

# **Pembrokeshire Coast National Park**

## **Local Development Plan (2015-2031)**

### Session 2

### Special Qualities of the National Park

### Hearing Statement

**Wednesday 3<sup>rd</sup> July 2019 9.30am**

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

- Alternative Options & Appraisal BP NPA057
- Special Qualities BP NPA069
- Green Wedge BP NPA063 & NPA064
- RIGs SPG

June 2019

**PEMBROKESHIRE COAST NATIONAL PARK  
AUTHORITY**

<b>Session/Matter 2 – Special Qualities of the National Park Wednesday 3<sup>rd</sup> July 2019 9.30am</b>	
<i>Issue: Does the Plan provide a framework for the management of the Special Qualities of the National Park that is soundly based, justified and consistent with the requirements of national policy?</i>	MD
<b>Special Qualities of the National Park</b>	
1. Does Policy 8 provide adequate protection for the Special Qualities of the National Park, and is it founded on robust evidence?	
a) Is the policy consistent with the requirements of other legislation and national planning policy?	
NPA Response: Please see the assessment of Policy 8 on page 28 of the Alternative Options & Appraisal Background Paper NPA057 and the Background Paper Special Qualities NPA069.	
b) Are the requirements of Policy 8(e) clear and does it provide an appropriate framework for managing the impact of development on the National Park's ecosystems?	
NPA Response: The requirements of Policy 8e) along with the suite of policies that are cross referenced provide an appropriate framework for decision making alongside national planning policy – Exam06 – Local Development Plan 2 with Focussed Changes and PPW10 edits.	
2. Is the framework for assessing and managing the impact of light pollution contained in Policy 9 clear and consistent with national policy?	
NPA Response: Please see the assessment of Policy 9 on page 28 and 29 of the alternative Options & Appraisal Background Paper NPA057.	
<b>Nature Conservation</b>	MD
3. Does the Plan provide an appropriate level of protection for statutory and non-statutory sites of biodiversity, nature conservation and geological importance?	
a) Are Policies 10, 11, 12 and 13 consistent with the requirements of national planning policy and other legislation?	
b) Does Policy 12 provide an appropriate policy framework for assessing and managing the impact of development proposals on Local Sites of Nature Conservation or Geological Importance, are the designations contained in the policy identified in the Plan and annotated on the Proposals Map?	
c) Does Policy 13 provide an appropriate policy framework for assessing and managing the impact of development proposals on biodiversity?	
NPA Response: With regard to questions 3a) to c) please see the assessment of Policies 10 to 13 on pages 29 to 30	

<p>of the Alternative Options &amp; Appraisal Background Paper <b>NPA057</b>.</p> <p>The mapping of known nature conservation sites under Policy 12 is shown on the Constraints Map as they are designated by mechanisms outside the Local Development Plan.</p> <p>Regionally Important Geodiversity Sites are funded and supported by Natural Resources Wales. They are designated outside the Local Development Plan process by Geoconservation Cymru – Wales. The Authority supports these designations with supplementary planning guidance which is updated when sites are newly designated. They are therefore not shown on the Proposals Map but could be shown on the Constraints Map.</p> <p>With regard to other areas of biodiversity interest locally that are not mapped please see edits suggested in <b>Exam05</b> (the implications of Planning Policy Wales Edition 10) – see page 15 ‘Biodiversity’ and <b>Exam 06</b> Local Development text edits for Focussed Changes and PPW10) – Policy 12 and the reasoned justification.</p>	
<p><b>Welsh Language</b></p>	<p>SH</p>
<p>4. Does the Plan’s strategy adequately safeguard the interests of the Welsh language?</p>	
<p>a) How have the settlements identified in paragraph 4.80 been defined, and should they be included in Policy 14?</p>	
<p>NPA Response: The list of areas included in paragraph 4.80 of the Plan relate to Town and Community Council areas and would include the whole of the land within those identified areas. The list includes all town and community council areas which have at least 19.2% of residents as Welsh speakers, based on 2011 Census data. This is the proportion of Welsh speakers in Pembrokeshire as a whole. The list corresponds with the Welsh language sensitive area defined on the Proposals Map. The written list is intended to provide clarity and does not expand the policy nor does it contain any additional information which would be used for taking decisions than is already contained in the policy. The Authority considers therefore that the list is correctly included in the supporting text to the policy. However, Welsh Government has suggested that the list be included within Policy 14 and the Authority has no objection to doing so if this meets the concern as set out in the response to Focussed Change 1569/FC03– <b>NPA023</b>.</p>	
<p>b) To what scale of development do the requirements of Policy 14 apply?</p>	
<p>NPA Response: Paragraph 4.83 of <b>Exam06</b> (Local Development Plan with Focussed Changes and PPW10 edits) sets out that the policy will be used in determining</p>	

<p>'large scale development on windfall sites' and that 'large scale' is major development as in the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.</p>	
<p>c) What type of mitigation measures are appropriate in the National Park?</p>	
<p>NPA Response: Paragraph 4.85 Exam06 (LDP2 with Focussed Changes and PPW10 track changes) refers to phasing of development as a land use planning mitigation method to protect Welsh language interests and this would be appropriate in the National Park, if required.</p>	
<p><b>Heritage</b></p>	<p>GL</p>
<p>5. Is Policy 15 clear and consistent with the requirements of The Historic Environment (Wales) Act 2016?</p>	
<p>NPA Response: Para 4.87 of the Exam06 (LDP2 with Focussed Changes and PPW10 track changes) refers to Planning Policy Wales Edition 10 Chapter 6 relating to the Historic Environment, including the protection of historic assets of special local importance which do not have statutory protection but that make an important contribution to local distinctiveness and have the potential to contribute to public knowledge. Policy 15 has been in operation since Local Development Plan 1 (NPA074) was adopted in 2010 (and before) and no issues have arisen from its implementation through the Annual Monitoring Reports (NPA077-084).</p> <p>Please also see the Authority's response to representation 3511/54 in the Deposit Plan Responses Table- NPA019</p>	
<p><b>Landscape, Public open Space and Green Wedges</b></p>	
<p>6. Does Policy 16 provide an appropriate policy framework for assessing and managing the impact of development proposals on the landscape and seascape?</p>	<p>GL</p>
<p>NPA Response: Please see the assessment of Policy 16 on page 32 of the Alternative Options &amp; Appraisal Background Paper NPA057.</p> <p>Policy 16 (and associated SPGs for the landscape and seascape character areas) has been in operation since Local Development Plan 1 (NPA074) was adopted in 2010 and no issues have arisen from its implementation through the Annual Monitoring Reports (NPA077-084).</p>	
<p>7. Should Policy 17 be deleted and replaced with separate policies for the protection and provision of public open space and the designation of Green Wedges?</p>	<p>SH</p>
<p>NPA Response: The policy is included in the Plan to match the mapping of the identified areas on the Proposals Map.</p> <p>The policy approach is taken directly from Planning Policy Wales (as referred to in paragraph 4.101 of the Plan</p>	

<p><b>Exam06</b>). In this respect it is considered appropriate to refer to the two means of protecting areas from inappropriate development in the one policy. Creating two policies would add nothing more.</p>	
<p>a) Is the designation of 43 no. Green Wedges justified, supported by robust evidence and have they been reviewed as part of the replacement plan making process?</p>	<p>SH</p>
<p>NPA Response: The objection from Welsh Government appears to be made in relation to the number of green wedge designations, rather than any specific areas being considered inappropriately designated. Several types of development are permitted outside Centre boundaries, including employment uses and exceptional land releases for affordable housing, the Green Wedge designation has been applied in locations where there is additional need to conserve the National Park landscape. All of the Green Wedges have been reassessed as part of the Plan Revision process. Please see the Consultation Report Main Issues for the Authority's response to this objection <b>NPA17</b>, page 107 and the Green Wedge Background Paper (March 2018). (<b>NPA063 &amp; 64</b>)</p>	
<p>b) Does the Plan provide an appropriate mechanism for protecting existing, and securing the provision of new, public open space?</p>	<p>MD</p>
<p>NPA Response: The approach taken in the Plan <b>Exam06</b> – Local Development Plan 2 with Focussed Changes and PPW10 edits (Policy 17 and 53) has not caused any issues through implementing a similar approach in the current Local Development Plan.</p>	
<p>c) Are the boundaries of the public open spaces annotated on the inset maps C41 and C42 – Tenby correct?</p>	<p>GL</p>
<p>NPA Response: Deposit Rep 3511/67 requested the inclusion of several sites in Tenby. Please see <b>NPA021</b> – New and Amended Sites for included/excluded sites. Please also see response to the Focussed Changes Representation 3511/FC20 <b>NPA023</b></p>	
<p>8. Does Policy 19 provide an appropriate mechanism for managing development within Porthgain, Saundersfoot, Solva and Tenby Harbours, and should it make reference to other smaller harbours in the National Park?</p>	<p>SH</p>
<p>NPA Response: Policy 19 of <b>Exam06</b> – (Local Development Plan 2 with Focussed Changes and PPW10 edits) is included to ensure that the business and other uses within the listed harbours can continue to support the viability of the harbours, particularly as public places with direct access to the sea. Please see the Authority's response to representation 2910/62 in the Deposit Plan Responses Table. (<b>NPA019</b>).</p>	

## Session 2 - Special Qualities of the National Park

Representor	Change sought	Why NPA do not think this is a sound approach
Marloes & St Brides CC 2897/45	See <b>NPA19</b> Deposit Representation and Authority Response.	Test 2 regarding the appropriateness of the change given the local evidence.
2897/48	See <b>NPA19</b> Deposit Representation and Authority Response.	Test 2 in terms of clarity and focus is of relevance.
2897/56	See <b>NPA19</b> Deposit Representation and Authority Response.	See across.
2897/58	See <b>NPA19</b> Deposit Representation and Authority Response.	See across.
St Davids City Council 2910/41	See <b>NPA19</b> Deposit Representation and Authority Response.	No specific Test applicable.
2910/62	See <b>NPA19</b> Deposit Representation and Authority Response.	Test 2 in terms of clarity and focus is of relevance.
2910/64	See <b>NPA19</b> Deposit Representation and Authority Response.	The intention behind the change sought is unclear to comment further.
2910/65	See <b>NPA19</b> Deposit Representation and Authority Response.	No specific Test applicable.
2910/66	See <b>NPA19</b> Deposit Representation and Authority Response.	No specific Test applicable.
Tenby Civic Society	See <b>NPA19</b> Deposit Representation and Authority	No specific Test applicable. A change is

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3511/54	Response.	proposed in response.
3511/67	See <b>NPA19</b> Deposit Representation and Authority Response.	A change is proposed in response to part of the submission.
3511/FC20	See <b>NPA23</b> Focused Change Representation and Authority response.	A change is proposed in response to part of the submission.