield %	Greenfield %	Brownfield %	2015/16	Housing	33	17.8	82.2	2015/16	Employment	45	38	62	2016/17	Housing	33	15	85	2016/17	Employment	45	23	77	2017/18	Housing	33	21	79	2017/18	Employment	45	39	61	
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<p>i) Is the Strategy and policy framework consistent with national policy relating to Flood Risk?</p>	<p>SH</p>																																			
<p>NPA Response: Yes. Policy 35 of Exam06 – Local Development Plan with Focussed Changes and PPW edits - directs development away from areas of flooding from the sea or from rivers. The policy also takes climate change into account and information provided by the Shoreline Management Plans for the area – see NPA033. In addition policies 36, 37 and 38 of Exam06 provide additional controls in areas identified as being liable to increasing flood risk. None of the sites allocated for housing in the Plan are in flood risk areas.</p>																																				
<p>6. Is the Plan’s Strategy consistent/compatible with the following plans and strategies?</p>																																				

a) The Wales Spatial Plan and other national policy?	
b) Regional plans and strategies?	
c) The plans/strategies of neighbouring authorities? and	
d) Does the Plan reflect the strategies and proposals of infrastructure providers?	
<p>NPA Response: The various Background Papers and Statements of Common Ground sets out the national and regional context within which the Plan has been prepared. The Evidence Base Background Paper NPA062 provides an overall summary of the approach taken to considering the strategic context for the Plan.</p> <p>The Alternative Options and Appraisal Background Paper sets out how each policy of the Plan performs against the soundness tests – NPA057.</p> <p>With regard to the Wales Spatial Plan please see the Scale and Location of Growth Paper in particular paragraphs 36 to 56 – NPA036. The Council's Single Integrated Plan ran until 2018. Relevant Background Papers refer. Reference is also now made to the Wellbeing Plan for Pembrokeshire in Background Papers etc.</p> <p>In terms of neighbouring plans the Authority has sought to achieve compatibility with the adopted Local Development Plans of neighbouring planning authorities which were prepared under the Wales Spatial Plan. The authorities also liaise on the preparation of replacement plans and supporting research and guidance regionally. See also paragraphs 57 to 62 of NPA036.</p> <p>Please also see response to Q8 below.</p>	
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?	
<p>NPA Response: For Question 7 and 7a) please see the Scale and Location of Growth Background Paper NPA036 paragraphs 63 to 75 and Appendix 2.</p>	
b) Is the structure of the Settlement Hierarchy locally distinct?	
<p>NPA Response: Yes. The approach has been to highlight and address local distinctiveness within a wider regional and national context.</p> <p>The Scale and Location of Growth Background Paper NPA036 paragraphs 36 to 75 and Appendix 1 and 2.</p> <p>Please also see NPA057 Alternative Options &</p>	

Appraisal pages 8 to 26 for all the options considered for the settlement hierarchy.	
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 Catherine's Island?	MD/SH
<p>NPA Response: The policy framework has worked successfully under the first Local Development Plan (NPA074). The policy and supporting text has been edited to capture many of the comments received on earlier drafts. The policy works alongside other policies of the Plan.</p> <p>The Plan also has a specific policy on dealing with marinas – Policy 18 – see Exam06 Local Development Plan with Focussed Changes and PPW edits. It is not supported in principle in the National Park.</p> <p>The Welsh Government's policy approach to marinas is detailed in the Enjoyment Background Paper (NPA035) at paragraphs 15, 17 and Table 1. There are no proposals to support a marina in Tenby by Welsh Government.</p> <p>The rationale for not agreeing with a marina proposal at Tenby has been considered by the Authority through the candidate site process – see assessment for site number 005 Deposit Plan Candidate Site Register NPA020.</p> <p>In terms of St Catherine's Island, planning permission has been granted on two occasions (NP/15/0085 and NP/17/0006) for its use as a visitor centre although neither has been implemented to date. There is sufficient policy framework to deal with proposals coming forward.</p>	
d) Is Policy 3 clear and does it provide an appropriate framework for managing development in Newport?	
<p>NPA Response: Yes the policy is appropriate for the locality in terms of its status in the spatial hierarchy and the issues it seeks to address.</p> <p>The policy is the product of working a similar policy under Local Development Plan 1 (NPA074) and addressing issues emerging through the review of the Plan. The policy has not required fundamental review. It works well alongside other policies of the Plan.</p>	
e) Do the requirements of Policy 5 provide a clear and appropriate mechanism for managing development	

in St Davids Local Centre?	
<p>NPA Response: Yes the policy is appropriate for the locality in terms of its status in the spatial hierarchy and the issues it seeks to address.</p> <p>The policy is the product of working a similar policy under Local Development Plan 1 (NPA074) and addressing issues emerging through the review of the Plan. The policy has not required fundamental review. It works well alongside other policies of the Plan.</p>	
<p>f) 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?</p>	
<p>NPA Response: Yes the policy is appropriate for the locality in terms of its status in the spatial hierarch and the issues it seeks to address.</p> <p>The policy is the product of working a similar policy under Local Development Plan 1 and addressing issues emerging through the review of the Plan- see Table 4 Row 5 of the Review Report NPA002. The Authority would not have an issue with the first sentence of paragraph 4.46 being included in the policy wording. Possible Matters Arising Change</p>	
<p>g) Are the requirements of Policy 7 clear and does it provide an appropriate framework for managing development in the Countryside?</p>	
<p>NPA Response: The policy is the product of:</p> <ul style="list-style-type: none"> • Working a similar policy under Local Development Plan 1 (NPA074) and addressing issues emerging through the review of the Plan. • Ensuring that those limited opportunities for development in the countryside are included. <p>The policies work alongside other policies of the Plan.</p>	
<p>8. Is the approach to site selection sufficiently clear and transparent, and is it founded on a robust evidence base?</p>	SH
<p>a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?</p>	
<p>NPA Response: In response to Q8 and Q8c) the Authority prepared a Candidate Site Methodology Background Paper NPA029 and NPA030 which set out the questions to be completed by those submitting sites for consideration and how the Authority would undertake the assessment. Guidance notes were also produced to help with the completion of the forms. The Authority consulted with Town and Community Councils on all of the documents (April to June 2016) prior to the call for</p>	

Candidate Sites. The purpose of the consultation was to test the clarity, transparency and ease of use. All sites were assessed against a wide range of generic constraints with opportunity for unique circumstances to be taken into account, where necessary.	
b) Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?	
NPA Response: A further assessment of sites found to be suitable for development through the initial assessment were considered further, including all potential constraints through the Land Implementation Study, undertaken by Arcadis on behalf of the National Park Authority. See the Land Implementation Study (NPA052 to NPA056).	
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?	SB written statement provided
<p>Pembrokeshire County Council Written Response as the Sustainable Drainage Approval Body:</p> <p>The principle is to design sustainable drainage techniques into a development to deal with surface water flows created by that development at source from the outset of the development design. With good design it is anticipated that there will be no material impact on the capacity or deliverability of development sites as most techniques can be designed into a scheme if done so at the outset. With regard to viability, a number of studies have been carried out to consider cost/benefits of sustainable drainage systems, for example the Lamb Drove example in Cambridge¹ which has been assessed by CIRIA (Construction Industry Research and Information Association) who have quoted that the exercise, primarily based on evaluating the tangible costs and benefits, suggested around a 10% saving on capital costs with the sustainable drainage scheme when compared to standard methods. The study also suggested that the savings could have been greater if the sustainable drainage scheme layout had been considered earlier in the development process, hence the benefit of gaining a Sustainable Drainage Approval Body approval prior to commencement and in conjunction with the planning process.</p> <p>When considering design and capacity, Sustainable Drainage Schemes use a number of techniques to</p>	

¹ https://www.susdrain.org/case-studies/case_studies/lamb_drove_residential_suds_scheme_cambourne.html

manage runoff as it flows through the management train sequence within the development. Firstly a number of techniques may be used within a private property boundary that will contribute to the management of rainfall on the development. They include green roofs, soakaways, permeable driveways, domestic rain gardens, water butts and rain harvesting systems. Subject to careful design and appropriate ground conditions, these techniques can be implemented within the footprint of a plot and need not impact on floor/plot area or property numbers.

Source Control Sustainable Drainage Schemes are usually associated with the street landscape or similar areas within development and include filter strips, swales, filter drains, permeable pavement and small detention basins. These techniques can be incorporated within the area occupied by the road, with swales for example being placed in the road verge and the wearing course of the road being made permeable as with permeable block paving.

Once runoff has passed through initial source control features it can flow to a site control such as a detention basin, pond or wetland often located in green space within or just outside the development boundary. As with the source control, these techniques can be incorporated within existing features, for example a LEAP (Local Equipped Area for Play) /LAP (Local Area for Play) can be designed as a detention basin.

As can be seen from the above information, a suitable SUDS scheme can be designed in to a development proposal with no material impact on capacity and as such should not have an impact on allocation delivery figures. Furthermore the techniques can be incorporated within traditional features and layouts so should not have an impact on deliverability. Finally, evidence is available indicating that the cost of installation of Sustainable Drainage Schemes has the potential of being lower than standard positive drainage techniques so should not impact on viability.

In conclusion the Sustainable Drainage Approval Body does not anticipate that the implementation of Schedule 3 of the Flood and Water Management Act 2010 will have an impact on the capacity, deliverability or viability of the proposed allocation sites.

Stephen Bengier
Engineering Development Management
Pembrokeshire County Council

11. Will the Plan be supported by Supplementary Planning Guidance?	MD
National Park Authority response: Yes. A list of proposed guidance can be found in Appendix 1. References are also made within the Plan.	

Appendix 1 LDP 2 Supplementary Planning Guidance

	Title	Current Status LDP1
1.	Accessibility Supplementary Planning Guidance	Adopted June 2013
2.	Affordable Housing Supplementary Planning Guidance	5th November 2014 Technical Update August 2015
3.	Archaeology Supplementary Planning Guidance	Adopted June 2011
4.	Biodiversity	New
5.	Caravan, Camping and Chalet	New
6.	Coal Works – Instability	Adopted June 2011 Technical update May 2014
7.	Conservation Areas	October 2011
8.	Landscape	Adopted June 2011
9.	Lighting	New
10	Loss of Community Facilities	New
11	Loss of Hotels	Adopted June 2011
12	Low Impact Development /One Planet Development	Adopted June 2013
13	Parking	Adopted June 2011
14	Planning Obligations	Adopted September 2016
15	Recreation	Adopted December 2012
16	Regionally Important Geodiversity Sites	Adopted October 2011 Addendum Adopted September 2016
17	Renewable Energy Supplementary Planning Guidance	Adopted October 2011 Adopted June 2012 Technical update April 2014
18	Safeguarding Mineral Zones	Adopted June 2011 Technical update June 2014
19	Seascape Character	Adopted December 2013
20	Shopfront Design	Adopted October 2011
21	Siting and Design of Farm Buildings & Slurry Lagoons	Adopted June 2012
22	Sustainable Design	Adopted June 2011 (updated December 2013)
23	The Cumulative Impact of Wind Turbines	Adopted December 2013

Session 1 – Plan Preparation and Strategy

Representor	Change sought	Why NPA do not think this is a sound approach
Pembrokeshire County Council 2708/07	Inclusion of Candidate Site No. 112 Brynhir Tenby	See Authority Response pages 99 to 103. Consultation Report NPA17 Test 3 Deliverability issues.
2708/13	See representation in NPA19 . Deposit Representations and Authority Response	See across. Test 2 in terms of the appropriateness of the amendment suggested for the locality.
Marloes & St Brides Community Council 2897/4	See representation in NPA19 . Deposit Representations and Authority Response	See across. Test 1 in terms of compliance with national planning policy and guidance would be the issue of concern for the Authority.
2897/15	See representation in NPA19 . Deposit Representations and Authority Response	See across. Test 1 in terms of compliance with national planning policy and guidance would be the issue of concern for the Authority regarding reducing densities.
2897/19	See representation in NPA19 . Deposit Representations and Authority Response	See across. Test 1 in terms of complying with national planning policy requirements.
2897/31	See representation in NPA19 . Deposit Representations and Authority Response	See across.

Representor	Change sought	Why NPA do not think this is a sound approach
2897/32	See representation in NPA19. Deposit Representations and Authority Response	See across.
2897/33	See representation in NPA19. Deposit Representations and Authority Response	See across. No replacement wording is provided.
2897/35	See representation in NPA19. Deposit Representations and Authority Response	See across.
2897/37	See representation in NPA19. Deposit Representations and Authority Response	See across
St Davids City Council 2910/12	A comment not asking for a change.	See across
2910/24	See representation in NPA19. Deposit Representations and Authority Response	Test 2 in terms of clarity and focus are the issues of concern.
2910/25	See representation in NPA19. Deposit Representations and Authority Response	Test 3 regarding deliverability of sites as suggested. Test 2 regarding the appropriateness of a particular solution for traffic management is an issue for the Authority.
2910/26	See representation in NPA19. Deposit Representations and Authority Response	Test 2 in terms of clarity and focus are the issues of concern.
2910/27	See representation in NPA19. Deposit Representations and Authority Response	See across.

Representor	Change sought	Why NPA do not think this is a sound approach
2910/28	See representation in NPA19 . Deposit Representations and Authority Response	See across.
3582 Barnett		
NAEG (S Bayes) 3778/23	See representation in NPA 17 Consultation Report. Representation and Authority response.	See across. Test 1, Test 2, and Test 3 are of concern.
Mr Fry 4217/22	Tenby needs a catalyst, St Catherine's Island enhancement and the inclusion of a marina.	<p>Soundness Test 1 – inclusion of the proposal would make the Plan inconsistent with national and local plans and strategies.</p> <p>Soundness Test 2 - there is a lack of evidence to support the provision of a marina and its development in this location; and</p> <p>Soundness Test 3 – There is no evidence of need or funding to deliver a marina at Tenby.</p>