

Pembrokeshire Coast National Park

Local Development Plan (2015-2031)

Session 5

Visitor Economy, Employment, and Community Facilities

Hearing Statement

Thursday 4th July 2019 2pm

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

June 2019

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY**

Session/Matter 5 – Visitor Economy, Employment, Community Facilities, Retail and Transportation Thursday 4th July 2pm	
<i>Issue: Are the Plan's requirements for visitor economy, employment, community facilities, retail and sustainable transport supported by robust and credible evidence and consistent with national policy?</i>	SH
Economy	
1. What is the Plan's overarching strategy for the economy of the National Park, and is it supported by robust evidence?	
<p>NPA Response: The Plan's strategy for the economy of the National Park is set out in paragraph 4.239 of Local Development Plan with Focussed Changes and PPW10 edits (Exam06).</p> <p>It allows for small-scale provision (up to 2 hectares) of employment premises. Larger scale premises are not considered appropriate in the National Park and will be provided in Pembrokeshire County Council's planning area. The Employment Background Paper (NPA061) details the land use planning requirements for employment premises in Pembrokeshire, including the National Park. In particular paragraphs 86 to 89 sets out how the Local Development Plan can contribute to meeting that need.</p> <p>Tourism and the visitor economy is a large element of the economy of Pembrokeshire and the outstanding natural environment of the National Park is a major part of the attraction. The Plan's strategy in this regard is set out in paragraph 4.203 of the Local Development Plan with Focussed Changes and PPW10 edits (Exam06) and is intended to strike a balance between the need to protect the environment within which operates a thriving and adaptable visitor economy. The evidence base is set out in the Enjoyment Background Paper (NPA035).</p>	
Visitor Economy	
2. Does the Plan, through Policy 39 provide an appropriate framework for the consideration of proposals for new or enhanced tourism accommodation, facilities and attractions?	
<p>NPA Response: Yes. The requirements of Policy 39 along with the suite of policies that are cross referenced provide a suitable framework for decision making alongside national planning policy (Exam06; NAT02).</p>	
3. Does Policy 40 provide an appropriate framework to manage the alternative uses for all existing tourism development?	
<p>NPA Response: Policy 40 is intended for use in considering</p>	

<p>applications changing the use from serviced visitor accommodation (hotels and guesthouses). Serviced accommodation in the National Park has been particularly vulnerable to conversion to more lucrative residential uses with the loss of a large number of hotels and guesthouses since the 1980s. The introduction of this policy approach in Local Development Plan 1 (NPA074) has provided a means of reducing the loss of this type of accommodation. Hotels and guest houses often form part of the appeal and character of a town, village or area, which helps to attract visitors. In some instances, such as the Esplanade in Tenby, they form an intrinsic element of the identity of a particular frontage. Larger hotels also often form important landmarks in the townscape or landscape. They also bring income and employment to the area. These are the reasons for singling out serviced accommodation rather than all existing tourism development. It has been an effective policy approach and is considered appropriate in terms of its scope and outcome.</p>	
<p>4. Why do Policies 39(d) and 41 seek to prevent the construction of new self-catering accommodation on greenfield sites, and is this approach supported by robust evidence?</p>	
<p>NPA Response: Paragraph 4.216 of Local Development Plan with Focussed Changes and PPW10 edits (Exam06) details the need to prioritise delivery of affordable housing over self-catering accommodation.</p> <p>The Enjoyment Background Paper (NPA035) (paragraphs 82 to 87) sets out the evidence to show that a significant proportion of the housing stock within the National Park is used for holiday letting or second homes. The occupancy figures also detailed in the Enjoyment Background Paper show that demand for this type of accommodation is easily met. With such a significant demand for affordable housing provision, this approach allows for the ongoing development of some visitor accommodation in Centres and through conversions in the countryside whilst making the most of opportunities to maximise delivery of affordable housing. The Sustainability Appraisal Report March 2018 Appendix B: Detailed Options Appraisal shows the approach to maximise the potential to deliver what is needed to sustain communities and make improvements to the environment. (NPA010).</p>	
<p>5. Are the requirements of Policies 42 and 43 clear and consistent with national policy?</p>	
<p>NPA Response: The requirements of Policies 42 and 43 along with other policies that are cross referenced provide a suitable framework for decision making alongside national planning policy (Exam06/NAT02).</p>	
<p>Employment</p>	
<p>6. Is the Plan's employment strategy founded on a robust evidence base and is it consistent with national Policy?</p>	
<p>a) What are the key drivers for change in National Park's employment market? and how has the Plan addressed these considerations?</p>	
<p>NPA Response: Please refer to the Employment Background</p>	

<p>Paper (NPA061) and in particular paragraphs 62 to 72, 79 to 82 and 89. In brief the main drivers for change are listed below with the relevant Plan policies (NPA06) to help address them in brackets alongside. Proposals will also be considered in the context of Planning Policy Wales (NAT02) and the series of Technical Advice Notes (NAT03 to NAT25):</p> <ul style="list-style-type: none"> i. Provision of premises for inward investment (Policies 1, 2, 3, 4, 5, 6, 7, 18, 19, 21, 44, 45); ii. Improving mobile telephony (Policy 61); iii. Enhance tourism facilities (Policies 1, 2, 3, 4, 5, 6, 7, 39); iv. Allow for a range of tourism accommodation (Policies 40, 41, 42, 43); v. Allow for rural diversification (Policy 46); vi. Create new or improve existing facilities at harbours (including links between tourism and the fishing industry) (Policy 19); vii. Improve degraded areas (Policies 1, 2, 3, 4, 5, 6, 7, 19, 36, 37, 38); viii. Development of renewable energy (Policy 34). 	
<p>b) Should the Plan allocate land for employment related development?</p>	
<p>NPA Response: The employment allocations in Local Development Plan 1 (NPA074) have not been delivered and there has been no demand for employment land in the form of pre-application enquiries or even informal enquiries. As detailed in paragraphs 86 and 87 of the Employment Background Paper (NPA061) the demand in the National Park is for small business units, but public funding to provide such facilities has not been available for some time and there are no current proposals to do so. Tables 15 and 16 of the Review Report (NPA002) show the lack of delivery of employment and the employment and commercial elements of mixed use sites. Allocation of sites in the Plan would fail to meet Soundness Test 3.</p>	
<p>c) Does the Plan provide a clear framework for the development of rural enterprises?</p>	
<p>NPA Response: Yes. Rural enterprises can be wide ranging and the Plan policies (Local Development Plan with Focussed Changes and PPW10 edits Exam06) particularly policies 6, 7, 42, 44, 45, 46, 52 and 56, alongside national planning policy, provide a clear framework for the consideration of rural enterprise proposals.</p>	
<p>7. Does the Plan provide sufficient protection for existing employment land and property?</p>	
<p>a) Does the evidence base contain a robust quantitative and qualitative analysis of the existing employment land and property?</p>	
<p>NPA Response: Employment sites in the National Park are generally small or micro-scale and scattered. Mapping and quantitative analysis would be extremely difficult. A significant proportion of the local economy is also reliant on non B-Class uses – such as retail and tourism. The Employment Background Paper</p>	

(NPA061) provides details of the numbers of people employed in various employment sectors within the Park.	
b) Does Policy 45 provide an appropriate framework for the safeguarding of existing key employment sites?	
NPA Response: There are no key employment sites identified in the National Park. The National Park does not have large derelict brownfield sites to list as employment protection sites. The Plan does contain a policy which protects existing employment sites and buildings generally for that use. The approach in the Plan is to consider the re-use of these small sites where the criteria of the policy (Policy 45) is met.	
c) How will proposals for alternative uses be assessed?	
NPA Response: Policy 45 of Local Development Plan with Focussed Changes and PPW10 edits (Exam06) protects employment sites for other employment uses in the first instance but where loss of the land or premises can be justified, either through it being an inappropriate location for employment use, viability or lack of market interest, alternative uses would be considered. The priority in such instances would be the re-use of the land for community use or for affordable housing or a mix of market and affordable housing (depending on its location). In terms of a particular proposal coming forward, evidence would be required to demonstrate that other uses further up the hierarchy could not be achieved.	
Retail	GL
8. Is the Plan's retail strategy founded on robust evidence, and is it consistent with national Policy?	
<p>NPA Response: Para 4.317 of Exam06 (LDP2 with focussed changes and PPW10 track changes) refers to PPW Chapter 4 Retail Strategies which requires development plans to establish a hierarchy of retail and commercial centres, taking in to account the size, scale, form, function and location of the centres. Once the hierarchy is established, it will enable a set of policies which allow development to take place in appropriate centres and at appropriate scales.</p> <p>The Retail Background Paper (NPA066) supplies the rationale for the retail hierarchy. The SW Wales Regional Retail study (REG01) establishes the capacity for future retail growth during the Plan period (Section 9) and provides a robust evidence base.</p> <p>National Policy raises three main tests in relation to the sequential test, the need for development and impact on existing centres. The hierarchy identifies a centres first approach and will enable the impact of proposals to be fully considered. REG01 establishes whether there is a need.</p> <p>Please see the Alternative Options and Appraisal Background Paper (NPA057) for the rationale regarding Primary Frontages and Centre Boundaries which are in accordance with national policy.</p>	
a) Does the retail strategy take into account the envisaged growth in other sectors, particularly housing and the visitor economy?	
NPA Response: Population figures in the Regional Retail Study (REG01) are for the whole of the Pembrokeshire catchment including	

those areas under the jurisdiction of PCC planning area. Population figures derived from the Alternative Demographic Forecasts (NPA043) relate only to the National Park. Therefore the results are not directly comparable. In addition, the time frames of the 2 documents differ with the SW Wales Retail study covering the time period of 2016-2036 and the Alternative Demographic Forecasts covering the time period of 2015-2031.

The housing growth of 60 dwellings per annum relates to a population growth of 632 between 2015 and 2031 (Table 4 NPA043). The retail study has calculated a growth of 1884 between 2016 and 2036 using 2011-based population projections or a decrease of 694 using 2014-based population projections for the Pembrokeshire catchment areas.

The 2011-based population figures therefore better reflect the positive growth in housing proposed in the Local Development Plan.

It is suggested therefore that a Matters Arising Change would be appropriate to quote the 2011 population projection based figures. This would result in a change to the figures in para 4.311 of the Exam06 (LDP2 with focussed changes and PPW10 track changes).

Centre	4.311 figure	Matters Arising Change – figure
Tenby	515m ²	707m ²
St. Davids	293m ²	346m ²
Saundersfoot	¹ 109m ²	109m ²
Newport	89m ²	108m ²

The changes result in relatively small increases in each centre only towards the end of the Plan period. The need remains negative over the short term and small positive increases in the medium term for some centres. Para 10.45 of the Regional Retail Study (REG01) confirms that capacity studies beyond 5 years should be treated with caution.

No change to the Policy approach is needed as the criteria based policy provides the basis to consider planning applications coming forward.

Para 4.311 of Exam06 (LDP2 with focussed changes and PPW10 track changes) and the Regional Retail Study indicate that there is a small amount of capacity for comparison goods across the National Park's 4 main retail centres, likely to be occupied by tourist related retailers and be small in scale.

Section 9 of REG01 provides the methodology for identifying quantitative retail need, including data assumptions. Whilst tourism

¹ The figure of 109m² relates to the 2011-based population projection for Saundersfoot and is an error from the South West Wales Regional Retail Study para 12.26 p.80 of REG01. The correct figure of 68m² can be found in Table 9a, Appendix 10a of REG01.

<p>spend is taken into account in expenditure forecasts, the industry standard for retail assessments takes into account projected population change and expenditure levels.</p>	
<p>b) Should Policy 54 include reference to the need for new retail floorspace in the National Park over the Plan period?</p>	
<p>NPA Response: The Regional Retail Study 2017 (REG01) has indicated that there is no additional capacity for convenience goods within the National Park. Para 4.311 of Exam06 (LDP2 with focussed changes and PPW10 track changes) and the Regional Retail Study indicate that there is a small amount of capacity for comparison goods across the National Park's 4 main retail centres, likely to be occupied by tourist related retailers and be small in scale.</p> <p>Para 39 of the Retail Background Paper (NPA066) states that it is not considered appropriate to allocate additional retail space, or to amend existing LDP policy for retail development when preparing the replacement LDP for the reason explained above. No new proposals for additional retail floorspace were received during the call for Candidate Sites emphasising that the 'market' takes a similar view to the evidence base.</p> <p>Criteria based policies will provide the local policy context from which individual proposals for new retail development within the National Park will be considered through Policy 55 Exam06 (LDP2 with focussed changes and PPW10 track changes).</p>	
<p>c) How will this need for additional retail floorspace be met?</p>	
<p>NPA Response: See previous response.</p>	
<p>d) Are the requirements of Policy 56 supported by robust evidence?</p>	MD
<p>NPA Response: Garden Centres are a distinctive element of retailing in Pembrokeshire and although rarely proposed require a policy context for consideration. The Alternative Options & Appraisal Background Paper NPA057 page 78 to 79 provides further advice.</p>	
<p>9. Do the Plan's retail policies provide an appropriate level of protection and flexibility to manage the hierarchy of shopping areas?</p>	
<p>NPA Response: Para 4.316 and 4.317 of Exam06 (LDP2 with focussed changes and PPW10 track changes) refers to PPW Chapter 4 retail strategies which requires development plans to establish a hierarchy of retail and commercial centres, taking in to account the size, scale, form, function and location of the centres. Once the hierarchy is established, it sets the context for a set of policies which allows development to take place in appropriate centres and at appropriate scales.</p> <p>Paras 4.317- 4.319 of Exam06 (LDP2 with focussed changes and PPW10 track changes) states the reasoning behind the policy approach.</p> <p>The Retail Background Paper (NPA066) supplies the rationale for the retail hierarchy.</p>	

<p>A similar policy (Policy 50) has been in operation since the Local Development Plan 1 (NPA074) was adopted in 2010 and no issues have arisen from its implementation through the Annual Monitoring Reports (NPA077-NPA084).</p>									
<p>a) How will the Plan assess proposals for the redevelopment of existing retail premises for non-retail uses?</p>	MD								
<p>NPA Response: This will be dependent on where the proposal comes forward and what the proposal is for. (Exam06 Local Development Plan 2 with focussed changes and PPW10 track changes) Policies 54 and 55 will impose restrictions in the primary frontage – (Policy 54 and Policy 55c). It will also be dependent on what form of retail the existing building is used for. Policy 53b) for the protection of a community facility may also be relevant. Depending on the proposal there may also be issues of amenity arising, for example a concentration of A3 – Policy 55e).</p>									
<p>10. Is the Plan's retail strategy sufficiently flexible to respond to changing circumstances and does it include clear and appropriate mechanisms for implementation and monitoring?</p>	GL								
<p>NPA Response: The policy approach is founded on the retail hierarchy of the National Park in accordance with national policy. Para 4.312 of Exam06 (LDP2 with focussed changes and PPW10 track changes) states that criteria based policies provide the local policy context from which individual proposals for new retail development within the National Park will be considered. Criteria based policies also provide flexibility in terms of dealing with individual proposals as they come forward.</p> <p>A similar policy (Policy 50) has been in operation since the Local Development Plan 1 (NPA074) was adopted in 2010 and no issues have arisen from its implementation through the Annual Monitoring Reports. (NPA077-NPA084)</p> <p>The SW Wales Regional Report (REG01) undertook a health check of centres. National Park retail centres are generally healthy and attractive with very low vacancy rates. Monitoring is undertaken through annual surveys of centres and the AMR (see indicators 30 and 31)</p>									
<p>Transport</p>	SH								
<p>11. Does the Plan sufficiently promote the integration and co-ordination of transport measures and land use planning?</p>									
<p>a) Should the Plan identify the Road and Cycle schemes identified in Table 3 of the Sustainable Transport Background Paper (NPA068)?</p>									
<p>NPA Response: The list of schemes identified in Table 3 of the Sustainable Transport Background Paper have not been included in the Plan for a variety of reasons:</p>									
<table border="1"> <thead> <tr> <th data-bbox="252 1912 392 1973">Scheme Number</th> <th data-bbox="392 1912 632 1973">Road/Cycle Schemes</th> <th data-bbox="632 1912 995 1973">Update November 2015</th> <th data-bbox="995 1912 1326 1973">Reason for non-inclusion</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Scheme Number	Road/Cycle Schemes	Update November 2015	Reason for non-inclusion					
Scheme Number	Road/Cycle Schemes	Update November 2015	Reason for non-inclusion						

R11	New House Bridge Improvement A4075	Funding is identified to complete the feasibility appraisal for this scheme. It is a possible contender for a Local Transport Fund bid 2016/17 with match funding from Bluestone S106 money.	Work has been undertaken. No further work will be progressed. The scheme is therefore no longer relevant.
R12	Shared Use Path south of Carew Castle	Work is completed.	Completed.
R13	St Petrox Bends Improvement	No progress to date but worthy of retention as a possible future Road Safety Grant scheme. Some feasibility work will be required.	Soundness Test 3 – deliverability – there is no certainty that this scheme will be delivered during the Plan period.
R14	Fan Road/B4316 Junction Improvement, Saundersfoot	Not implemented. No progress to date. Remove from the Plan.	The Highway Authority has advised to remove the scheme from the plan as they are not intending to progress it.
R15	Gumfreston to Tenby Phase 3	Automatic flood warning signs have been ordered. To be installed in 2015/16.	Scheme is complete.
R16	Glasfryn Lane, St Davids	Funding received in 2015/16 for land acquisition, accommodation works and preparation of tender documentation. Some land issues are still to be resolved but now working on the basis of a more softer engineering approach. Hopeful that Local Transport Fund bid for funding to complete the scheme in 2016/17 will be successful.	Scheme is complete.
R17	A40 Canaston Bridge	Scheme completed and road opened on 16 th March 2011.	Scheme is complete.
12. Does the Plan adequately promote active travel, and reduce the need to travel?			
<p>NPA Response: Yes. Paragraphs 4.14 to 4.24 of Exam 06 – Local Development Plan with Focussed Changes and PPW Edits – details the strategic approach in directing new development to Centres with a range of facilities and services available and emphasising public transport. The Alternative Options and Appraisal Background Paper (NPA057) details the spatial strategy options considered and the outcomes of the Plan strategy performance against the sustainability objectives.</p>			
13. Are the requirements of Policy 58 clear and consistent with the requirements of national policy?			
<p>NPA Response: Yes. Please see the assessment of Policy 58 on pages 79 and 80 of the Alternative Options and Appraisal Background Paper NPA057. The policy has been operated effectively in Local Development Plan 1 (see annual monitoring reports NPA077 – NPA084, indicators 30 and 31).</p>			

Community Facilities	MD
14. Is the Plan's approach to community facilities appropriate and founded on robust evidence?	
NPA Response: NPA057 Alternative Options and Appraisal Background Paper page 75 and 76 provides a commentary on the robustness of Policy 53. A similar policy (Policy 48) has been in operation since the Local Development Plan 1 (NPA074) was adopted in 2010 and no substantive issues have arisen from its implementation through the Annual Monitoring Reports. NPA077-NPA084	
15. Does Policy 53 provide an appropriate mechanism for securing new community facilities and infrastructure?	
NPA Response: See previous response.	
a) Does the policy provide an appropriate framework for the protection of existing, and delivery of future, community facilities and infrastructure?	
NPA Response: See previous response.	
b) Does the policy provide a clear and consistent framework for securing planning obligations?	
NPA Response: See previous response.	

Session 5 – Visitor Economy, Employment, Community Facilities, Retail and Transportation

Representor	Change sought	Why NPA do not think this is a sound approach
Pembrokeshire County Council 2708/73	See Deposit Plan representations and responses – NPA19	See across.
Marloes & St Brides Community Council 2897/100	See Deposit Plan representations and responses – NPA19	See across.
2897/101	See Deposit Plan representations and responses – NPA19	There may be a misunderstanding regarding the intention of the statement in the Plan. There would be issues arising regarding Test 1 compliance with national planning policy with the change suggested.
2897/111	See Deposit Plan representations and responses – NPA19	See across.
2897/112	See Deposit Plan representations and responses – NPA19	See across.
2897/113	See Deposit Plan representations and responses – NPA19	See across.
2897/114	See Deposit Plan representations and	See across.

Representor	Change sought	Why NPA do not think this is a sound approach
	responses – NPA19	
St Davids City Council 2910/118	See Deposit Plan representations and responses – NPA19	Test 3 – there are issues regarding the deliverability of Candidate Site 3.
2910/119	See Deposit Plan representations and responses – NPA19	Test 3 – there are issues regarding the deliverability of this site for live work units.
2910/120	See Deposit Plan representations and responses – NPA19	See across and above for the previous St Davids City Council comments.
2910/121	See Deposit Plan representations and responses – NPA19	Test 1 regarding compliance with national planning policy depending on the level of growth envisaged. Test 2 potentially as well regarding appropriateness and Test 3 regarding deliverability if allocations are proposed.
Bourne Leisure (Lichfields) 1092/99	See Deposit Plan representations and responses – NPA19	See across.
1092/103	See Deposit Plan representations and responses – NPA19	See across. Relates to issues around Supplementary Planning Guidance procedures for preparation.
1092/107	See Deposit Plan representations and	See across. More an issue of clarity regarding

Representor	Change sought	Why NPA do not think this is a sound approach
	responses – NPA19	the use of conditions rather than soundness tests.
1092/108	See Deposit Plan representations and responses – NPA19	See across. More an issue around clarity of policy wording.