
Pembrokeshire Coast National Park Local Development Plan

(end date 2031)

Background Paper No *: Green Wedge Review

March 2018

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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Aim of this Paper

1. This document originally set out the approach for the review of Green Wedges of Pembrokeshire Coast National Park during Local Development Plan preparation.
2. The aim of this background paper is to inform whether Green Wedges should be retained or amended within the replacement National Park Local Development Plan and whether provision should be made for designating new Green Wedges.

National Planning Policy

3. Planning Policy Wales Edition 9 (November 2016) provides advice about the purposes of a Green Wedge, and the requirement for their review as part of the Local Development Plan review.

“Around towns and cities there is often the need to protect open land. Local Planning Authorities need to consider establishing green belts and making local designations such as Green Wedges. Both Green belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development, and can take on a variety of spatial forms. The essential difference between them is the issue of permanence. Land within a green belt should be protected for a longer period than the current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process”

“Both green belts and Green Wedges can

- Provide opportunities for access to the open countryside
- Provide opportunities for outdoor sport and outdoor recreation
- Maintain landscape / wildlife interest
- Retain land for agriculture, forestry and related purposes
- Improve derelict land; and
- Provide carbon sinks and help to mitigate the effects of urban heat islands”

“However, the extent to which the use of land fulfills these objectives is not a material factor in determining whether land should be included within a Green Belt or Green Wedge.”

“The purpose of a Green Belt is to

- Prevent the coalescence of large towns and cities with other settlements

- Manage urban form through controlled expansion of urban areas
- Assist in safeguarding the countryside from encroachment
- Protect the setting of an urban area
- Assist in urban regeneration by encouraging the recycling of derelict and other urban land.” (Planning Policy Wales 2016 paras 4.8.1-4.8.3)

“Local designations such as green wedge may be justified where land is required to serve the same purposes to a Green Belt, but these designations do not convey the permanence of a Green Belt.” (Planning Policy Wales 2016 para 4.8.10)

4. Green Wedges should be established through development plans. Local Planning Authorities (LPAs) should only maintain Green Wedges where they can demonstrate that normal planning and development control policies cannot provide the necessary protection. They should state in their development plans the areas that require extra protection and why. (Planning Policy Wales 2016 para 4.8.11)

“In defining Green Wedges it is important to include only land that is strictly necessary to fulfil the purposes of the policy. Factors such as openness, topography and the nature of urban edges should be taken into account. Clearly identifiable physical features should be used to establish defensible boundaries. Green Wedge policies should be reviewed as part of the development plan review process. The general policies controlling development in the countryside apply in Green Wedges, but there is, in addition, a general presumption against development which is inappropriate in relation to the purposes of the designation.” (Planning Policy Wales 2016 para 4.8.12).

5. In considering green wedges, LPAs will need to ensure that a sufficient range of development land is available which is suitably located in relation to the existing urban edge and the proposed green wedge. (Planning Policy Wales 2016 para 4.8.13).

6. Inappropriate development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm which such development would have on the Green Wedge. Green Wedge policies in development plans should ensure that any applications for inappropriate development would not be in accord with the plan. These very exceptional cases would therefore be treated as departures from the plan. (Planning Policy Wales 2016 para 4.8.15)

7. The construction of new buildings in a green wedge is inappropriate development unless it is for the following purposes:

- Justified rural enterprise needs

- Essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the green wedge and which do not conflict with the purpose of including land within it;
 - Limited extension, alteration or replacement of existing dwellings
 - Limited infilling (in these settlements and other development sites which have been identified for limited infilling in the development plan) and affordable housing for local needs under development plan policies; or
 - Small scale diversification with farm complexes where this is run as part of the farm business (Planning Policy Wales 2016 para 4.8.16)
8. The re-use of buildings in a Green Wedge is not inappropriate development provided that:
- The original building is substantial, permanent and capable of conversion without major construction
 - The new use will not have a greater impact on the openness of the Green Wedge and the purposes of including land within it. Strict control will need to be exercised over the extension, alteration or any associated use of the land for re-used buildings; and
 - The building is in keeping with its surroundings. (Planning Policy Wales 2016 para 4.8.17)
9. Other forms of development would be inappropriate development unless they maintain the openness of the Green Wedge and do not conflict with the purposes of including land within it. (Planning Policy Wales 2016 para 4.8.18)

Local Application

10. The National Park is largely rural in nature. Green Wedges however play an important role to ensure that the landscape setting of urban and rural settlements is protected from inappropriate development. Pressures for development outside of Centre boundaries within the National Park can result in an erosion of the openness and a detrimental effect on the character and special qualities of the area and the physical encroachment of built areas. Such development, alone or cumulatively, can have a detrimental impact on the character and landscape of the National Park.

Assessment

Stage 1: Identification of Existing Local Development Plan Green Wedges

11. Existing Green Wedges are designated within the Local Development Plan – see the Proposals Map - and are listed in this paper, there are 43 in total. They are the result of a detailed assessment of a total of 94 potential sites (Appendix C). Officers identified settlements / locations where there was a need to undertake an evaluation to assess the potential for a Green Wedge. Additional locations were also considered during the survey process and the methodology (Appendix B) was applied to establish the appropriateness of designating Green Wedges at these locations for the Local Development Plan. These sites need to be re-assessed as part of the review process, this paper has been updated to reflect that assessment.

Stage 2: Identification of New Green Wedges

12. It is not considered necessary at this stage to consider the designation of new Green Wedges, beyond the original 94 sites included within the assessment (Appendix C) conducted as part of the original Local Development Plan production process. This was a comprehensive formal assessment that covered the whole National Park. Changes that have occurred since in policy context, development pressures and in the physical environment of the National Park are not considered sufficient to warrant a new study at this stage. Should new settlement boundaries either for new or existing Centres be proposed as part of the Review, the requirement for new or amended Green Wedges will be considered as part of this process. This paper will be updated accordingly.
13. The assessment process set out at Appendix B has provided the basis for whether a Green Wedge was required in the adopted plan.

Stage 3: Green Wedge Evaluation

14. The evaluation for Local Development Plan Green Wedges included
 - A photographic record of the Green Wedge
 - A general description of the location, size and existing characteristics of the area under consideration as Green Wedge
 - The characteristics of land surrounding the potential Green Wedge

- Consideration of the findings of the Landscape Character Assessment and Settlement Capacity Study for the National Park.
 - A review of planning policy, which includes the sites designation within the Joint Unitary Development Plan and emerging Local Development Plan at the time, environmental designations and development pressures which may support or negate the need for Green Wedge Designation.
15. There is a further stage which considers the role and suitability of the proposed green wedge in relation to the purposes outlined within Planning Policy Wales (2016). This considers whether a Green Wedge would
- Prevent the coalescence of large towns and cities with other settlements
 - Manage urban form through the controlled expansion of urban area;
 - Assist in safeguarding the countryside from encroachment;
 - Protect the setting of an urban area;
 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land.
16. These purposes provide justification for the designation of a Green Wedge, provided other policies would not be able to achieve the same objectives. Pembrokeshire Coast National Park is essentially a rural planning authority, and as such Green Wedge potential has been considered for both urban and rural areas. This enables smaller local villages and their settings to be included in the process, in the interests of seeking to conserve and enhance the special qualities of the National Park.
17. Planning Policy Wales (2016) (para 4.8.11) states that local planning authorities should only maintain Green Wedges where they can demonstrate that normal planning and development control policies cannot provide the necessary protection. A central part of this process has therefore been to assess the potential for other policies to safeguard areas from inappropriate development.
18. The proposed Green Wedges (94 in total) were assessed to consider whether the Policies of the Local Development Plan were sufficient to provide normal planning and development control policies. The Policies of the Local Development Plan and national policy were

considered sufficient in relation to the following assessments at Local Development Plan adoption¹.

19. These considerations are set out as follows -

Green Wedge Character	Existing policy protection	Conclusion
Deciduous woodland	The importance of woodland is identified at 5.2.9 of Planning Policy Wales (2016), and Policy 8 Local Development Plan Special Qualities.	<p>There is no need to identify woodland as Green Wedge, since protection exists under alternative policy.</p> <p>GW1 Amroth / GW24 Hook / GW30 Llangwm – southern shore of Llangwm Pill / GW69 Saundersfoot Rhode Wood / GW90 Butts field /</p>
Significant gap between built areas within the countryside	Paragraph 9.3.3 of Planning Policy Wales (2016) advises that insensitive infilling or redevelopment, including conversion and adaptation, should not be allowed to damage an area's character and amenity.	<p>Significant gaps between built areas do not provide sensitive infilling or small extension opportunities, and protection is afforded under Policy 7 of the LDP for countryside locations. This includes locations outside the identified Centre boundaries at Tier 2, 3 and 4 locations which for the purposes of planning policy are considered countryside locations.</p> <p>GW3 Bosherton / GW50 Newport north of castle GW52 Newport north of Parrog / GW53 Newport between north of old town and estuary / GW61 Pontfaen / GW87 Square and Compass (A487)/ GW27 Little Haven by NPA Car Park/</p>

¹ Areas assessed are listed under the main issue only. In some cases several issues are identified and the main report for each area assessed at Appendix C should be read to confirm these.

Green Wedge Character	Existing policy protection	Conclusion
		GW75 Solva adjacent to Junior School / GW77 St Davids east of Glasfryn Lane, area of 'farm' field /
Potential for sensitive infill.	Policy 7 Countryside (Tier 5) Local Development Plan permits sensitive filling in of small gaps or minor extensions to isolated groups in the countryside.	Tier 5 settlements have the potential for infill or small extension. These sites could satisfy these requirements and designation as a Green Wedge would unnecessarily restrict this opportunity. GW21 Freshwater East / Chapel Lane / GW22 Freshwater East / Portclew Road / GW60 Pisgah / GW63 & GW64 Port Lion / GW86 Summerhill, south GW92 Whitehill Branders Park / GW93 Whitehill / Teagues Cross / GW20 Freshwater East / Trewent Hill / GW56 Newton Mountain south of chapel /
Within LNR	Policy 10 Local Sites of Nature Conservation or Geological Interest of the Local Development Plan resists development or land use changes that would be liable to significantly harm the nature conservation value of a site of local nature conservation interest.	The site is entirely within the LNR for Freshwater East and protection is provided under Policy 10 Local Sites on Nature Conservation or Geological Interest'. GW23 Freshwater East south west
Required for development	Planning Policy Wales 4.8.13 states that when considering green wedges local planning authorities will need to ensure that a sufficient range of development land is available which is suitably located in	The boundary of the Green Wedge co-incides with or overlaps significantly with a proposed development site, and because of the need to ensure sufficient range of development land Green Wedge designation is

Green Wedge Character	Existing policy protection	Conclusion
	relation to the existing urban edge and the proposed green wedge.	<p>not supported. See Table 3 Allocations of Employment /Mixed Use Sites and Table 7 Allocations of Housing Sites.</p> <p>GW37 Manorbier in vicinity of School / GW49 Newport east of Newport Castle/ GW75 Solva Adjacent to Junior School/ GW76 St Davids west of Nun Street / GW83 St Ishmaels Trewarren Road east /</p>
Visually prominent	Policy 30 Amenity of the Local Development Plan resists development in visually prominent locations.	<p>Policy 30 Amenity would also apply with regard to visual intrusion.</p> <p>GW29 Little Haven / Strawberry Hill / GW70 Saundersfoot north of Castle View and Whitlow / GW71 Saundersfoot, south of Coppit Hall / GW72 Simpson Cross south of A487 /</p>
Existing development at the site	The site does not, by virtue of its characteristics, lend itself to designation as a green wedge. Examples include areas of built and permanent development, (greater than isolated dwellings or farms), surfaced car parks.	<p>The site is an existing car park and cannot, in character or use be considered to have the potential for an effective green wedge.</p> <p>GW71 Saundersfoot, south of Coppit Hall /</p>
Protected by existing Policy (Special Qualities)	Policy 8 Special Qualities. The Special Qualities of the proposed green wedges have been considered to establish whether the special qualities of the area would be sufficient to restrict development.	<p>The Special Qualities of the National Park are set out in policy 8 and are sufficient to ensure protection from inappropriate development in many cases.</p> <p>GW 6 & 7 Broad Haven North / GW14 Dinas Cross / Brynhenllan / GW15 Dinas Cross playing fields / GW25 Houghton (east of Burton</p>

Green Wedge Character	Existing policy protection	Conclusion
		Road)/ GW29 Little Haven / Strawberry Hill south west / GW59 Nolton Haven near caravan site at Folkston Hill / GW85 St Ishmaels, south east of Seamar /
Site specific considerations	These are i) areas of International or National designation ii) setting of a listed building iii) scheduled ancient monument iv) Flood Zones v) Historic Parks and Gardens vi) Centre boundaries	These are considered on a site by site basis and may negate the requirement for a Green Wedge. GW26 Lawrenny by church/

20. A desk top study of aerial photography dated 2014 and the planning history of these sites has indicated that no significant changes in circumstance or context, on any of the sites, would now merit their inclusion as new Green Wedge sites as part of the Local Development Plan review.

21. Planning Policy Wales (2016) emphasises the importance of openness as an attribute of Green Wedges and the maintenance of openness in the consideration of inappropriate development. (see paragraphs 4.8.5 to 4.8.18 of Planning Policy Wales).

22. There are policies within the Deposit Local Development Plan which permit limited development outside of Centre boundaries. These include for example, Local Waste Management Facilities (Policy 28), Renewable Energy (Policy 34), One Planet Development (Policy 52), Community Facilities & Infrastructure Requirements (Policy 53), Garden Centres (Policy 56), which do not take account of openness in the consideration of planning proposals.

23. Whilst in some areas of the National Park, other policies are considered sufficient to resist inappropriate development, (see table above) this is not the case for all evaluated Green Wedges. Where normal development control practice would not ensure that openness is maintained, the area is proposed as a Green Wedge. In some cases, additional reasoning is also provided to support designation as a Green Wedge.

24. The approach to the survey was undertaken using a precautionary approach. Wherever there was doubt as to whether development adjoining a settlement should or should not occur or whether adjacent settlements should or should not be allowed to coalesce a potential Green Wedge was identified. This led to the identification of 94 potential Green Wedges. A further refinement to the process, which assessed the potential for other policies to provide a framework for the consideration of proposals was undertaken. This effectively reduced the number of green wedges proposed through the first Local Development Plan to 43. As part of the replacement plan process, a further 2 designations have been removed (see paragraph 27 below) and 2 boundary changes have occurred (see paragraph 27 below). A total of 41 green wedges are now proposed in the Deposit Local Development Plan as follows -.

Proposed Green Wedge Reference	Green Wedge
GW2	Angle
GW4	Between Broad Haven and Little Haven
GW5	Broad Haven East
GW8	Central Meadows Dale
GW10	Dinas Cross north side of A487
GW11	Dinas cross south of A487
GW13	East Feidr Fach Brynhenllan
GW16	Dinas Cross Village Green
GW17	Dinas Cross south of A487 – Tennis Courts
GW18	Pen y Foel Dinas Cross West
GW19	South Glanafon Dinas Cross West
GW32	Manorbier east of Warlow Meadow
GW33	Manorbier west of B4585
GW34	Manorbier Skrinkle south of Wheelers Way
GW35	Manorbier to Skrinkle
GW36	Manorbier east of B4585
GW38	Marloes
GW46	New Hedges east of B4316
GW47	New Hedges north east of Knightston Close
GW48	Newport north side of A487
GW51	Newport south of A487
GW54	West of Morawelon, Parrog Newport
GW55	South Rock House, Parrog Newport

Proposed Green Wedge Reference	Green Wedge
GW57	Between the Burgage and Saxondale Nolton Haven
GW58	North West Nolton
GW62	Porthgain central green
GW66	Saundersfoot King George V playing Fields
GW67	West of Rusheylake Bridge Saundersfoot
GW68	Broadfield west of B4316 Saundersfoot
GW73	Between Upper and Lower Solva
GW74	Solva, East of Ford road
GW78	St Davids, North of Feidr Pant y Bryn
GW79	St Davids east of Feidr Caerfai, south of Feidr Pant y Bryn
GW80	St Davids west of Ffynnon Wen
GW81	St Davids east of Waun Isaf
GW82	St Davids between Catherine Street and Pigs Lane
GW84	St Ishmaels north of Trewarren Road west
GW88	Tenby east of A487 between New Hedges and Brynhir
GW89	Clickett Lane, Tenby West
GW91	Trefin North west
GW94	East of Manorbier

25. As part of the replacement plan process, desk top study of aerial photography dated 2014 and the planning history of these sites indicated that no significant changes in circumstance, on any of the above sites, would merit their removal or alteration in the replacement plan (those that have been amended or removed are listed in paragraph 27 below).
26. In response to comments received during the consultation of the replacement Local Development Plan Preferred Strategy, the assessments contained in Appendix C to this paper have been further reviewed and updated to justify the retention of the above Green Wedges within the replacement plan. The consideration of sites for their development potential as part of the replacement plan process has not been prohibited by the current Green Wedge designations in the Local Development Plan, which have themselves been the subject of review.

Changes to Green Wedges

27. Since the last Green Wedge Paper was published alongside the Review Report the Authority has invited the submission of Candidate Sites (sites for development or protection) and refined its proposals for development and final designations in the Deposit Plan.
28. As a result of the replacement plan process, 2 existing green wedges are removed and 2 have boundary amendments as shown in the Deposit Proposals Maps, these assessments have been updated in Appendix C to this paper, a summary is provided below:
 - Green Wedge 9 West of Feidr Fawr (GW9) – removed as a result of landscape capacity for development being identified within the Settlement Capacity Study for Dinas Cross (2014). This site is not an allocation and is not included within the revised centre boundary for Dinas Cross (See Site Assessment 125 West of Feidr Fawr in the Candidate Site register).
 - Green Wedge 12 West of Feidr Fach Brynhenllan (GW12) – removed as a result of landscape capacity for development being identified within the Settlement Capacity Study for Dinas Cross (2014). This site is not an allocation and is not included within the revised centre boundary for Dinas Cross (See Site Assessment 124 east of Tower Hill in the Candidate Site register and Site Assessment 303 East of Tower Hill in the New and Amended Sites Register).
 - Green Wedge 18 Pen y Foel Dinas Cross West (GW18) – the boundary has been amended to include the frontage to the A487 only (See Appendix C Assessment and Deposit Proposals Map).
 - Green Wedge 38 Marloes (GW38) – the boundary has been amended to omit the exceptional land release development for affordable housing in the south west corner (See Appendix C Assessment and Deposit Proposals Map).

Appendix A: Replacement Local Development Plan Proposed Green Wedges

Green Wedge
Angle
Between Broad Haven and Little Haven
Broad Haven East
Central Meadows Dale
Dinas Cross north side of A487
Dinas cross south of A487
East Feidr Fach Brynhenllan
Dinas Cross Village Green
Dinas Cross south of A487 – Tennis Courts
Pen y Foel Dinas Cross West
South Glanafon Dinas Cross West
Manorbier east of Warlow Meadow
Manorbier west of B4585
Manorbier Skrinkle south of Wheelers Way
Manorbier to Skrinkle
Manorbier east of B4585
East of Manorbier
Marloes
New Hedges east of B4316
New Hedges north east of Knightston Close
Newport north side of A487
Newport south of A487
West of Morawelon, Parrog Newport
South Rock House, Parrog Newport
Between the Burgage and Saxondale Nolton Haven
North West Nolton
Porthgain central green
Saundersfoot King George V playing Fields
West of Rusheylake Bridge Saundersfoot
Broadfield west of B4316 Saundersfoot
Between Upper and Lower Solva
Solva, East of Ford road
St Davids, North of Feidr Pant y Bryn
St Davids east of Feidr Caerfai, south of Feidr Pant y Bryn
St Davids west of Ffynnon Wen
St Davids east of Waun Isaf
St Davids between Catherine Street and Pigs Lane
St Ishmaels north of Trewarren Road west
Tenby east of A487 between New Hedges and Brynhir

Clickett Lane, Tenby West
Trefin North west

A more detailed assessment for each of these Green Wedges is appended to this report as Appendix C

Appendix B Green Wedge Proforma ²

Evaluation	
	A : Site Description
General Location	
Size	
Existing land uses / Characteristics (including existing development)	
Adjacent land uses	
	B : Planning Policy
JUDP designation	
Environmental designation / constraints	
Development Pressures ³ e.g. has any green wedge impacted on existing uses?	
	C : Green Wedge Review
Settlement Character ⁴	
Would the green wedge contribute to the setting of the settlement?	
Will the green wedge prevent the coalescence of settlements?	
Will the green wedge help to safeguard the countryside from encroachment?.	
Will the green wedge manage urban form through its controlled expansion?	

² Any relevant findings from the LCA or settlement study are to be integrated within this report , and referenced. Where such information is in addition to the headings raised, use as additional considerations.

³ This should include development which would accord with the green wedge designation as well as complementary development. Pre- application discussions are not included in this assessment.

⁴ Use the Landscape Character Assessment and Settlement Capacity Study to assist with these deliberations

Land Regeneration	
Is the green wedge likely to assist regeneration by encouraging the recycling of derelict and other land?.	
Can other policies of the plan achieve these objectives? Explain which policies and how.	
	D : Overall Conclusion
Designate Green Wedge	Yes or No
Extent of the Green Wedge	
If yes , does the green wedge follow physical boundaries? Are they logical and defensible?	
Is any Amendment to the settlement boundary required?	
	E : Overall Recommendation

References

Planning Policy Wales Edition 9 (November 2016), Welsh Government;

<http://gov.wales/docs/desh/publications/161117planning-policy-wales-edition-9-en.pdf>

Web link shown above was accessed on 12 February 2018