

**Adroddiad i Awdurdod  
Parc Cenedlaethol Arfordir  
Penfro**

**Report to Pembrokeshire  
Coast National Park  
Authority**

**gan Nicola Gulley MA MRTPI**  
Arolygydd a benodir gan Weinidogion Cymru  
Dyddiad: **13 Mai 2020**

**by Nicola Gulley MA MRTPI**  
an Inspector appointed by the Welsh Ministers  
Date: **13 May 2020**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 64

**REPORT ON THE EXAMINATION INTO THE  
REPLACEMENT PEMBROKESHIRE COAST  
NATIONAL PARK LOCAL DEVELOPMENT PLAN  
2015 – 2031**

Plan submitted for examination on 22 February 2019

Examination hearings held between 2 July and 1 October 2019

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## Abbreviations used in this report

AHVS	Affordable Housing Viability Study
BCIS	Building Cost Information Service
CIMSP	Collections, Infrastructure and Market Sector Plan
CIS	Community Involvement Scheme
DA	Delivery Agreement
DRF	Dwelling Requirement Figure
FC	Focussed Changes
GTAA	Gypsy and Travellers Accommodation Assessment
HER	Historic Environment Record
HLS	Housing Land Supply
HRA	Habitats Regulations Assessment
HS/AP	Hearing Session / Action Point
JHLAS	Joint Housing Land Availability Study
LDP	Local Development Plan
LHMA	Local Housing Market Assessment
LSA	Local Search Area
MAC	Matters Arising Change
MTAN	Minerals Technical Advice Note
N/LNR	National / Local Nature Reserve
PCNP/A	Pembrokeshire Coast National Park / Authority
PPW	Planning Policy Wales
RIA	Retail Impact Assessment
RIGS	Regionally Important Geodiversity Site
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SPA	Special Protection Area
SEA	Strategic Environmental Assessment
SFCA	Strategic Flood Consequences Assessment
SINCs	Sites of Important for Nature Conservation
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
RTS	Regional Technical Statement
TAN	Technical Advice Note
WCFG Act	Well-being of Future Generations (Wales) Act 2015
WG	Welsh Government
WLSA	Welsh Language Sensitive Area
WSP	Wales Spatial Plan

## **Non-Technical Summary**

This report concludes that, subject to the recommended Matters Arising Changes (MACs) set out in Appendix A, the Replacement Pembrokeshire Coast National Park Authority Local Development Plan (LDP) provides an appropriate basis for the planning of the National Park up to 2031. The National Park Authority has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered.

A number of changes are needed to meet legal and statutory requirements and to ensure that the Plan is sound. These do not alter the thrust of the National Park Authority’s overall strategy and do not undermine the Sustainability Appraisal carried out by the National Park Authority. The main changes are summarised as:

- The amendment of the reasoned justification to ensure that the strategy arising from the key issues, vision and objectives is coherently expressed;
- The revision of (Strategy) Policy 7 to clarify the types of development that are acceptable in the countryside;
- An increase in the amount of new market housing to be built over the Plan period; and clarification of where new market and affordable housing development can take place within the National Park through the provision of a new housing management policy;
- An uplift in the target for affordable housing to be built over the Plan period; the inclusion of a new rural exceptions policy; and amendments to the reasoned justification to provide support for the development of affordable housing led schemes in appropriate locations in the National Park;
- The identification of additional areas of open space in Tenby;
- The revision of policies in relation to the management of biodiversity to ensure that they provide a robust and coherent framework, and accord with the requirements of national policy;
- The deletion of policies in relation to the historic environment and one planet development, to ensure compliance with national policy;
- Amendments to the Proposals Map to include relevant policy designations; and
- Revisions to other policies, the reasoned justification and the monitoring framework to align with national policy and guidance and/or evidence.

Almost all of the recommended changes have been put forward by the National Park Authority in response to matters discussed during the examination. With the recommended changes the Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness included in the Welsh Government’s Development Plans Manual Edition 3, March 2020.

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## 1 Introduction

- 1.1 Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004 (the 2004 Act), the purpose of the independent examination of a Local Development Plan is to determine:
  - a) whether it satisfies the requirements of sections 62 and 63 of the 2004 Act and of regulations under section 77, and
  - b) whether it is sound.
- 1.2 This report contains the assessment of the Replacement Pembrokeshire Coast National Park Local Development Plan 2015 – 2031 (from here referred to as “the LDP” or “the Plan”) in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the 2004 Act.
- 1.3 The submitted LDP has been prepared pursuant to the 2004 Act and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) (‘the LDP regs’). I have considered it against the tests of soundness set out in Chapter 6 of the Development Plans Manual (Edition 3 – March 2020):
  1. Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?);
  2. Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?);
  3. Will the plan deliver? (i.e. is it likely to be effective?)
- 1.4 The starting point for the examination is that the Local Planning Authority has submitted what it considers to be a sound plan, together with the evidence base that supports its position.
- 1.5 Since the purpose of the examination is to determine whether the Plan is sound, I recommend changes in this report only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. I am satisfied that these changes are in line with the substance of the overall Plan and its policies, and do not undermine the Sustainability Appraisal (SA) and participatory processes that have been undertaken.
- 1.6 All duly made representations and the matters raised at the examination Hearings have been considered. Given the focus of the examination on soundness, my report does not refer specifically to the individual representations made in each case. Matters raised by individual representations are referred to only where it is considered that they raise substantive issues concerning the Plan’s soundness. Plan changes sought by any representor are the subject of a recommended change only where I have found, on the basis of the evidence, that such a change is required to make the Plan sound.
- 1.7 Alternative site allocations were proposed by some representors. There are likely to be several ways that the Authority could meet the needs of its community, each of which may be sound. Some may consider that the

allocations in the Plan do not represent the best solution, but I may only recommend changes where they are necessary for soundness. I have therefore not referred to specific alternative sites in this report.

*Post-Deposit Changes OR Changes arising during the course of the examination*

- 1.8 Prior to submission of the LDP for examination the Authority considered the representations received and decided to make a number of Focussed Changes to the deposit Plan. These changes were advertised, and the responses taken into account. At the Pre-Hearing Meeting the Authority confirmed that the Plan it wishes to be examined is the deposit LDP as modified by the Focussed Changes<sup>1</sup>. Since the Focussed Changes have been consulted on and the SA has been revisited where necessary, they are accepted as part of the submitted LDP. The deposit Plan as modified by the Focussed Changes has therefore formed the starting point for the examination of the Plan’s soundness.

*Recommended Changes*

- 1.9 The Authority has prepared a range of Matters Arising Changes (MACs) and Map Matters Arising Changes (MMAPs) following the discussions at the hearing sessions<sup>2</sup>. These MACs were publicised on the examination website and, together with a revised SA, HRA and Equalities Impact Assessment, consulted on for a 9-week period between 10 January and 13 March 2020. I have taken account of all representations duly made during the consultation period in arriving at my final recommendations.
- 1.10 Almost all of the MACs put forward by the Authority are needed as the Plan would be unsound without them. However, in a small minority of cases MACs have been put forward which, although providing helpful additional clarity and precision, are not strictly required to make the Plan sound. Accordingly, these are not the subject of a binding recommendation, although I understand the Authority’s wish to incorporate them. The MACs and MMAPs numbered in **bold type** in Appendix A are the changes put forward that are required to make the Plan sound. These are all addressed in this report, where the relevant MAC and/or MMAP number is similarly identified in bold type. Changes advanced by the Authority which are not required in order to make the Plan sound are only mentioned in the report where relevant to my conclusions and recommendations.
- 1.11 The Authority has also identified some outstanding typographical or factual errors in the submitted Plan that it wishes to correct. I authorise any final editorial changes of this nature, together with any other presentational matters and consequential changes flowing from agreed MACs and MMAPs such as altered policy cross-references, site area or numerical changes and paragraph numberings.

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<sup>1</sup> NPA022

<sup>2</sup> Exam 136

### *National Policy and Guidance*

- 1.12 A number of changes to national policy/ guidance were made immediately before or during the examination, most notably: Planning Policy Wales, (Edition 10, December 2018) (PPW 10) was published during the focussed changes consultation; and a letter from the Minister for Housing and Local Government in respect of the provision of affordable housing was issued during the hearing sessions<sup>3</sup>. These changes were discussed at the Hearings and are referred to under the relevant sections of the report. Consequently, some changes to the Plan have been proposed by the Authority. Subject to these recommended changes, I am satisfied that the LDP accords with national policy. These changes are included in Appendix A: Schedule of Matters Arising Changes (MAC).
- 1.13 Since the completion of the hearing sessions of the examination a number of new changes have been made to national policy/guidance. These include:
- A letter from the Minister for Housing and Local Government dated the 26 March advising, with immediate effect, the: revision of PPW 10; revocation of Technical Advice Note 1: Joint Housing Land Availability Studies (2015); and the publication of the Development Plans Manual, Edition 3 (The Manual). The revision of PPW 10 removes the five-year housing land supply policy and replaces it with a policy statement making it explicit that the housing trajectory, as set out in the adopted LDP, will be the basis for monitoring the delivery of development plan housing requirements as part of LDP Annual Monitoring Reports. The Manual (Edition 3) provides, amongst other things, additional guidance on the process of monitoring against the housing trajectory. Although the examination has been conducted principally in the context of PPW 10 and the Local Development Plan Manual (Edition 2), regard has been had to the possible revision of PPW 10<sup>4</sup> and the requirements of the emerging Manual. Consequently, changes have been proposed by the NPA which will ensure that the Plan is consistent with the requirements of revised national policy/guidance. These changes are included in the Appendix A: Schedule of Matters Arising Changes (MAC) recommended by the Inspector.
  - The Welsh National Marine Plan was issued by the Welsh Government (WG) in November 2019. The Plan provides a framework for the sustainable management of the seas and coastline of Wales and represents the start of a process of shaping the seas to support economic, cultural and environmental objectives. Although issued after the oral sessions of the Examination were completed, many of the themes in the Plan, particularly in relation to matters such as achieving a sustainable marine economy, ensuring a strong, healthy and just society and living within environmental limits, were discussed. In view of this I am content that, subject to the MACs, the Replacement LDP accords with the requirements of the Marine Plan.

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<sup>3</sup> Minister for Housing and Local Government’s letter of 8<sup>th</sup> July 2019

<sup>4</sup> WG consultation document entitled ‘Delivery of housing through the planning system’ (October 2019).

## 2 Preparation Requirements

- 2.1 The legal and regulatory preparation requirements are set out in the 2004 Act and the LDP Regs. Chapter 1 of PPW and Chapter 6 of the Development Plans Manual (Edition 3 – March 2020) provide guidance as to these requirements.
- 2.2 The LDP has been prepared in accordance with the Delivery Agreement (as revised by agreement with the Welsh Government<sup>5</sup>) and the Community Involvement Scheme (CIS) as demonstrated in the Consultation Report.
- 2.3 Concern was expressed regarding the definition of consultation bodies and key stakeholders in the CIS and the approach taken to engagement / public consultation throughout the plan making process. Although I understand the criticisms that have been made, I am satisfied that the approach taken accords with the requirements of the LDP Regs , the Development Plans Manual (Edition 3 – March 2020) and the Authority’s CIS and the ways of working set out in section 5 of the Well-being of Future Generations (Wales) Act 2015 (WFG Act).
- 2.4 All proposed changes made to the deposit Plan, as outlined in the above Introduction, have been advertised and consulted on. The Plan thus complies with the requirements of the LDP Regs in this respect, including in relation to consultation, advertisement and the publication and availability of prescribed documents.
- 2.5 The Plan has been subject to SA including Strategic Environmental Assessment (SEA)<sup>6</sup>. Further changes put forward by the Authority as part of the examination process have likewise been tested where necessary for any impacts they have upon the SA and SEA<sup>7</sup>. I am satisfied that the SA/SEA process undertaken is robust and satisfies procedural and legal requirements.
- 2.6 In accordance with the Habitats Directive<sup>8</sup> a Habitats Regulations Assessment (HRA)<sup>9</sup> of the Plan has been undertaken and reviewed as necessary in the light of changes put forward during the examination<sup>10</sup>. The HRA Screening Report concluded that a number of key European Sites may be affected by the LDP and the HRA process should be continued. The key European Sites highlighted in the Screening Report were subject to detailed assessments, these included the Pembrokeshire Marine Special Area of Conservation (SAC) and the Pembrokeshire Bats and Bosherton Lakes SAC. Mitigation measures outlined in the HRA, in the form of suggested case-specific policy restrictions or caveats, have been included in the Plan through **MAC 36 37, 38 and 39**. As such, I am satisfied that the HRA undertaken shows that no significant effects upon the integrity of the European sites within the Plan area or in adjacent areas are likely to occur (either alone or in combination with other plans or projects) as a

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<sup>5</sup> NPA001

<sup>6</sup> NPA008, NPA009, NPA010, NPA011, NPA012, NPA013 and NPA014

<sup>7</sup> Exam 137

<sup>8</sup> European Union Habitats Directive (92/43/EEC)

<sup>9</sup> NPA015

<sup>10</sup> Exam 138



result of implementing the Plan.

- 2.7 The Public Sector Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. The Authority has undertaken and publicised an Equality Impact Assessment<sup>11</sup> of the LDP to ensure that such issues have been taken into account throughout the Plan preparation process. I am satisfied that this process ensures that the LDP promotes equality and diversity and does not adversely affect or discriminate against any people who are protected under the Equality Act 2010.
- 2.8 The Planning (Wales) Act 2015 sets out a series of legislative changes to deliver reform of the planning system in Wales to ensure that it is fair, resilient and enables development. Moreover, the Well-being of Future Generations (Wales) Act 2015 (WCFG Act) sets out a duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle. The Authority has also demonstrated that the Plan aligns with the identified well-being goals<sup>12</sup> and will as modified, contribute towards improving the economic, social, environmental and cultural well-being of Wales and, in this respect. As such I am satisfied that it complies with the overarching principle of the WCFG Act.

### *Conclusions*

- 2.9 Accordingly, the legal and regulatory preparation requirements have been satisfied.

## **3 The National Park Purpose and Duty and The Plan’s Strategy**

### *Vision and Objectives*

- 3.1 The Pembrokeshire Coast National Park (PCNP) stretches for some 420 kilometres along the coast of Pembrokeshire and covers an area of approximately 615 square kilometres. The National Park is characterised by historic towns and rural settlements set in a spectacular coastal landscape.
- 3.2 The Replacement LDP subject to **MAC 1**, which correctly amends the Plan to include an explanation of the Wales Spatial Plan (WSP), provides a clear and succinct description of the main social, economic and environmental characteristics of the PCNP and the national, regional and local policy framework that will influence the development of the National Park over the plan period.
- 3.3 A series of key issues and considerations which need to be addressed by the Replacement Plan have been identified in Chapter 2: Where we are now – National Park Portrait. The key issues include the need to: protect the special qualities of the National Park; meet the needs of local communities in areas

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<sup>11</sup> NPA0016 and Exam 139

<sup>12</sup> EXAM05

where the opportunities for growth are limited; manage and adapt to climate change; sustain and diversify the rural economy; manage, maintain and enhance the visitor economy; meet the need for affordable housing; continue to protect and enhance the range of community facilities; ensure that the existing town, district and smaller shopping Centres remain attractive, diverse and viable; and improve accessibility within the National Park, whilst recognising the need to reduce travel by motorised vehicles.

- 3.4 The LDP Vision, which has been derived from the PCNP Management Plan (2015-19) and refined to ensure that it relates to land use matters, encapsulates these key issues and provides a clear, locally distinct and aspirational picture of the place the National Park is intended to be at the end of the Plan period<sup>13</sup>.
- 3.5 In order to achieve this vision, the Replacement Plan sets out 21 objectives which are ordered under the following six priority areas: Special Qualities; Major Development, the Potential for Growth; Climate Change, Sustainable Design, Renewable Energy, Flooding; Visitor Economy, Employment and Rural Diversification; Affordable Housing and Housing Growth; and Community Facilities. To provide clarity about how these issues will be addressed by the Plan, **MAC 2 and 3**, amend the strategy to explain the strategic and policy responses necessary to assist in delivering the priority areas.
- 3.6 Overall, I am satisfied that the six priority areas and the objectives address the key issues that have been identified, expand on the Plan’s vision and provide a clear context for the LDP Strategy.

#### *National Park Purposes and Duty*

- 3.7 (Strategic) Policy 1 of the Replacement Plan provides an overarching framework for the management of development within the National Park. The policy requires that development: conserves and enhances natural beauty, wildlife and cultural heritage; is compatible with the public understanding and enjoyment of the special qualities of the National Park; and has regard to the need to foster the economic and social well-being of communities. The approach advocated by Policy 1 is appropriate, consistent with the requirements of PPW 10 and the Environment Act (1995) and will provide a positive basis on which to manage future development throughout the National Park.

#### *The Plan’s Strategy*

- 3.8 Building on the evidence prepared for the adopted LDP, a number of different strategy options were considered as part of the Replacement Plan process and refined through subsequent iterations of the Plan<sup>14</sup>. The overarching strategy for the Replacement Plan, subject to **MAC 4 and 5** which are necessary to provide greater clarity, is a rural strategy which seeks to conserve and enhance

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<sup>13</sup> NPA070

<sup>14</sup> NPA002 and 57

the natural beauty, wildlife and cultural heritage of the National Park whilst having regard to the need to foster the economic and social well-being of communities.

- 3.9 The strategy comprises three distinct elements: a policy framework for environmental protection which seeks to manage the impact of development on the special qualities of the National Park and positively assist in addressing the effects of climate change; a growth strategy which seeks to meet the need for new infrastructure, housing, tourism, employment and retail development; and a spatial strategy which embodies the requirements of the National Sustainable Placemaking Outcomes and distributes development in a proportionate and sustainable manner throughout the defined Centre hierarchy. This strategy is accompanied by a Key Diagram which, subject to **MAC 6** correctly requires its inclusion in the written statement, and clearly illustrates the distribution of development throughout the National Park and the transportation linkages between individual settlements and the wider region.
- 3.10 I note the concerns expressed about the clarity of MAC 5, and I agree that these can be ameliorated by the deletion of ‘will be encouraged’<sup>15</sup>. This is a minor editorial change which can be undertaken by the NPA.

#### *Environmental Protection*

- 3.11 The Policy framework for environmental protection is provided by a combination of (Strategic) Policies 1, 8 and 30 which seek: to conserve and enhance the special qualities of the National Park; and manage and mitigate against the effects of climate change by promoting development that is sustainable both in terms of its location and design. The approach to environmental protection in the strategy is consistent with the requirements of national policy and will provide a positive basis on which to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park and assist in fostering the economic and social well-being of local communities.

#### *Growth Strategy*

- 3.12 A key element of the growth strategy is to address the need for new affordable housing in the PCNP over the Plan period. However, analysis of the Welsh Government 2014-based Household Projections for the National Park suggest that there is no demographic need for new housing to be built in the PCNP over the Plan period. The absence of any new housing allocations in the Replacement Plan, would inevitably mean that no meaningful contribution to the supply of new affordable housing would be delivered through the Replacement Plan. To address this issue the strategy of the Plan, correctly, proposes to intervene and allocates land to deliver new market and affordable housing in PCNP. The evidential basis and robustness of this policy intervention is considered further in Chapters 8 and 9 of this report.
- 3.13 The growth component of the strategy outlines a modest but nevertheless significant approach to the provision of new development within the National

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<sup>15</sup> The change relates to the last sentence of the second new paragraph inserted by MAC5.

Park. The growth strategy is expressed through (Strategic) Policies 21, 39, 44, 47, 49, 53 and 54 which collectively provide a framework for securing: 960 new dwellings; 362 new affordable homes (**MAC 70**); and 1270 (net) square metres of new retail floorspace (**MAC 91**); the retention of existing and provision of new tourism and employment related development; and the provision of new and improved community facilities and infrastructure. The level of growth identified in the Replacement LDP is based on the findings of evidence produced specifically to inform the development of the Plan<sup>16</sup> and is consistent with the approach advocated in PPW.

### *Spatial Strategy*

- 3.14 The spatial components of the strategy are expressed under (Strategic) Policies 2, 3, 4, 5, 6 and 7 which define the centre hierarchy, distribute growth and seek to safeguard the countryside from inappropriate development.
- 3.15 The Centre Hierarchy is derived from the Wales Spatial Plan (WSP) and has been refined and updated to reflect local circumstances. The hierarchy identifies those centres which are considered to be sustainable and therefore capable of accommodating growth over the Plan period. Based on the assessment set out in the amended ‘Scale and Location of Growth’ Background Paper<sup>17</sup> a four-tier hierarchy has been identified. The tiers are, subject to **MAC 5 and 7, 8, 9, 10, 11 and 12** which correctly amends the ranking of the hierarchy to reflect local circumstances: Tier 1 - Local Service and Tourism Centres; Tier 2 - Local Centres; Tier 3 - Rural Centres; and Tier 4 - Countryside.
- 3.16 The Centre Hierarchy was defined following an assessment of the main socio-economic characteristics of each centre<sup>18</sup> and refined through the SA<sup>19</sup> and consultation process. The assessment process considered a range of factors including the existing population of each centre, the availability of community/commercial facilities and services, accessibility by public transport, water supply and sewerage capacity. The Centres with the greatest number of facilities and services were placed at the top of the hierarchy.
- 3.17 Provision for new housing and retail development is distributed across the National Park depending on the centres’ position in the hierarchy and the availability of land that can be developed for housing during the Plan period. The apportionment process focuses new development in the top three tiers of the hierarchy and in doing so, ensures that the highest levels of growth occur in the most sustainable locations.
- 3.18 In my view the approach to defining the centre hierarchy was based on comprehensive and robust evidence and has resulted in the logical and realistic categorisation of Centres and distribution of growth across the National Park.

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<sup>16</sup> NPA042, NPA043, NPA044, NPA061 and REG01

<sup>17</sup> NPA036

<sup>18</sup> NPA057

<sup>19</sup> NPA008 and NPA010

- 3.19 Tenby has the largest population, some 4,517 residents, and the highest number of shops (101 units), 15 category 1 or 2<sup>20</sup> facilities and a frequent bus service and has correctly been identified as the only Tier 1 centre in the National Park. The policy framework for the centre is provided by (Strategic) Policy 2, which subject to **MAC 8**, provides the mechanism for managing new social and economic development in the centre.
- 3.20 It has been suggested by representors that as the Tier 1 Centre, Tenby should accommodate a significant proportion of the new housing development proposed by the Replacement Plan. However, as the findings of the Candidate Site process demonstrate, there are currently no suitable, unconstrained and deliverable sites available within the centre. Instead the Replacement Plan places reliance for the provision of new market and affordable housing in Tenby on completed sites and the development of windfall sites. As discussed later in my report, it is envisaged that 186 new dwellings will be delivered in this manner in the centre over the Plan period<sup>21</sup>. This quantum of development exceeds that provided, individually, in the Tier 2 and 3 centres. Whilst the allocation of a site would be desirable, I am content that the approach outlined in the Replacement Plan will ensure that a suitable supply of new affordable and market housing will be available in Tenby for the period up to 2031<sup>22</sup>. In addition, provision will be made for 707 sqm of new retail floorspace in the centre over the Plan period. The combination of these factors will assist in ensuring that a centre provides the level of growth commensurate with its position in the hierarchy.
- 3.21 Tier 2 of the hierarchy includes the ‘Local Centres’ of Newport, Saundersfoot and St Davids. These centres have populations of between 860 and 2,473 residents, have established commercial centres which include 88 shops<sup>23</sup>, provide 40 category 1 and 2 services and access to frequent to public transport services<sup>24</sup>. The framework for these centres is provided by (Strategic) Policies 3, 4 and 5 which, subject to **MAC 9, 10 and 11** which are necessary to improve clarity, seek to manage the provision of new housing, small-scale employment opportunities, shopping and commercial facilities, improved traffic management and to protect and enhance the special qualities of the centres. These centres are, jointly, intended to accommodate 285 new houses on allocated/permitted sites and will provide for 563 sqm of new retail floorspace. Although more limited in terms of size and facilities than the ‘Service and Tourism Centre’, Local Centres offer a good range of facilities and services for their own and surrounding communities. It is therefore appropriate that these centres have been identified as capable of accommodating further growth of the scale intended.
- 3.22 Forty centres are identified as being ‘Rural Centres’ and are in the third Tier of the hierarchy. Of these 40 centres, only 28 are located wholly within the Park. These Centres have populations of between 17 and 847 residents and provide

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<sup>20</sup> NPA036

<sup>21</sup> HS6/AP1

<sup>22</sup> NPA017, NPA020 and NPA039

<sup>23</sup> REG04

<sup>24</sup> NPA036

between them 42 shops, 182 category 1 and 2 services and have good to limited access to public transport. The management of growth in these centres will be provided by (Strategic) Policy 6 which supports the development of 218 new dwellings on 9 allocated/permitted sites and, subject to **MAC 12**, which correctly provides certainty about the application of the policy, the provision of new market and affordable housing and small-scale commercial development on windfall sites. Although more limited in terms of size and facilities than Tier 1 and 2 centres, Tier 3 centres nevertheless provide a range of facilities and act as important service centres for their own, and surrounding communities. As such, it is appropriate that these centres have been identified as suitable locations for further growth.

- 3.23 The lowest tier in the hierarchy is ‘Countryside’ and includes all the small villages and hamlets that have not already been identified in higher tiers of the hierarchy. In view of the small scale of these settlements, (Strategic) Policy 7 does not specifically allocate sites but, correctly, provides a policy framework which seeks to ensure that proposals for new housing and employment related development in these centres comply with the requirements of PPW. A number of changes to the requirements of (Strategic) Policy 7 arise as a result of the inclusion of **MAC 13, 14, 15, 16** and **17**, the nature and reason for these changes are discussed in the Housing Provision and Distribution chapter of this report.
- 3.24 I consider that the Plan’s strategy provides a positive framework which seeks to meet the defined need for new housing and commercial development, whilst continuing to conserve and enhance the special qualities of the National Park.

*Main / Principal Residence in Newport*

- 3.25 PPW 10<sup>25</sup> requires that planning authorities, in partnership with the community, develop policies to meet the challenges and particular circumstances evident in their areas. Where these policies seek to diverge from national policies in order to meet specific local housing needs for market housing, which normally would have no occupancy restriction, planning authorities must provide clear and robust evidence to support the approach taken.
- 3.26 During the course of the examination it was explained by representatives of a local environmental group that, because of its natural beauty and coastal amenity, Newport had become an increasingly popular place for investors to buy a second home or holiday let. Whilst it was acknowledged that this has its benefits, particularly for the visitor economy, it was suggested that the increase in the number of second homes and holiday lets in the centre was having a detrimental effect on the socio-economic well-being and cohesion of the community. In support of this assertion written and oral evidence<sup>26</sup> was presented by the representors which indicated:

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<sup>25</sup> PPW 10, paragraph 4.2.9

<sup>26</sup> Written Statement from NAEG for Hearing Sessions 1 and 9 and in response to HS9/AP1

- That the proportion of the population aged between 16-49, was substantially lower than the Welsh average; whilst the proportion of the population that is over retirement age was substantially higher;
- The average price for a 2 bedroomed house in Newport was approximately £238,000 which was nearly 50% greater than the UK average;
- The main stay of the employment market in the National Park is centred around the visitor economy and that much of the work in that sector is seasonal/part-time and low paid with the average wages for Wales being circa £18,000;
- That 272 of the household spaces in Newport recorded in the 2001 Census had ‘no usual resident’ because they were second homes/holiday lets, and that by 2011 the number of household spaces identified as having ‘no usual resident’ had risen to 344; and
- planning policies which seek to address broadly similar issues have been introduced in plans in England and Wales, specifically a Principal Residence (PR) policy in the St Ives Neighbourhood Plan and Local Connections (LC) policies in the Swansea and Anglesey & Gwynedd LDPs.

3.27 To address these concerns, it is suggested that Policy 3 - Newport Local Centre should be amended to include a new criterion which restricts the occupancy of all new housing in the centre to occupants who would make the dwelling their main or principal place of residence. To ensure clarity about requirements, it is further suggested that the reasoned justification of the policy is expanded to explain that: ‘*Main or Principal Residence*’ is defined as being a dwelling which is the residents’ sole or main place of residence; and, it can be demonstrated that, the dwelling is occupied by at least one resident for a minimum 75% of their time, when not working away from home.

3.28 In response to the issues raised, the NPA has prepared a Background Paper<sup>27</sup> which considers the need for a PR and /or LC policy in the National Park<sup>28</sup>. For the purposes of the paper a PR was defined as a dwelling occupied as the primary (principal) residence of those persons entitled to occupy it and a LC dwellings as properties occupied only by individuals who have a specific connection with the ward or area in which the property is located<sup>29</sup>. The paper explains the requirements of national policy, the evidential requirements, considers the experience of implementing similar policies both locally and nationally, and assesses the potential impact of the approach. In doing so, the paper identifies 15 indicators<sup>30</sup>, that are considered to be key determinants in assessing the need for a principal residence and/or local connections policies. The threshold for each of the indicators is set out in the Background Paper.

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<sup>27</sup> EXAM 111

<sup>28</sup> EXAM 111, Table 1 Summary of Principal Residence / Local Connections Policies defines a PR is dwelling occupied as the primary (principal) residence of those persons entitled to occupy it and an LC dwellings are properties occupied only by individuals who have a specific connection with the ward or area in which the property is located

<sup>29</sup> EXAM 111, Table 1 Summary of Principal Residence / Local Connections Policies

<sup>30</sup> The indicators and thresholds are drawn from the evidence used to designate and monitor PR and LC policies in the St Ives Neighbourhood Plan, Gwynedd & Anglesey LDP and Swansea LDP.

- 3.29 Although it should be noted that all of the indicators are relevant, the key indicators for determining the need for a PR policy include those in relation to housing transactions, median house prices / median wage, the number of dwellings with ‘no usual resident’, dwellings in high Council Tax brackets, the number of households paying Second Home Council Tax and the provision of Community Facilities. For LC policies the key indicators include those relating to housing transactions, median house prices / median wage, the provision and need for affordable housing, the number of bedrooms in dwellings, dwellings in high Council Tax brackets, the number of households paying Second Home Council Tax and the provision of Community Facilities.
- 3.30 An assessment was then undertaken to determine the significance of each of the 15 indicators in 56 communities located, wholly or partially, within the National Park. The findings of the assessment indicate that: two thirds of the communities had reached the threshold of the indicators relating to affordable housing; less than a third of centres reached the ‘median house price / median wages’, ‘no usual resident’ or ‘higher Council tax’ thresholds; and only a few centres had reached the ‘Second Homes Council Tax’ threshold.
- 3.31 Of the 56 communities assessed only 4, Amroth, Burton, Dale and Newport, had reached the threshold of 4 or more indicators. In the case of Newport, the assessment found that the Centre met the threshold in respect of the ‘median house prices/median wages’, ‘no usual resident’, ‘the number of dwellings in high Council Tax brackets’ and the payment of ‘Second Home Council Tax’. But that: there was no significant pattern of decline in respect of the number of pupils attending the schools serving the Centre; the vacancy rate within the defined shopping centre was below the average for the National Park and substantially below the national average; and that the provision of community facilities in Newport remained largely unchanged.
- 3.32 In terms of the wider impact, the Background Paper found that a PR or LC policy was likely to:
- result in a reduction in demand for, and provision of, new build houses and instead, place an increased demand on existing properties; and
  - reduce the baseline land values of potential housing development sites by between 15 and 30% and in doing so, render the development of market and affordable housing in all parts of the National Park, except the Tenby sub-market area, unviable.
- 3.33 Whilst little explicit mention is made of Newport, it is clear that the wider issues identified in the Background Paper are likely to be as relevant to the Centre as other parts of the National Park.
- 3.34 Overall, the Background Paper concluded that amending the replacement LDP to include a PR and/or LC policy was not appropriate. The NPA does however, recognise that the concerns expressed by representors during the examination echo those of many coastal communities, and therefore, to ensure that a mechanism is available to monitor the degree to which this issue increases over the Plan period; and the impact it has on the well-being of the communities of the PCNP, proposes to amend the SA. MAC 99 and 100 will, correctly, amend the monitoring framework in the SA to include an explanation of the issue and to provide additional contextual indicators to monitor: the number of



households with no usual resident; homes on the Council Tax database subject to the second home premium; the provision of community facilities / services; and schools and school occupancy levels. This approach will ensure that any adverse effects arising from policies in the Replacement Plan are within acceptable limits, or where they are not, assist in identifying the remedial action that maybe needed in future iterations of the LDP. Although changes to the SA are not matters on which I can make binding recommendations, I am nevertheless supportive of the amendments proposed by MAC 99 and 100.

- 3.35 I am content that there is no compelling evidence for the inclusion of a PR or a LC policy within the Replacement Plan, either for Newport or the National Park as a whole. Moreover, I consider that the imposition of such a policy is likely to have an adverse effect on the delivery of market and affordable housing, and in doing so, would undermine the Plan’s strategy. In the case of the centres, in which the study found there is a need for affordable housing, I am content that the approach taken in Strategic Policy 49 to the provision of affordable housing will assist in addressing this issue and ensuring the appropriate distribution of social and intermediate housing across the National Park.

#### *Proposals Map*

- 3.36 The linear form and configuration of the National Park, makes preparing a proposals map for the Plan area that can be easily read a challenge. In order to ensure the area is mapped appropriately the NPA has correctly elected to prepare a separate A3 document which contains 10 no. large scale plans covering the whole of the Plan area and 56 no. inset maps showing individual centres.

#### *Supplementary Planning Guidance*

- 3.37 The submitted Plan sets out a programme for the production of a range of Supplementary Planning Guidance (SPG) documents. The SPGs will cover topics such as affordable housing, biodiversity, archaeology, planning obligations, sustainable design, renewable energy, tourist accommodation, place plans, landscape / seascape character, Conservation Areas, shopfront design, minerals, recreation and agricultural buildings. **MAC 96** correctly proposes to expand the submitted list of guidance to include the preparation of a Place Plan SPG and make clear that the other guidance listed would be prepared over a 6 to 24-month period following adoption of the Plan.

#### *Conclusions*

- 3.38 Subject to the recommended changes, I conclude that the vision, objectives and overall development strategy are consistent with national planning policy and the WCFG Act and is otherwise soundly based.

## 4 Special Qualities of the National Park

- 4.1 The Special Qualities Background Paper<sup>31</sup> defines the factors which make the PCNP unique, both individually and collectively, as its: coastal splendour; diverse geology; diversity of landscape; distinctive settlement character; rich archaeology; cultural heritage; richness of habitats and biodiversity; islands; accessibility; space to breathe; remoteness, tranquillity and wildness; and diversity. The definition is supported by the National Park Management Plan<sup>32</sup>.
- 4.3 In order to ensure that these Special Qualities are conserved and enhanced (Strategic) Policy 8 provides a framework which prioritises the need to protect: the sense of remoteness and tranquillity; the character of towns and villages; the pattern and diversity of the landscape; the historic environment; the National Park’s ecosystems; geological resources; species and habitats; the Welsh language; the undeveloped coast; and green infrastructure. The policy is supported by Policies 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 30, 34 and 39 which provide a mechanism for assessing proposals in relation to light pollution, nature conservation, the Welsh language, historic environment, landscape, open space, Green Wedges, shore based facilities and harbours, sustainable design and renewable and low carbon energy.

### *Nature Conservation*

- 4.4 The National Park Management Plan (2015-2019)<sup>33</sup> indicates that PCNP contains a number of sites that have been designated for being of European or national ecological or geomorphological importance. This includes Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR) and a Marine Conservation Zone. At regional and local level there are a number of different site designations within the Park, including a local nature reserve (LNR) and Regionally Important Geodiversity Sites (RIGs).
- 4.5 The policy framework for biodiversity, in the submitted Plan is provided by a combination of Policies 10, 11, 12 and 13. Policies 10 and 11 provide the framework for managing the impact of new development on sites and species of European importance, and nationally protected sites and are, subject to **MAC 20** and **21**, sound.
- 4.6 Policies 12 and 13, which have broadly similar requirements, seek to manage the impact of development on a range of non-statutory designations<sup>34</sup>, species and habitats. In doing so, the policies make it clear that where development proposals would have an unacceptable adverse effect on sites and species they will not be permitted. These requirements are however, at variance with those of PPW 10<sup>35</sup> which requires that LPAs adopt a ‘stepwise approach’ to maintaining and enhancing ecological networks. In order to ensure conformity

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<sup>31</sup> NPA069

<sup>32</sup> LOC04

<sup>33</sup> LOC08

<sup>34</sup> LNR, SINC and RIGs

<sup>35</sup> PPW 10, paragraph 6.4.21

with the requirements of PPW and to reduce duplication, **MAC 22, 23 and 25** merge Policies 12 and 13 and, correctly, establishes a framework which seeks to avoid, minimise, mitigate and finally compensate for, the potential impact of development on non-statutory designations, species and habitats. In addition, to provide certainty about the location of LNRs and RIGs, **MAC 24, MMAP 1 and 2**, correctly, propose to amend the reasoned justification of the Plan and the Proposals Map to annotate these sites.

- 4.7 Subject to the aforementioned changes, I am content that the policy framework provides a clear, consistent and comprehensive framework for managing the impact of new development on nature conservation interests and is consistent with the requirements of PPW.

#### *Welsh Language*

- 4.8 The Planning (Wales) Act makes it mandatory for all LPAs to consider the effect of their LDP on the Welsh language; whilst the WCFG Act sets the goal of achieving a Wales with a vibrant culture and thriving Welsh language. This legislation is supported by the provisions of PPW and Technical Advice Note 20 – Planning and the Welsh Language (TAN 20). The policy framework set nationally, requires all LPAs to include within their development plans a statement explaining how they have taken into account the needs and interests of the Welsh language. In the case of the Replacement Plan, this is achieved by the inclusion of Policy 14 which is supported by evidence presented in the Welsh Language Background Paper<sup>36</sup>.
- 4.9 The Background Paper explains that the findings of the 2011 Census show that an average of 19.2% of residents within the PCNP area speak Welsh. This represents an overall decline in the proportion of people able to speak Welsh in the National Park of 4.7% since the 2001 Census. At Community Council level the picture is broadly similar with 44 of the 51 Town and Community Council areas showing a decrease in the number of Welsh Speakers. This decline is particularly prevalent in the north of the National Park. Based on the average percentage, the reasoned justification of Policy 14 identifies 18 towns and community council areas within the National Park as being Welsh Language - Sensitive Areas (WLSA). These areas are listed in the policy’s reasoned justification and annotated on the proposals map.
- 4.10 Policy 14 requires that any development within the WLSA which is likely to have a significant effect is subject to a language impact assessment and, where appropriate, identifies measures to protect, promote and enhance the language. **MAC 26 and 27** correctly amend the policy to provide a definition of the scale of development which is likely to have a significant effect on WLSA and the type of measures necessary to mitigate these effects.
- 4.11 During the course of the examination, it was suggested that the towns and community councils within the WLSA should be listed within the policy. However, I am content that the inclusion of these areas in the reasoned

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<sup>36</sup> NPA072

justification of Policy 14 and the identification of the WLSA on the proposals map is sufficient to provide certainty about the geographical application of the policy and that no further amendments are necessary to ensure the soundness of the Plan.

- 4.12 Based on the evidence presented I am content that the policy approach is consistent with the requirements of the Planning (Wales) Act, WCFG Act, PPW and TAN 20.

#### *Heritage*

- 4.13 The combination of Policies 8, 15 and 16 provide the framework for the management of the historic environment in the National Park. The policies seek to: protect and where possible enhance the historic environment; manage the impact of new development on buildings of local importance within the National Park; and ensure that traditional features in the landscape and seascape are either preserved or incorporated into development.
- 4.14 The Historic Environment (Wales) Act 2016<sup>37</sup> and PPW outline a requirement for the compilation, adoption and maintenance of an up-to-date and publicly accessible Historic Environment Record (HER), which provides details of all the historic assets in individual local planning authority areas. As part of the HER, local planning authorities can include details of buildings, such as those identified in Policy 15, which are not subject to any statutory protection but are historic assets of special local interest that make an important contribution to the character and appearance of the area. Guidance in relation to the designation of local heritage assets is contained in ‘*Managing Lists of Historic Assets of Special Local Interest in Wales*’ (2017). The document sets out the process of preparing a list of historic assets of special local interest and makes clear that only once a list has been formally adopted, can it be used as evidence to support the inclusion of policies in development plans.
- 4.15 In response to HS2/AP6, the NPA confirmed that the process of preparing the element of the HER that related to Historic Assets of Special Local Interest had yet to commence, and, as such, no list had been formally adopted for the National Park<sup>38</sup>. In the absence of an adopted list and in recognition that Policy 15 is not supported by sound evidence, the NPA proposes, through **MAC 28**, to delete Policy 15 and to place its reliance on the requirements of Policies 8 and 16 to manage the impact of development. I am content that, in the interests of soundness, **MAC 28** is necessary, and that the framework provided by Policies 8 and 16 is robust enough to manage the impact of new development on the built, natural and historic environment and complies with the requirements of PPW.

#### *Open Space and Green Wedges*

- 4.16 The framework for designating and managing Open Spaces and Green Wedges in the National Park is provided by Policy 17. The approach in the policy

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<sup>37</sup> The Historic Environment Act (Wales) 2016, Sections 35 and 36

<sup>38</sup> HS2/AP6

conflates two distinctly different areas of land use, and in doing so, does not provide a sufficiently detailed or robust framework for either. In order to ameliorate this, **MAC 29, 30, 31, 32, 33, 34 and 35**, are necessary to revise Policy 17 to address matters in relation to open space and to create a new, separate, Green Wedges policy.

- 4.17 Revised Policy 17, correctly, seeks to protect designated areas of open space in centres from inappropriate development and, where necessary, secure the provision of new and improved open space. The evidential basis for the policy is provided by the Open Space Assessment<sup>39</sup>, which builds on work undertaken for the original LDP, and provides: a detailed review of the provision of different open space typologies<sup>40</sup> across the National Park; identifies areas of open space within or adjacent to centre boundaries which provide formal and informal recreational facilities and/or contribute to the character of the area; and outlines the need for new and improved open space provision. Of the 300 areas of open space assessed, 169 sites have been identified by Policy 17 as open space which requires protection from inappropriate development<sup>41</sup>. These sites are identified on the Proposals Maps.
- 4.18 During the course of the examination concerns were expressed that the boundaries of the open space at ‘The Glebe’, Tenby had been inaccurately annotated on the Proposals Map. It was further suggested that the approach to the assessment of 3 other sites in Tenby, at Rosemount Gardens, Allen’s View and the Cemetery, were incorrect and that the sites should be designated as open space. Following a review of these sites the NPA are correctly proposing, through **MMAP 3** to amend the existing designation at ‘The Glebe’ to include additional land at the entrance to the estate, and to designate Rosemount Gardens and the Cemetery, as open space. The land at Allen’s View is not proposed for inclusion in the Replacement Plan because it is located some distance outside the centre boundary of Tenby and in an area where development is already strictly controlled<sup>42</sup>.
- 4.19 Based on the submitted evidence and subject to the **MAC 29, 30, 31, 32 and 33** and **MMAP 3**, I am content that the approach to designating and managing existing and future open space is sound.
- 4.20 In terms of Green Wedges, the new policy proposed the designation of a series of Wedges throughout the National Park which are intended to assist in avoiding coalescence, protect the setting of Centres and safeguard the countryside from inappropriate development. The evidence base for these designations is contained in the Green Wedge Background Paper<sup>43</sup>. The paper outlines a 3-stage process which: identified 94 existing<sup>44</sup> or potential Green Wedges; considered whether alternative policy mechanisms were available to fulfil the same objective as Green Wedges; and if not, if each of the sites met the five purposes of Green Wedges contained in PPW 10.

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<sup>39</sup> NPA059

<sup>40</sup> NPA059, Table 2

<sup>41</sup> Exam 140

<sup>42</sup> HS2/AP8

<sup>43</sup> NPA063 and NPA064

<sup>44</sup> Green Wedges allocated in the Adopted PCNP LDP (2010)

4.21 The findings of the evaluation concluded that 41 of the 94 sites met the five purposes and that no suitable alternative policy mechanisms in respect of these sites exists. As a consequence, these sites have been identified in the policy and are annotated on the Proposals Map. Although I note that the policy identifies a considerable number of individual Green Wedges, I am content that the evidence presented demonstrates the need for each of the designated sites and that there is no scope for the amalgamation of wedges without, for the most part, the inclusion of land which it is not necessary to protect. Subject to **MAC 34** and **35**, I am content that the policy framework and approach to the designation of Green Wedges is based on robust and comprehensive evidence and accords with the requirements of national planning policy.

#### *Other Policies*

4.22 Policy 9 seeks to manage the level of light emitted from developments, in order to reduce its impact on the character of the area, local residents, vehicle users, pedestrians, biodiversity and the visibility of the night sky. The policy, subject to **MAC 18** and **19** which are necessary to improve clarity, provides an appropriate basis to assess development proposals and is consistent with the requirements of PPW. Whilst I note the concerns expressed in respect of MAC 19, I am content that the wording of the change is clear and will ensure the requirement of Policy 9 are applied appropriately.

4.23 The framework for the management of proposals for shore-based facilities and development in the harbour areas of Porthgain, Saundersfoot, Solva and Tenby is provided by Policies 18 and 19. Subject to **MAC 36** and **37**, which are necessary to clarify that any possible impacts arising from development on Natura 2000 sites will be considered in accordance with Policy 10, the policies are sound.

#### *Conclusions*

4.24 Having had regard to the evidence presented I am satisfied that the Policy framework contained within the Plan, subject to the MACs, for safeguarding the Special Qualities of the National Park is clear, based on robust and credible evidence and consistent with the requirements of European and national policy.

## **5 Major Development, the Potential for Growth**

### *Major Development*

5.1 Major Development, the Potential for Growth section provides the context for large scale development in the National Park. This includes the development undertaken in accordance with the provisions for Nationally Significant Infrastructure Projects, Developments of National Significance in Wales, proposals for development on Ministry of Defence land and the provision of hazardous installations.

5.2 In the context of the National Park, Policy 21, subject to **MAC 38** which is necessary to avoid duplication between strategic and non-strategic policies in the Plan, outlines the scale and nature of growth required over the plan period. This includes the provision of shore-based facilities within the developed area of

the coast; local waste management facilities which predominantly serve the National Park; the provision of small to medium scale renewable energy schemes; and, in exceptional circumstances, mineral related development. The approach to major development in the Replacement Plan will protect the landscape and scenic beauty of the National Park and is consistent with the requirements of PPW.

### *Minerals*

- 5.3 National planning policy relating to minerals is set out in PPW<sup>45</sup> and is supplemented by Minerals Technical Advice Note 1: Aggregates (2004) (MTAN1) and Minerals Technical Advice Note 2: Coal (2009) (MTAN 2). MTAN1, makes clear that the extraction of minerals in National Parks will only be permitted in exceptional circumstances, that Regional Aggregates Working Parties (RAWPs) should take into account the need to protect these areas from extraction and that the agreement of other authorities to meet the contribution that the National Parks are unable to meet should be discussed and recorded in the Regional Technical Statement (RTS). In addition, PPW makes clear that there is no requirement for an aggregate landbank to be maintained in National Parks<sup>46</sup>.
- 5.4 The RTS for North Wales and South Wales, 1st Review (2014)<sup>47</sup> sets out how aggregate demand will be met in the South Wales Region for the period 2011 to 2033. The apportionment figures contained in the RTS 1st Review require that the South West Wales Region, which comprises Pembrokeshire Coast National Park planning authority area, Pembrokeshire County Council planning authority area, Carmarthenshire County Council and Ceredigion County Council, provide 7.26 million tonnes (mt) of land-based sand and gravel. The 1st Review indicates that as of the 31st December 2010, the South West Wales Region had a land bank of 4.32 mt of land-based sand and gravel, leaving a shortfall of some 2.94 mt.
- 5.5 The Minerals Statement of Common Ground<sup>48</sup>, which has been signed by all constituent authorities, explains that in order to meet the deficit additional provision has been made through the inclusion of: sites with planning permission at Trefigin Quarry, PCNP and Crug yr Eryr Quarry, Ceredigion; the allocation of two sites, at Penparc, Cardigan and Pant, in the Adopted Ceredigion LDP (2013); and the identification of a dormant site, at Glantowy, Llandovery, Carmarthenshire. In total the additional provision amounted to 3.253 mt bringing the total supply in the Region up to 7.57 mt. In recognition of the importance of the National Park and to ensure resilience in the future supply, the authorities have agreed to continue to look for new opportunities for provision outside of the National Park. With regard to aggregates, the RTS 1st Review indicates that there is a surplus of some 14 mt of crushed rock in Pembrokeshire as a whole and that there is no requirement for further allocations during the RTS plan period. I am therefore satisfied that the land

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<sup>45</sup> PPW, sub-section 5.14

<sup>46</sup> PPW 10, paragraph 5.14.15

<sup>47</sup> REG05

<sup>48</sup> NPA025

bank requirements for the region have been met and that the Plan accords with national planning policy and the RTS 1st Review (2014).

- 5.6 The framework for safeguarding worked and unworked mineral resources and managing development within mineral buffer zones in the National Park is provided by Policies 22 and 23. Policy 22 seeks to safeguard sand and gravel, limestone, sandstone, igneous rock and slate resources from being sterilised by development. In doing so, the policy recognises that, where there is no suitable alternative location or there is an overriding need for the development, the prior extraction of safeguarded minerals of current or likely economic importance may be necessary. Policy 23 makes clear that development in mineral working buffer zones will only be permitted where the resource would not be sterilised, and the operations of the site would not have an unacceptable effect on the proposed development. In addition, in order to provide clarity about the future of unworked mineral resources, Policy 27 explains that on sites where the winning or working of minerals or the depositing of mineral waste has permanently ceased, consideration will be given to serving a Prohibition Order.
- 5.7 In accordance with PPW, Policy 25 provides a set of criteria against which proposals for future mineral extractions are to be assessed. The policy makes clear that mineral extraction in the National Park will only be permitted: where there is a proven need and exceptional circumstances can be demonstrated; the quarrying is closely located to the development; there are clear environmental benefits from meeting the supply from the proposed sources; the scale of the development is appropriate for the locality; and there is provision for a beneficial after-use. **MAC 40** and **41** amends the reasoned justification of the policy to provide a definition of ‘closely related’, a revision which is necessary to ensure the clarity and effective application of the policy. To assist in managing the supply of locally derived minerals, Policy 24, makes provision for temporary planning permission to be granted for borrow pits. The pits will be permitted where the supply is required for a specific short-term project, it is appropriate in environmental and locational terms, provision is made for appropriate after-use of the site and, subject to **MAC 39** which is necessary to improve the clarity of the policy, any potential effects on Natura 2000 sites are considered in accordance with Policy 10.
- 5.8 Subject to the MACs, I am content that the framework for managing minerals related development within the National Park is robust and accords with the requirements of national planning policy.

#### *Waste*

- 5.9 PPW 10<sup>49</sup> requires development plans to: demonstrate how national waste policy, in particular the Collections, Infrastructure and Markets Sector Plan (CIMSP), waste planning monitoring reports and any other relevant priorities have been taken into account; and to support the provision and suitable location of a wide ranging and diverse waste infrastructure.

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<sup>49</sup> PPW 10, paragraph 5.13.8



- 5.10 The CIM Sector Plan sets out the ‘best estimate’ of capacity requirement for the recovery and disposal of residual waste in each of the 3 regions in Wales. The CIM Sector Plan outlines a requirement for additional waste management facilities capable of handling between 34,000 to 327,000 tonnes of waste in the South West Wales Region by 2025<sup>50</sup>. However, in recognition of the special qualities of the National Park, the South West Wales Regional Waste Plan 1<sup>st</sup> Review makes clear that the PCNP is not a suitable location for the provision of either in-building or open-air regional waste facilities<sup>51</sup>. Accordingly, no provision for either type of facility is made in the Replacement Plan.
- 5.11 The framework for the management of waste within the National Park is provided by Policies 28 and 29 of the Replacement Plan, which combined provide the mechanism for the management of local and green waste facilities. Policy 29 outlines criteria which seek to protect residential and visual amenity, the capacity of the highway network, landscape, water resources and to ensure that the compost produced has added value. To provide certainty about the requirements of the policy, **MAC 42** correctly amends the reasoned justification of the policy to explain that the material produced must have clear domestic and commercial applications and to clarify the nature of the potential impact on surface or groundwaters. I note the concerns expressed about the clarity of **MAC 42**, and I agree that these can be ameliorated by amending the reference in paragraph 4.156 from ‘water resources’ to ‘water quality’. This is a minor editorial change which can be undertaken by the NPA.

### *Conclusions*

- 5.12 On the basis of the evidence presented, I am satisfied that the policies and proposals in relation to major development, minerals and waste are based on robust and credible evidence and, subject to MACs, are consistent with national policy.

## **6 Climate Change, Sustainable Design, Renewable Energy and Flooding**

- 6.1. The key Planning Principles set out in PPW<sup>52</sup> recognises that the planning system has a vital part to play in making the best use of resources and ensuring that development is resilient to climate change, assists in decarbonising society and supports the creation of a circular economy, for the benefit of both the built and natural environment. In doing so, the planning system at both national and local level is required to make an important contribution towards the achievement of the National Sustainable Placemaking Outcomes<sup>53</sup> and the goals set out in the WCFG Act.

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<sup>50</sup> CIM Sector Plan, (2012)

<sup>51</sup> NPA071

<sup>52</sup> PPW 10, Figure 3

<sup>53</sup> PPW 10, Figure 4

- 6.2 The Replacement Plan provides a framework at local level which seeks to address the issue of climate change through: minimising the need to travel by ensuring that new development is located within or close to existing Centres (Policies 2, 3, 4, 5, 6 and 7); promoting sustainable design (Policy 30); restricting the development of hazardous installations which are large generators of CO<sub>2</sub> in the Park (Policy 20); management of flooding and coastal inundation (Policies 33, 35, 36, 37 and 38); and supporting the efficient use and generation of renewable and low carbon energy (Policies 30 and 34). The evidential basis for the policy approach is provided by the Climate Change Background Paper<sup>54</sup>, the Carbon Sources Background Paper<sup>55</sup>, the Coastal Change Background Paper<sup>56</sup> and the Renewable Energy Assessment<sup>57</sup>.

#### *Sustainable Design*

- 6.3 (Strategic) Policy 30 of the submitted Plan seeks to ensure that all forms of development within the National Park are sustainable and have demonstrably, had regard to the need to provide an integrated approach to both the design and construction of a scheme. In doing so, proposals are required to: have regard to the context and location of the site; address the need for carbon reduction; make efficient use of water resources; include provision for energy efficiency measures and the use of renewable or low carbon energy technologies (**MAC 43** and **44**); minimise waste and promote/facilitate recycling both in the construction and operational phases of a development; and incorporate robust measures to deal with the effects of flooding, coastal risk and other pressures arising from climate change. The policy is supported by Policy 31 which, correctly amended by **MAC 45** and **46**, provides the mechanism for managing the impact of development on the residential, working, recreational and visual amenity of the National Park.
- 6.4 The combination of these policies provides a constructive framework which will ensure that all new development respects the special qualities of the National Park, meets the requirements of the National Sustainable Placemaking Outcomes and contributes positively towards the achievement of the well-being goals.

#### *Renewable and Low Carbon Energy*

- 6.5 National planning policy<sup>58</sup> requires that Planning Authorities provide a land use framework which supports the provision of all forms of renewable and low carbon energy development. In doing so, authorities are required to ensure that their area’s full potential for renewable and low carbon energy generation is maximised and renewable energy targets achieved.

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<sup>54</sup> NPA032

<sup>55</sup> NPA031

<sup>56</sup> NPA033

<sup>57</sup> NPA067

<sup>58</sup> PPW10, sub-section 5.9, TAN 8 – Planning for Renewable Energy (2008) and Planning for Renewable and Low Carbon Energy – A Toolkit for Planners (September 2015).

- 6.6 The renewable and low carbon energy assessment for PCNPA<sup>59</sup> (REA) was produced in 2008 and updated in 2016. The findings of the REA indicate that Pembrokeshire as a whole, has some 3,453 low carbon energy installations which generate 145,492 MWh of renewable electricity and 30,116 MWh of renewable heat per annum. The assessment notes that, when the special qualities of the National Park and the availability of subsidies are taken into account, there is little opportunity for large scale wind or solar PV development, but that opportunities do exist for the generation of renewable electricity and heat from a range of sources. These include biomass, hydro, anaerobic digestion, heat pumps, very small and small field scale solar PV arrays and standalone micro, small and medium wind turbines. The study concluded that harnessing this potential resource, could assist in generating 38.9 GWh of renewable electricity and 9.8 GWh of renewable heat by the end of the Plan period. The assessment of the potential for wind or solar PV development accords with the requirements of PPW<sup>60</sup> which makes clear that large scale schemes will generally not be permitted in nationally designated areas. Overall, I am content that the evidence contained in the REA is robust and provides an appropriate baseline for the Plan.
- 6.7 (Strategic) Policy 34 provides a framework for assessing a range of renewable and low carbon energy proposals within the National Park. It was suggested during the Examination that the policy was not strategic in nature, its requirements weren’t clearly defined and, as a consequence, were likely to promote uncertainty. To address these concerns **MAC 47** and **48**, removes reference to ‘strategic’ in the title of Policy 34 and revises the provisions of the policy to: outline the type of renewable and low carbon sources which can be harnessed; make clear that schemes should not have an adverse impact on the special qualities of the National Park, residential amenity, highway safety or the telecommunication or aviation networks; and require proposals to make satisfactory provision for the restoration of sites after the use has ceased. These revisions will ensure that the policy provides clarity about the nature and scale of renewable and low carbon development in the National Park and accord with the requirements of PPW.

#### *Flooding and Coastal Inundation*

- 6.8 The Flood and Water Management Act (2010) places a requirement on all new development, of more than one dwelling or 100 square metres, to ensure that sustainable drainage techniques, such as, filter strips, swales and filter drains, are incorporated into the design and layout of all new schemes. This requirement is addressed at local level, by Policy 33 of the Replacement Plan which, in conjunction with Policy 30, provides a robust mechanism for ensuring the provision of sustainable drainage systems (SuDS) for qualifying development on all allocated and non-allocated sites within the National Park.

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<sup>59</sup> NPA067

<sup>60</sup> PPW10, paragraph 5.9.14

- 6.9 The framework for the management of flooding and coastal inundation is provided by Policies 35, 36, 37 and 38. Collectively these policies seek to: ensure development is directed away from areas at risk of flooding both now or predicted to be in the future by Technical Advice Note 15 Development Advice Maps or in the West Wales and South Wales Shoreline Management Plan 2; allow the construction of sustainable coastal defences; and manage the relocation of existing residential and non-residential properties affected by coastal change. The evidence base supporting these policies indicates that there are some 398 residential and 379 non-residential properties within 12 centres in the National Park that are at risk now or in the future of coastal inundation as a result of sea-level rise, coastal erosion and the loss of coastal defences<sup>61</sup>. To ameliorate for the loss of these properties, Policies 37 and 38, subject to **MAC 49, 50** and **51** which are necessary to provide certainty, permit the relocation and redevelopment of existing permanent dwellings and community, commercial and business uses that are located within the defined Coastal Change Management Area and are at risk/threatened by erosion or coastal inundation within a 20-year period.
- 6.10 The approach to the management of flooding and coastal inundation in the Replacement Plan provides a pragmatic and practical response to the issue of coastal change and accords with the requirement of PPW.

#### *Conclusions*

- 6.11 Subject to the MACs, the Replacement Plan will provide a positive framework for the management of climate change, sustainable design, renewable energy and flooding that is soundly based, justified and consistent with the requirements of PPW and the WCFG Act.

## **7 Visitor Economy and Employment**

- 7.1 The importance of growing the economy in a manner which is sustainable and contributes towards the long-term well-being of communities is a key principle of the planning system in Wales<sup>62</sup>. Given the character and special qualities of the National Park and its location, in terms of proximity to the national transportation network and urban Centres in South West Wales, it is not surprising that the economy of the area is driven by the needs of the rural and visitor economy. As a consequence, the economic strategy in the Replacement Plan focuses on creating and maintaining a diverse, viable and sustainable local economy that benefits all sections of the community and attract a sustainable number of visitors all year round to enjoy the special qualities of the National Park<sup>63</sup>.

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<sup>61</sup> NPA033 and HS4/AP5

<sup>62</sup> PPW10, Figure 3 – Key Planning Principles

<sup>63</sup> NPA061

### *Visitor Economy*

- 7.2 The Enjoyment Background Paper<sup>64</sup> indicates that the visitor economy in the National Park provides some 3,500 jobs and contributes approximately £200 million to the local economy. With many visitors choosing to stay in the National Park, much of this revenue is derived from short stay accommodation. The Background Paper suggests that, based on recent survey information, the National Park has some: 200 hotels, guest house and bed and breakfast establishments; 1668 self-catering properties; and 100 camping/caravan sites. It is clear from the evidence presented that the visitor sector is, and will continue to be, a key element of the economy and has the potential to bring significant social and economic benefits to the communities of the National Park.
- 7.3 The policy framework for the management of new and existing visitor accommodation and attractions is provided by Policies 39, 40, 41, 42 and 43. Collectively these policies seek: to provide a positive approach to the management of visitor attractions and accommodation which is balanced against the need to protect the special qualities of the National Park; attract visitors outside the peak season; and manage the provision, use and re-use of new and existing hotels, guest houses, self-catering accommodation and caravan, camping and chalet sites. I am content that Policy 41 and Policies 39, 40, 42 and 43, subject to **MAC 52, 53, 54, 55, 56** and **57** which are necessary to clarify the requirements of these Policies and ensure consistency with national planning policy, are sound.

### *Employment*

- 7.4 PPW 10<sup>65</sup> requires that development plans identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing sites. The evidence supporting these requirements is intended to be presented in an Employment Land Review (ELR).
- 7.5 The replacement LDP is not supported by an ELR and it does not identify employment land requirements or allocate sites for development. The reasons for this deviation from national policy are explained in the Employment Background Paper<sup>66</sup>, the Review Report<sup>67</sup> and through the additional evidence presented during the examination process<sup>68</sup>. The combination of this evidence explains that: the mainstay of the employment market, in terms of Class B uses, in the National Park is made up of small to medium sized enterprises with 10 or less employees<sup>69</sup>; none of the sites allocated in the original LDP for

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<sup>64</sup> NPA035

<sup>65</sup> PPW10, paragraphs 5.4.3 to 5.4.6

<sup>66</sup> NPA061

<sup>67</sup> NPA02

<sup>68</sup> HS5/AP2

<sup>69</sup> NPA061

employment and mixed-use development for live work units or workshops (as part of mixed use sites) saw those elements developed <sup>70</sup>; over the 5 years up to 2019 no inward investment or pre-application enquiries were received from developers looking for sites for Class B uses; and that this situation is attributable, in part, to the absence of public subsidies to support site delivery and the peripheral location of the National Park in terms of the established employment market.

- 7.6 Instead the Replacement Plan, through Policies 44 and 46, provides a framework for the delivery a range of local employment related proposals including, where appropriate, the development of new small-scale employment schemes on unallocated sites, live/work units, rural enterprise schemes and the diversification of existing farm businesses.
- 7.7 Although the approach to the provision of employment related development in the Replacement Plan varies from that outlined in PPW, I am content that, in light of the evidence presented and the nature and location of the National Park, it represents a realistic and constructive way of ensuring the delivery of beneficial economic activity and adheres with the wider objective of ensuring the social and economic well-being of communities.
- 7.8 The existing supply of employment land and buildings in the National Park is made up, largely, of micro, small and medium size businesses, which are spread throughout the area. There are only 5 large-scale employment sites within the National Park, these are located at: The Former St David’s Assemblies site, St David’s; South Hook LNG; and Salterns East, Salterns West and The Green, Tenby. Additional evidence presented during the examination indicates that all of these sites are subject to constraints<sup>71</sup> and would not be appropriate locations for alternative, non-employment related development.
- 7.9 In light of the sporadic distribution of micro, small and medium size businesses, and the constrained nature of the large-scale employment sites, Policy 45, correctly provides a generic framework for the protection of employment uses. In doing so, the policy seeks to protect existing employment land and buildings from being redeveloped or re-used for alternative uses, unless: it can be demonstrated that there is already an adequate provision of sites; the use is unviable; or inappropriate for its locality. Based on the evidence presented I am content that the approach to the provision and management of existing and proposed employment related development is sound.

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<sup>70</sup> The sites allocated in the original LDP for employment or live/work units or include workshops unit provision are: Sergenants Lane, Tenby; Land adjacent to the Business Park, Feidr Pen y Bont; Land south of St Davids Assemblies; Land between Glasfryn Road and Millard Park, St Davids; and Land at Broad Haven north east of Marine Road.

<sup>71</sup> HS5/AP2

## *Conclusions*

- 7.10 The overall the policy framework provided in the Plan for the visitor economy and employment, subject to the MACs, is clear, reasonable and appropriate and complies with the requirements of national planning policy.

## **8 Housing Provision and Distribution**

### *Housing Provision*

- 8.1 PPW 10<sup>72</sup> is clear that the latest WG local authority level Household Projections for Wales along with the latest local housing market assessment and the Well-being Plan for the area form an important part of a Plan’s evidence base. These documents together with an assessment of any other key evidence in relation to matters, such as the relationship between jobs and homes, the provision of affordable housing etc, will assist in determining an appropriate strategy for the delivery of housing in the Plan area. The statistical data contained in the household projections only provide estimates of the future numbers of households that would be required should past trends continue or if assumptions about household characteristics and composition are realised. The projections do not take into account local or national policy considerations and assumptions relating to matters such as migration and household formation rates which can significantly influence the outcomes. In this regard, it is for authorities to consider whether the various elements of WG projections are appropriate for their local area and, if not, undertake a modelling exercise which can be clearly evidenced to justify a departure.
- 8.2 The 2014-based Population Projections for the National Park indicate that the population of the PCNP would decline by 3,076 between 2015 to 2031, a reduction in the population of nearly 14%. This decline is attributable, largely to net migration levels and negative natural change factors with the projected number of deaths forecast to increase and the number of births forecast to decrease. This pattern continues in the 2014-based Household Projections, which show a projected decrease of 1,053 households in the PCNP over the Plan period.
- 8.3 The NPA recognised that in light of these trends, the conversion of the household projections, without any adjustment for local circumstances, would result in a negative dwelling requirement figure (DRF). In order to address this and to meet the Replacement Plan’s objective of delivering more affordable housing, the NPA commissioned the Pembrokeshire Coast National Park – Demographic Forecasts Study<sup>73</sup>. In addition to the Welsh Government 2014-based population projection for the National Park, the study tested a number of additional demographic and dwelling-led scenarios to determine the most appropriate approach for the Replacement Plan. Each scenario incorporated the mid-year population and births and deaths estimates for 2001–2016 and the 2011 Census dwelling vacancy rate of 26.7% for the National Park. The options tested included:

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<sup>72</sup> PPW 10, Paragraph 4.2.5 – 4.2.7

<sup>73</sup> NPA043

- Population Growth 10yr, which based assumptions on the last ten-years of migration history (2006/07–2015/16);
  - Population Growth Long Term, which based assumptions on the last fifteen-years of migration history (2001/02–2015/16);
  - Net Nil, in which migration inflows and outflows were balanced over the 2016/17–2030/31 forecast period, resulting in zero net migration; and
  - Four Dwelling-led scenarios which projected annual dwelling growth of 60, 70, 80 and 90 dwellings per year for the Plan period.
- 8.4 The findings of the study indicated a number of possible requirement figures, ranging from -1,440 dwellings (2014-based household projection scenario), to 1,392, (Dwelling-led (90) scenario). Based on the findings of the study and having regard to historical completion rates and need to deliver affordable housing, it was considered that the Dwelling-led (60) scenario, was the most appropriate option<sup>74</sup>. As a consequence, (Strategic) Policy 47 identifies a DRF of 960 dwellings for the Plan period.
- 8.5 I am content that the approach taken to the definition of the DRF has been undertaken in a considered manner, has had regard to both demographic and PCNP specific evidence and as a consequence, is robust.

#### *Housing Land Supply*

- 8.6 In order to meet the DRF, (Strategic) Policy 48, as submitted, identifies a Housing Land Supply (HLS) of 1,150 new dwellings. To ensure the currency of the LDP, **MAC 59, 60** and **62** correctly updates the base date of the Replacement Plan to 31<sup>st</sup> March 2019. As a consequence, the HLS is revised to 1,121 (**MAC 63**). The revised HLS is made up of:
- 366 dwellings on allocated sites which are considered to be free from abnormal technical or physical constraints;
  - 221 dwellings on sites that had been constructed between 1st April 2015 and 31st March 2019;
  - 138 dwellings on sites which had an extant planning permission on 31st March 2019; and
  - 396 dwellings on large and small windfall sites.
- 8.7 The updated monitoring data indicated that: since the submitted base date planning permission had been granted for 75 dwellings on a number of new sites in the National Park ; there was a reduction in the number of dwellings on allocated sites from 389 to 366; the number of dwellings on sites with planning permission had decreased from 147 to 138; and, the number of completions had increased from 154 to 221. The revised figure shows a decrease in the overall HLS from 1150 dwellings to 1,121. The reduction is of a modest scale and, in my view, will not adversely affect the supply of housing in the National

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<sup>74</sup> NPA044



Park over the Plan period. I consider that the updated figures provide a robust basis on which to calculate the Plan’s housing land supply.

- 8.8 Details of both the allocated sites and sites with planning permission are, subject to **MAC 65**, which is necessary to include reference to the permitted sites in (Strategic) Policy 48. In order to ensure that the status of these sites is accurately reflected in the policy, **MAC 65** updates Policy 48 to reflect changes in the planning status of the sites. Of the 20 sites identified in Policy 48, 10 are now shown as allocated sites and 10 as sites with planning permission. In effect just under half of the allocations are on sites which have the benefit of planning permission. In light of this, and to facilitate the delivery of these sites over the Plan period, **MMAP 4** modifies the Proposals Map to identify the sites with planning permission included in Policy 48.
- 8.9 The windfall element of the supply provides for 396 dwellings to be constructed on unallocated sites during the Plan period. This comprises 250 dwellings on small sites and 146 dwellings on large sites and equates to a combined annual delivery rate of approximately 33 dwellings. The allowance has been calculated having regard to the historic trend data in respect of completions on windfall sites over the period 2011 to 2019 for small sites (less than 5 units) and for the period 2009 to 2019 for sites of 5 or more units, which, when adjusted to take account of uncharacteristically high rates on large sites, demonstrates that windfall sites in the National Park over these respective periods, were delivered without showing a declining trend overall<sup>75</sup>.
- 8.10 In addition to supporting the windfall allowance, the evidence presented in respect of HS6/AP1 (Land Availability Study 2019 Records) also reveals that a total of 316 dwellings were constructed on unallocated sites during the early part of the Plan period. This equates to nearly 80% of the allowance for windfall sites within the HLS. Although the scale of provision significantly exceeds that envisaged at this stage in the Plan period, I am mindful that the rate of delivery will vary over time and consider that the exceedance will simply serve to reduce uncertainty about the supply of housing over the remainder of the Plan period.
- 8.11 Inherent in the HLS figure is the provision of a contingency allowance. Alterations to the supply figure have resulted in a reduction in the contingency allowance from 20 to 17%, which equates to 160 dwellings. **MAC 64** amends the Plan to explain the scale of the contingency figure and that it is necessary to ensure that there is a supply of housing over the Plan period. Despite its reduction, the scale of the contingency proposed exceeds that typically found in other LDPs. However, I am therefore content that the approach represents a realistic and sensible way of maintaining the delivery of housing over the Plan period.

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<sup>75</sup> HS6/AP1

*Housing Distribution and Delivery*

8.12 The housing growth identified in the Replacement Plan will be distributed in accordance with (Strategic) Policies 2, 3, 4, 5, 6 and 7. The growth within each level of the centre hierarchy will be as follows:

Centre Type	Service and Tourism	Local	Rural	Countryside
% Distribution of Housing	17%	38%	34%	11%

8.13 As the table illustrates local and rural centres will be the primary focus of new housing development with 423 dwellings in local centres and 384 dwellings in rural centres. Provision within these centres will, primarily, be based on a combination of committed and allocated sites. Whilst the delivery of new housing in the other tiers of the hierarchy will be dependent on the development of small and large windfall sites.

8.14 The Replacement Plan, as submitted, does not contain a specific policy for the assessment of new private market and affordable housing development on unallocated sites within the defined centres and countryside, rather it relies on the requirements of (Strategic) Policies 2, 3, 4, 5, 6 and 7. In order to simplify the approach and to provide greater clarity about development requirements, **MAC 77** and **78** introduce a policy to manage housing development within the centres and countryside. The new policy provides a positive framework which requires that new market housing development in centres will be focussed on allocated or suitable windfall sites within the defined centre boundary. The provision of affordable housing will be located on exception sites adjoining centre boundaries. The new policy also seeks to limit the development of new market housing in rural centres, without centre boundaries, to sensitive infilling or minor rounding off and to restrict new development in the countryside to that which meets the requirements of national policy. This approach will focus development in sustainable locations, assist in conserving the character and appearance of rural centres and reduce the encroachment of new development into the countryside.

8.15 In terms of centre boundaries, the NPA’s Hearing Statement<sup>76</sup> explains that they are based on those contained in earlier development plans and have been adjusted to take account of up-to-date mapping, new development, extant planning permissions and the removal of allocated sites which have not been included in the Replacement Plan.

8.16 On the basis of the evidence provided, I am content that the approach taken to the definition of development boundaries is logical, would ensure the efficient use of land, promote cohesive development patterns for Centres in the Plan

<sup>76</sup> NPA’s Statement for Hearing Session 6 – Housing Provision & Distribution

area and allow for future windfall development to take place in appropriate locations.

- 8.17 In order to meet the housing requirement of 960 dwellings contained in (Strategic) Policy 47, 64 dwellings per annum will need to be constructed in the National Park throughout the Plan period. Evidence presented during the examination<sup>77</sup> suggests that, although the delivery fell below the required level during 2015/16 and 2017/18, 69 and 57 dwellings per annum were constructed in 2016/17 and 2018/19. The most recent land availability data and trajectory<sup>78</sup> provides an overview of the scale, composition and timing of new housing development in the National Park over the Plan period. The data, which **MAC 97** inserts into the appendix of the Replacement Plan, is not intended to be prescriptive but provides an estimate of housing delivery based on best available information. That accepted, the trajectory indicates that the supply of housing land of the required level will be available during the early and middle of the Plan period and only start to reduce in the years close to 2031.

#### *Other housing policies*

- 8.18 The issues of housing density and mix are addressed in Policy 50. The policy as drafted lacks precision and as a result does not provide the certainty necessary to ensure its requirements are achieved. In order to ameliorate this, **MAC 79, 80 and 81** revise Policy 50 to focus on matters in relation to housing density and create a new, more succinct, policy to address the issue of housing mix.
- 8.19 Policy 52 seeks to ensure that one planet developments in the PCNP are of a higher standard in terms of community assimilation, sustainable design and landscape integration than required by national policy. The NPA recognises that any departure from the requirements of national policy needs to be supported by locally specific evidence, and in the absence of such information, proposes the deletion of the policy (**MAC 84 and 85**).

#### *Conclusions*

- 8.20 The provision and distribution of housing land set out in the Replacement Plan is realistic and appropriate and founded on a robust and credible evidence base. It will achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy. Subject to the MACs, the policies are clear, reasonable and appropriate.

## **9 Allocated Sites**

- 9.1 The NPA invited the submission of candidate sites for development between August and November 2016. The invitation resulted in the submission of 148 sites, the majority of which were proposed for market/affordable housing, with others being promoted for commercial/tourism related uses and as open space<sup>79</sup>. A further 17 sites were submitted at the Preferred Strategy

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<sup>77</sup> HS6/AP1

<sup>78</sup>

<sup>79</sup> NPA020

consultation stage and 24 sites at the Deposit consultation stage, making a total of 189 sites altogether.

- 9.2 The sites were subject to an initial filtering on the basis of their size and location. The sites were then categorised into residential sites, capable of accommodating 5 or more dwellings, and non-residential sites. The residential sites were then subject to a three-stage assessment which considered: the development potential of the site; compatibility with the SA/SEA, HRA, EIA and Welsh Language Impact Assessment (if required); and whether the site would be compatible with the Plan’s Strategy. Non-residential sites were subject to; a ‘use’ specific assessment of need and locational suitability; and, as with residential sites, an assessment of compatibility with other assessments and the Plan’s strategy<sup>80</sup>.
- 9.3 A further, more detailed assessment of the deliverability of the residential sites was undertaken as part of the Land Implementation Study<sup>81</sup>. The study assessed: constraints to the development of sites; the requirement for planning obligations for education provision and community facilities; the requirements for new and/or improved infrastructure to serve the site; and viability.
- 9.4 The results of the assessment process undertaken in respect of each site provides the evidential basis for the site allocations contained in the Replacement Plan. The scale of development on each allocated site has been estimated having regard to the size of the site, the presence of constraints, character of the surrounding area and the application of the average density figures for residential development (Policy 50). The analysis of the deliverability of each of the allocated sites demonstrates that the allocations are: in marketable areas; available for development within the Plan period; not subject to significant constraints; and that their development would appear to be economically viable.
- 9.5 On the basis of the evidence presented and discussions at the hearing sessions, I am satisfied that the analysis of the deliverability of individual sites has been undertaken in a rigorous and comprehensive manner and that the allocated sites are, largely, free from significant constraint.
- 9.6 Table 7 and 8 of the Replacement Plan contains a schedule that provides information about the requirements for housing allocations and large windfall sites. The schedule does not however, provide any indication of when the development of individual sites would take place, the planning history of the sites or the requirements for planning obligations. The omission of this information, in my view, would create uncertainty particularly for the local community, promoters of the sites and infrastructure providers. In order to ameliorate the situation, MAC 66, 67, 68 and 98 includes tables in the appendix of the Replacement Plan which set out the known requirements for, and constraints to, the development of housing allocations and windfall sites. This approach would provide greater certainty and assist in the delivery of allocated sites in the National Park.

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<sup>80</sup> NPA029

<sup>81</sup> NPA052

### *Housing Allocations*

#### *Policy 48 (HA3) - Land North of Business Park, Newport*

- 9.7 The land north of the Business Park, comprises 0.5 hectares of agricultural land, which is allocated for the construction of 15 dwellings.
- 9.8 The location of the site, adjacent to the urban fringe of Newport, together with the presence of mature landscaping along the field boundaries would ensure that the allocation, when developed, would not be a prominent feature in the landscape but would integrate effectively into the urban area. With regard to access, the proximity of the allocation to the highway coupled with the presence of an existing entrance and visibility splay to the site and a nearby public footpath, would ensure that safe vehicular and pedestrian access is available. In respect of the impact that the proposed allocation would have on the Carreg Coetan Burial Chamber Scheduled Ancient Monument (SAM), although located close to the site I am mindful that the Burial Chamber is situated behind the built development and, as a result, is visually separated from the allocation. As such, I do not consider that the proposed allocation would have a harmful effect on the setting of the SAM. With regard to the issue of flooding, I note that the allocation is not within a flood zone as defined by Technical Advice Note 15 – Development and Flood Risk, but that representors suggest that the site is, in part, subject to surface water flooding. Although an important consideration, it can be effectively addressed through the application of an appropriate drainage scheme<sup>82</sup>.

#### *Policy 48 (HA4) - Land at Sandy Hill, Saundersfoot*

- 9.9 The Land at Sandy Hill, comprises 2.26 hectares of agricultural land, and is allocated for the construction of 68 dwellings.
- 9.10 The site is located, immediately adjacent to a modern housing estate on the urban fringe of Saundersfoot and is enclosed by mature trees and hedgerows. The location of the site and nature of the enclosure would ensure that any future development would not be highly visible in the landscape but would integrate effectively into the urban area. In terms of the increase in traffic, whilst concerns are noted, no substantive evidence has been presented to demonstrate that any increase would have an adverse impact on either highway safety or capacity. Moreover, although the topography of the surrounding area may deter some residents from accessing retail and commercial services on foot, the site is on an established bus route and therefore opportunities exist for these services to be accessed by means other than by private car. With regard to the adequacy of local medical services, the oral and written evidence presented by the NPA confirmed that capacity exists within these services to accommodate the needs of an expanded population<sup>83</sup>.

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<sup>82</sup> NPA054

<sup>83</sup> Exam51

*Policy 48 (HA5) - North of Whitlow, Saundersfoot*

- 9.11 The land north of Whitlow site, comprises 1.8 hectares of land adjacent to woodland which is allocated for the construction of 54 dwellings.
- 9.12 The site, is situated on the northern fringe of Saundersfoot and bounded on its eastern and western sides by the residential road of Whitlow and the B4316. The location of the site gives rise to concerns that its development would have an adverse effect on the amenity of nearby residents and result in the loss of wildlife and/or ancient woodland. Although noted, matters in relation to residential amenity can be effectively addressed through the design and layout of any future development. In terms of biodiversity, I am content that any impact on the priority habitats found on the allocated site or the adjacent Planted Ancient Woodland, can be effectively managed and if necessary mitigated or compensated for as part of any future planning application process. With regard to access, although I recognise the narrow and constrained nature of the surrounding highway network, I am mindful that the evidence presented by the NPA explains that, subject to improvements on the local network, increased traffic movements to and from the site can be safely accommodated.

*Policy 48 (HA6) - Penny Farm, Saundersfoot*

- 9.13 The Penny Farm site comprises 1.13 hectares of agricultural land, which is allocated for the construction of 36 dwellings.
- 9.14 The allocated site is situated on the western fringe of Saundersfoot immediately to the west of the residential properties at North Close and to the north of the Ridgeway. The location of the site, enclosed on three sides by built development and The Fan Road, will ensure any future development would not be visually prominent and would integrate into the townscape of this part of Saundersfoot. In terms of highways, although the existing entrances to the site are substandard, evidence presented by the NPA indicates that, subject to improvements to the site’s access and on the local network, increased traffic movements can be accommodated safely and in a manner that would not have an adverse impact on residential amenity. Similarly, I am content that, based on the submitted evidence, any localised issues in relation to sewerage capacity can be addressed through a scheme of improvements. With regards to the suggested presence of Bats and Badgers on the site, I consider that any biodiversity interests could be effectively managed and if necessary mitigated or compensated for as part of any planning application process.

*Conclusions*

- 9.15 Relevant alternatives have been considered and the identification of the allocated sites are based on a robust and rational site selection process. In my view, the allocated sites are likely to be deliverable within the plan period, would make an appropriate contribution towards achieving the Replacement Plan’s strategy and could be developed in accordance with the requirements of the National Placemaking Outcomes.

## 10. Affordable Housing

### *Affordable Housing Need*

- 10.1 PPW 10<sup>84</sup> requires development plans to include an authority-wide target for provision of affordable homes which is based on the LHMA and takes into account deliverability and viability. The Pembrokeshire LHMA (2014) provides an assessment of the local housing market in both the County and the National Park for a five-year period and outlines the nature and scale of future housing need in the County. Although I note that a replacement for the LHMA is being prepared, the final version of the document has yet to be issued. As such, the 2014 LHMA for the National Park provides the most robust and up to date evidence for the Plan area.
- 10.2 The findings of the LHMA indicate that there was a need for 1450 social rented homes and 289 intermediate homes per annum in Pembrokeshire in the period up to 2019. When these figures are adjusted for the National Park, they show a need for 370 affordable houses per annum. This equates to 5,550 new affordable houses over the 15-year Plan period<sup>85</sup>. Approximately 80% of the defined need is for 1-bedroom dwellings with the remaining need spread across 2, 3, 4 and 5-bedroom properties. In order to provide certainty about future requirements, **MAC 71** correctly amends the reasoned justification of (Strategic) Policy 49 to include an explanation of the findings of the LHMA in respect of housing need and how it will be met in the National Park over the Plan period.
- 10.3 The approach taken in the LHMA is consistent with the methodology promoted at national level and, as such, provides a robust basis for the assessment of affordable housing need.

### *Affordable Housing Viability and Deliverability*

- 10.4 The findings of the Affordable Housing Viability Study (2017)<sup>86</sup> (AHVS) and the Housing Background Paper<sup>87</sup>, provide the evidential basis for the Replacement Plan’s approach to securing affordable housing. The study employs the development appraisal model and, utilising a variety of assumptions, tests a range of sites located within the eight sub-market areas of Newport, Tenby, South East Coast, St Davids and North Coast, South West Coast, St Brides Bay, Estuary Hinterland and North East National Park, in order to determine the contribution new residential schemes can make to the supply of affordable housing in the Plan area.
- 10.5 The development appraisal contains a range of factors including construction costs, land values, developer profit, S106 contributions which include the data from the NPA estimates the likely cost of highways, education, and open space

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<sup>84</sup> PPW 10, paragraph 4.2.28

<sup>85</sup> NPA Hearing Statement for Session 6 – Affordable Housing, LOC03 and Exam06

<sup>86</sup> NPA042

<sup>87</sup> NPA048

requirements. The AHVS includes benchmark land values for each of the sub-market areas that are based on an assessment of current market conditions and are considered to be sufficient to incentivise owners to release land. The land values range from approximately £284,000 per hectare to just over £550,000 per hectare. When adjusted to take account of the density requirement contained in Policy 50 of the submitted Replacement Plan and differing levels of affordable housing contributions, the residual land values range from between £320,000 per hectare in the Estuary Hinterland sub-market area to £1.8 million per hectare in the Tenby sub-market area.

- 10.6 The build costs identified in the AHVS are based on the data provided by the Building Costs Information Service (BCIS) and have been adjusted for Pembrokeshire. As the cost of fire safety systems was only partially reflected in the data it was agreed that an additional allowance for the systems needs to be included in viability studies. To rectify this omission, the Housing Background Paper provides revised residual land values for the eight sub-market areas which take into account the cost of fire safety systems<sup>88</sup>.
- 10.7 The site thresholds are based on those in the original LDP and have been derived by calculating the point at which the percentage requirement for affordable housing on a site would result in a whole dwelling being provided<sup>89</sup>. The calculation indicates that provision for affordable housing could be secured on, sites of 2 or more dwellings in Newport, Tenby and the South East Coast; 3 dwellings in St Davids and the North Coast; 4 dwellings in the South West Coast; 5 dwellings in St Brides Bay; and 7 dwellings in the Estuary Hinterland and the North East National Park. Although the method used to define on-site thresholds is unconventional, the monitoring evidence contained in the LDP Annual Monitoring Reports supports the approach and demonstrates that it is effective and appropriate for the National Park<sup>90</sup>.
- 10.8 The results of the AHVS, as adjusted by the Housing Background Paper, indicate that in the sub-market areas, subject to site thresholds, there is sufficient headroom to support an affordable housing contribution of: 50% in Newport, Tenby and the South East Coast; 35% in St Davids and North Coast; 25% in the South West Coast; 20% in St Brides Bay; and 15% in the Estuary Hinterland and North East National Park.
- 10.9 I am content that the AHVS, as amended by the Housing Background Paper, has been prepared in accordance with the requirements of national planning policy and provides a robust and comprehensive basis on which to determine the Plan’s affordable housing thresholds and targets.

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<sup>88</sup> NPA048, Appendix 4

<sup>89</sup> NPA Hearing Statement for Session 7 – Affordable Housing Provision

<sup>90</sup> NPA077



### *Affordable Housing Provision*

- 10.10 The Replacement Plan, as submitted, provides an estimated affordable housing target of 250 new dwellings to be delivered through the planning system over the period up to 2031. During the course of the examination it was suggested that the Plan did not provide an affordable housing target that accurately reflected the potential supply of new social rented or intermediate dwellings in the National Park. To address this, **MAC 58**, correctly, revises the affordable housing target from 250 to 362 dwellings. The revised target will be met by the 64 dwellings on completed sites and through the provision of 57 dwellings on sites which already have planning permission, 142 dwellings on allocated sites and the remainder, some 99 dwellings, on windfall sites (**MAC 61**). Whilst it is clear that the affordable housing target will not meet the defined need for new social rented and intermediate housing in the National Park, I am content that the approach to defining the target is realistic, deliverable and based on robust evidence, and that other mechanisms, such as social housing grant and Council Tax Second Homes Premium, exist outside the planning system to assist in meeting the defined need in the PCNP<sup>91</sup>.
- 10.11 The framework for the provision of affordable housing is provided by a combination of (Strategic) Policy 49 and new policies in relation to the management of housing development in Centres and the development of affordable housing on exception sites. (Strategic) Policy 49, outlines the target for the provision of affordable housing in the National Park and the mechanisms for securing new intermediate and social housing. Concerns have been expressed that the policy, as submitted, was not sufficiently clear about the application of its requirements. To provide greater clarity **MAC 69, 70, 72 and 73** are necessary to amend (Strategic) Policy 49 to: outline succinctly, the requirement for affordable housing to be provided on qualifying sites in each sub-market area; explain the approach to securing and managing commuted sums for off-site provision (in accordance with Policy 53); simplify requirements in relation to the reuse/conversion of redundant buildings in the countryside for affordable housing; and make reference to a new policy for the provision of new affordable housing on exception sites. In order to ensure the necessary certainty about the geographical application of the policy, **MMAP 5** introduces amendments the Proposals Map to include the annotation of the affordable housing sub-market areas.
- 10.12 To maximise provision, **MAC 75 and 76**, correctly, introduce a new policy which seeks to ensure the development of exception sites for affordable housing, within or adjoining the centres, by promoters such as Registered Social Landlords, Pembrokeshire County Council and Community Land Trusts. I am content that the approach taken in the policy accords with the requirements of Technical Advice Note 2 – Planning and Affordable Housing and provides an appropriate framework for managing new development on exception sites.
- 10.13 In addition, in response to the Minister for Housing and Local Government’s letter of 8<sup>th</sup> July 2019, the NPA has carried out a review of publicly and

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<sup>91</sup> HS7/AP4

privately-owned land within the Plan area which was promoted for development by public bodies through the Plan process. The review concluded that whilst there were currently no suitable and deliverable publicly owned sites, opportunities did exist for privately owned allocated sites within the Tenby and Newport sub-market areas to include the provision of 50% affordable housing<sup>92</sup>. In recognition of the potential for publicly owned land, which is presently used for other purposes, to become available during the Plan period, **MAC 74** proposes to amend the reasoned justification of Strategic Policy 49 to include an expression of support for the delivery of affordable housing-led schemes.

### *Conclusions*

- 10.14 Overall, I am satisfied that the approach to the provision of affordable housing in the Replacement Plan, subject to the MACs, is supported by robust and credible evidence. Whilst the level of provision sought through the Plan will not meet all of the need identified in the LHMA, I am content that the target contained in Strategic Policy 49 is realistic and that the inclusion of measures such as low site thresholds, different targets for sub market areas and a rural exceptions policy will maximise the opportunities for delivery.

## **11 Provision for Gypsies and Travellers**

### *Gypsy and Travellers Accommodation Need*

- 11.1 The Gypsy and Traveller Accommodation Assessment for Pembrokeshire (2015) (GTAA)<sup>93</sup> explains that the County, at the time of the assessment, had a well-established Gypsy and Traveller community that was, largely, accommodated on five local authority run, and twelve privately owned sites. None of the sites identified in the GTAA are located within the National Park. In order to determine future accommodation needs, the GTAA: reviewed the existing provision within the County including site occupancy and supply data; collected and assessed a range of data obtained from engagement with representatives of the Gypsy and Traveller communities. The findings of the GTAA indicate that there is a need for 32 residential pitches for Gypsy families and 2 yards for Travelling Showpeople in the period up to 2020. When extrapolated over the Plan period the projected requirement is for 101 pitches, plus 2 yards. The requirement arises, predominantly from the need to provide additional pitches on existing sites to address the issue of overcrowding or to provide for the expanded accommodation needs of resident families. No specific need for new pitches was identified in the National Park.
- 11.2 A revised GTAA is currently being prepared and is likely to be available in 2020. Should the findings of the assessment indicate that there is a specific need for accommodation to be provided in the National Park, I am content that this requirement could be addressed through the annual monitoring process and the application of Policy 51. Moreover, I am satisfied, that the approach taken to

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<sup>92</sup> HS7/AP1

<sup>93</sup> LOC01

determining the need for accommodation in respect of the National Park is based on clear and robust evidence which has been prepared in a manner that is consistent with the requirements of PPW 10<sup>94</sup> and the Housing (Wales) Act 2014.

#### *Gypsy and Travellers Accommodation*

- 11.3 In light of the findings of the GTAA, the replacement LDP makes no specific allocation for the provision of new Gypsy and Traveller accommodation within the National Park. Rather the Plan, through Policy 51, provides a framework for the management of development on non-allocated sites in the Plan area where: there is evidence of need for a permanent or transitory site in the area; and the site is well located to meet Gypsy and Traveller needs, is accessible, serviced and will not have an adverse impact on the residential or visual amenities of the area. It was suggested during the course of the examination that the requirement to demonstrate ‘need’ was contrary to the requirements of Welsh Government Circular 30/2007 – Planning for Gypsy and Traveller Caravan Sites. This is a point accepted and, as a consequence, **MAC 82** and **83** delete the relevant criterion.

#### *Conclusions*

- 11.4 I am satisfied that, subject to the MACs, the Plan provides a sound and robust framework for the provision of Gypsy and Traveller accommodation which complies with national planning policies and meets the legislative requirements of the Housing (Wales) Act 2014.

## **12 Community Facilities, Retailing, Transport**

#### *Community Facilities and infrastructure*

- 12.1 A key objective of the Replacement Plan is to encourage the retention and provision of a network of community facilities that reflect the needs of both National Park residents and visitors. These facilities play an intrinsic role in the life of the National Park’s communities and are crucial for their economic, social and environmental well-being. The Scale and Location of Growth Background Paper provides an overview of the level and diversity of the existing provision including educational and health provision; recreational facilities; libraries; village / community halls; post offices; and bus services<sup>95</sup>.
- 12.2 The framework for the provision and protection of community facilities and infrastructure in the submitted LDP is provided by Policy 53. Although there is some commonality, Policy 53 brings together two different areas of land use policy, and in doing so, does not provide a sufficiently clear or logical mechanism for the management of existing community facilities or securing the

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<sup>94</sup> PPW 10, paragraph 4.2.35

<sup>95</sup> NPA036

provision of new community facilities, infrastructure or services. To ameliorate this, **MAC 86, 87, 88** and **89**, create two separate policies.

- 12.3 The amended Policy 53 provides a framework for the protection of existing community facilities that recognises the changing socio-economic landscape and seeks to prioritise the re-use of redundant community facilities for affordable housing or employment related development. The new policy will provide the mechanism for securing contributions for the provision of new and improved infrastructure including affordable housing, recreation and amenity open space facilities, community facilities, education provision, transportation improvements, public art and biodiversity mitigation and enhancement.

#### *Retail*

- 12.4 The South West Wales Retail Study (2018)<sup>96</sup>, which was commissioned jointly by the NPA, Pembrokeshire County Council and Ceredigion County Council, provides the evidential basis for defining the retail hierarchy and the need for new convenience and comparison floorspace across the two Counties.
- 12.5 The findings of the study, when disaggregated to provide NPA specific data, suggested<sup>97</sup> that: there should be a two-tier retail hierarchy in the National Park comprising the ‘Town Centre’ of Tenby followed by the ‘District Centres’ of St Davids, Saundersfoot and Newport; there is no significant need for new floorspace for convenience goods; but that a need exists for 1,006 sqm of new floorspace for comparison goods. The floorspace requirements for comparison goods were refined during the examination, to have regard to the Replacement Plan’s strategy for the provision and distribution of new housing in the National Park. These adjustments increased the requirement for new floorspace for comparison goods to 1,240 sqm (net)<sup>98</sup>. Evidence suggests that the level of need for new comparison goods floorspace could be accommodated within vacant premises within Centres in the retail hierarchy<sup>99</sup>. This includes the provision of 707sqm of floorspace in Tenby, 346 sqm in St Davids, 109sqm in Saundersfoot and 108sqm in Newport.
- 12.6 The framework for managing new retail development in the National Park is provided by Policies 54 and 55. (Strategic) Policy 54, as correctly revised by **MAC 90** and **91** outlines the revised requirement for, and distribution of new comparison floorspace in the National Park, and makes clear that proposals for new development within the defined retail Centres which are of an appropriate scale and design will be supported.
- 12.7 The definition of retail hierarchy and identification of need for the National Park are based on robust and credible evidence, consistent with the requirements of national policy and are therefore sound.

#### *Transport*

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<sup>96</sup> REG1 and REG2

<sup>97</sup> NPA066

<sup>98</sup> NPA Hearing Statement for Session 5

<sup>99</sup> NPA066

- 12.8 PPW 10<sup>100</sup> requires LDPs to set out an integrated planning and transportation strategy that facilitates and promotes access for all, reduces the need to travel by private vehicles and promotes sustainable modes of transport such as ultra-low emission vehicles, public transport, walking and cycling. In order to achieve these objectives, Policies 57, 58 and 59, promote, integrate and coordinate sustainable travel; safeguard new and existing transport routes; support appropriate transport infrastructure and traffic management improvements; and manage the impact of new development on the communities and the built, historic and natural environment<sup>101</sup>. The approach taken in these policies is consistent with the requirements of national planning and transportation policy and therefore supported.

### *Conclusions*

- 12.9 Overall, I am content that the Plan’s requirements for retail, community facilities, and sustainable transport are supported by robust and credible evidence and consistent with the requirements of national policy.

## **13 Plan Monitoring and Review**

- 13.1 The monitoring framework is provided by a combination of the indicators contained in the Replacement Plan and SA. The findings of the NPAs monitoring process will be reported in the Annual Monitoring Report (AMR).
- 13.2 Chapter 5 of the replacement LDP contains a Monitoring Framework which sets out the indicators to be used to monitor delivery of the Plan’s policies and proposals. The framework is set out under eight headings, which relate to the National Park Purpose and Duty and the Strategy, the Plan’s six priority areas and Supplementary Planning Guidance, and consists of core / local indicators, monitoring targets, trigger points, relevant policies and the reason for the indicator. The framework identifies a range of colour coded actions which, should the monitoring process indicate that the Plan is not delivering in the manner intended, will signal a need for remedial action.
- 13.3 In order to ensure the currency of the monitoring framework after the Replacement Plan’s adoption, **MAC 92** updates the indicator 23 to reflect the revised affordable housing target and **MACs 93, 94** and **95** include new indicators required by the emerging Development Plans Manual. These include indicators in relation to the spatial distribution of housing development, the number of net additional general market dwellings built and the tenure of affordable housing completions.
- 13.4 The SA indicators monitor the significant environmental effects of the Replacement Plan, they are designed to identify any unforeseen adverse effects and enable appropriate remedial action to be taken. The monitoring framework

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<sup>100</sup> PPW10, paragraphs 4.1.5 to 4.1.7

<sup>101</sup> NPA068

is set out under the 15 Sustainability objectives and identifies a series of potential contextual indicators each of which will, individually or collectively, assist in assessing whether: the plan is contributing to the achievement of integrated objectives and targets (including SEA requirements); mitigation measures are performing as well as expected; and any adverse effects are within acceptable limits or whether remedial action is required.

### *Conclusions*

- 13.5 I am content that the provisions made for the monitoring in the Replacement LDP, as amended by the MACs, are consistent with national planning policy and will provide a robust and sound basis on which to assess the performance of the Plan.

## **14 Overall Conclusions**

- 14.1 I conclude that, with the binding changes identified in this report and set out in Appendix A, the Replacement Pembrokeshire Coast National Park Authority Local Development Plan (2015 -2031) satisfies the requirements of section 64(5) of the 2004 Act and meets the WG’s tests of soundness. In reaching this conclusion, I have taken into account the ways of working set out at section 5 of the Well Being of Future Generations Act 2015. The Replacement Pembrokeshire Coast National Park Authority Local Development Plan as modified will guide the development and use of land in a way that contributes towards improving the economic, social, environmental and cultural well-being of Wales and complies with the WCFG Act 2015.

*Nicola Gulley*

Inspector

Appendix A: Schedule of Matters Arising Changes (MAC) recommended by the Inspector