

# Pembrokeshire Coast National Park

## Local Development Plan (2015-2031)

### Session 3

### Major Development, the Potential for Growth

### Hearing Statement

Wednesday July 3<sup>rd</sup> 2019 2pm

Martina Dunne, Gayle Lister

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

June 2019

**PEMBROKESHIRE COAST NATIONAL PARK  
AUTHORITY**

<b>Session/Matter 3 – Major Development, the Potential for Growth Wednesday 3<sup>rd</sup> July 2pm</b>	
<i>Issue: Does the Plan provide a framework for the management of major development in the National Park that is soundly based, justified and consistent with the requirements of national policy?</i>	MD
<b>Major Development</b>	
1. Is the explanation of Major Development in paragraph 4.117 sufficiently clear?	
NPA Response: Please see response to Representation 3457/71, page 14 of NPA019 (Deposit Representations and the Authority's response).	
2. Should Policy 21 be relocated to the National Park Purposes and Spatial Strategy Chapter?	
<p>NPA Response: The format of Local Development Plan 2 is a product of comment received in the preparation of Local Development Plan 1. There were two schools of thought for the last Inspector to consider in terms of how Local Development Plan 1 was presented:</p> <ul style="list-style-type: none"> <li>- Providing a more standard local planning approach to presentation putting emphasis on levels and location of growth in the first part of the Plan (NPA074) – see Appendix 1 which shows the Deposit Local Development Plan 1 contents page.</li> <li>- Recognising the uniqueness of the Pembrokeshire Coast National Park, it is logical to start with policies of major focus, i.e., national park purposes and special qualities should be the primary consideration. This sets the context. The Authority is constantly required to challenge the assumption that we are similar to other local planning authorities. The added complication is that the National Park covers a relatively thin strip of Pembrokeshire together with the upland ridge of the Preselis, and it lies in very close juxtaposition with neighbouring local planning authority Pembrokeshire County Council. This can mean that planning decisions taken in the Park may seem to some to be 'unfair' or inconsistent with those taken within the neighbouring County Council which is often just a few metres away, sometimes within the same community. Whilst this may occur in other National Parks, it is likely to occur far more often within the Pembrokeshire Coast National Park because of this unique shape and location. It is all the more important, therefore to raise the profile of the purposes of the National Park.</li> </ul> <p>The conclusion was to present the Plan in the format shown in Local Development Plan 2 which reflects the emphasis on National Park purposes.</p>	
<b>Minerals</b>	GL
3. How will the demand for minerals, in terms of hard rock and sand and	

gravel, be met over the Plan period, and does this approach accord with national policy?	
<p>NPA Response: Paragraph 4.133 of Exam06 (Local Development Plan 2 with Focussed Changes and PPW10 edits) states that the National Park currently contributes to aggregate mineral extraction in relation to sand and gravel quarries and hard rock. National Policy states that minerals development should not take place in National Parks save in exceptional circumstances.</p> <p>Table 5.1 of the Regional Technical Statement (also replicated in the Minerals Background Paper (NPA065) shows the apportionments for future aggregates provisions where the Pembrokeshire Coast National Park is combined with Pembrokeshire County Council, Ceredigion and Carmarthen for sand and gravel and with Pembrokeshire County Council for crushed rock. Where apportionments are shown for a National Park, these relate to production from existing permitted reserves in those areas. There is no requirement for a National Park to provide future allocations or to maintain landbanks as stated in national policy (Minerals Planning Policy Wales, MTAN 1 (NAT22): Aggregates and PPW 10(NAT02).</p> <p>A Statement of Common Ground has been issued on behalf of Pembrokeshire Coast National Park Authority, Pembrokeshire County Council, Ceredigion County Council and Carmarthenshire County Council (NPA025) to address the collective shortfall in land based sand and gravel provision identified within the Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties 1<sup>st</sup> Review (REG05).</p>	
4. Does the Plan adequately safeguard mineral resources?	
<p>NPA Response: Policy 22 – Exam06) - Local Development Plan 2 with Focussed Changes and PPW10 edits reflects national planning policy which requires the safeguarding of certain key mineral resources.</p> <p>Areas to be safeguarded are identified on the Proposals Map in 2 categories comprising a ‘Sand and Gravel’ category and a ‘Hard Rock’ category (merging all Limestone, sandstone, Igneous Rock and Slate safeguarding zones together). Please see Minerals Background Paper (NPA065) for explanation.</p>	
5. Does the Plan provide adequate buffer zones around mineral reserves?	
<p>NPA Response: Policy 23 (Exam06) - Local Development Plan 2 with Focussed Changes and PPW10 edits) reflects national planning policy which requires buffer zones around mineral reserves. Buffer zones are identified on the Proposals Map showing distances of 100 metres for sand and gravel extraction sites and 200 metres for hard rock. Please see Minerals Background Paper (NPA065) for explanation.</p>	
<b>Waste</b>	<b>GL</b>

6. Is the Plan's waste strategy consistent with national policy?	
<p>NPA Response: Para 4.151 of the Exam06 (LDP2 with Focussed Changes and PPW10 track changes) refers to TAN 21 NAT021: Waste para 1.7 which states that National Park authorities do not have responsibilities in relation to waste collection and disposal. National Park authorities act as local planning authorities within the boundaries of their national park and as such are expected to collaborate in planning for waste facilities. Para 8.2-8.3 TAN 21 states waste site developments are not precluded from National Parks provided they are appropriately designed. Please see Waste Background Paper (NPA071) for further explanation.</p>	
7. Are the requirements of Policy 29 (e) and (f) clear?	
<p>NPA Response: TAN 21:Waste (NAT21) para 11.1 states that potential effects on water resources are a material planning consideration and that there should be no possibility of run-off, spillage or leachate pollution of surface or groundwaters. Para 5.13.1 on page 102 of PPW 10 (NAT02) also states that sustainable waste management facilities should minimise adverse environmental impacts and avoid risks to human health.</p> <p>Para 4.156 of the Exam06 (LDP2 with Focussed Changes and PPW10 track changes) states that NRW will be consulted on any proposals for composting.</p> <p>Para 4.154 of the Exam06 (LDP2 with Focussed Changes and PPW10 track changes) states that any product produced by composting must be of a quality good enough for beneficial after-use (and therefore has added value). Please also see para 4.44 in TAN 21 (NAT 21).</p>	GL

## Appendix 1 Extract from Local Development Plan 1 Deposit Version

<b>4. HOW WE GET THERE – LOCAL DEVELOPMENT PLAN STRATEGY AND POLICIES</b>	<b>18</b>
<b>Translating the vision and objectives into a Local Development Plan strategy and policies</b>	<b>18</b>
<b>Spatial Strategy</b>	<b>22</b>
Location of growth	22
Tenby – Local Service and Tourism Centre	23
Newport – Local Centre	24
Saundersfoot – Local Centre	25
St Davids – Local Centre	26
Crymych – Local Centre	27
Rural Centres	27
Countryside	28
Key Actions outside the Local Development Plan	30
PEMBROKESHIRE COAST NATIONAL PARK LOCAL DEVELOPMENT PLAN (DEPOSIT)	
	<b>2</b>
<b>A. National Park purposes, major development, the potential for growth</b>	<b>34</b>
National Park purposes and duty	34
Major development	34
Ministry of Defence	35
Hazardous Installations	35
Scale of growth	35
Minerals	37
Waste	40
<b>B. Climate change, sustainable design, flooding, sustainable energy</b>	<b>44</b>
Sustainable Design	44
Renewable Energy	48
Flooding & Coastal Inundation	49
Key Actions outside the Local Development Plan	49
<b>C. Visitor economy, employment</b>	<b>52</b>
Visitor accommodation, attractions, leisure activities and recreation	52
Employment	57
Key Actions outside the Local Development Plan	60
<b>D. Affordable housing and Housing provision</b>	<b>62</b>
Gypsy Sites	69
Low Impact Development Making a Positive Contribution	70
Key Actions outside the Local Development Plan	70
<b>E. Community Facilities, Retailing, Transport</b>	<b>72</b>
Community Facilities	72
Retail	73
Sustainable transport	75
Utility Services	78
Key Actions outside the Local Development Plan	79
<b>F. Special Qualities of the National Park</b>	<b>82</b>
Light Pollution	84
Biodiversity	84
Welsh Language	85
Historic Environment	86
Landscape	87
Open Space & Green Wedges	88
Coast	88

### Session 3 – Major Development, the Potential for Growth

Representor	Change sought	Why NPA do not think this is a sound approach
2897/69 Marloes & St Brides Community Council	See <b>NPA19</b> Deposit Representation and Authority Response.	See across.