

REPORT OF THE HEAD OF PARK DIRECTION

SUBJECT: LOCAL DEVELOPMENT PLAN 2: SUPPLEMENTARY PLANNING GUIDANCE (SPG) CONSULTATIONS

Purpose of this Report

1. This report asks Members to consider responses received on consultations undertaken on draft Supplementary Planning Guidance. Members are asked to adopt new and updated Supplementary Planning Guidance (SPG) documents subject to amendments proposed in response to the consultation responses received.

Background

2. The guidance documents consulted upon are listed below. Two were joint guidance document with the County Council.

Archaeology	Joint
Biodiversity	Joint
Caravan, Camping and Chalet Development	
Parking Standards	
Community Land Trusts & Affordable Housing	
Renewable Energy	
Sustainable Design and Development	

3. The joint guidance documents on Archaeology and Biodiversity cover the whole of Pembrokeshire. The rest just cover the Pembrokeshire Coast National Park. In September 2020 this Authority agreed to publish these draft Supplementary Planning Guidance documents for public consultation. It is understood that Pembrokeshire County Council is considering its response to the consultation on 17th May 2021.

Officer Appraisal

4. A public consultation on the guidance started in October 2020 and ended on the 12th February 2021. A formal notice was published in the Western Telegraph and Pembrokeshire Herald advertising the consultation and a press release advertising the consultation was also sent to local papers and radio outlets. Copies were made available on our websites. The consultation period for all documents ran for three months until 4.30pm on 12 February 2021. A reminder of the impending closing date for comments was placed in a press release in mid-January 2021.
5. A report summarising the results of the public consultation and identifying recommended changes to the Supplementary Planning Guidance is attached at

Appendix A. A total of nineteen responded, making ninety five representations on the documents. One late representation was received. The commentator had no issues to raise on the consultation and is not included in this report. Appendix B contains the text of those representations that were difficult to provide a summary of in Appendix A. Appendix C provides the proposed edited pages of the consultation documents, using 'underlining' for inserts and 'strike throughs' for deletions. The original documents that were approved for consultation can be found in the link in the footnote¹:

6. The main issues and changes identified to the Supplementary Planning Guidance following the public and internal consultations are:
 - a. The need to include advice regarding the protection of peat in the Biodiversity Guidance.
 - b. Clarification needed on the role of Place Plans.
 - c. landscape sensitivities and the ability of the National Park to accommodate more renewable energy.

Financial considerations

7. The Authority had a budget available to carry out this consultation. It is a requirement to complete a consultation for such documents so that they can be given weight in the Authority's planning decision making.

Risk considerations

8. The guidance when adopted will provide an updated position regarding planning requirements in line with the recently adopted Local Development Plan 2 and national planning policy.

Equality considerations

9. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relation between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Authority needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief). Local Development Plan 2's policies have been subject to an Equalities Impact Assessment. The supplementary planning guidance is written to support these policies.

Welsh Language considerations

10. The publication and consultation exercises are carried out in accordance with the Welsh Language (Wales) Measure 2011 and the Welsh Language Standards Regulations (No.1) 2015.

¹ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/supplementary-planning-guidance-ldp2/>

11. Assessing impacts on the Welsh language is also an integral part of the Sustainability Appraisal process for Local Development Plan preparation.
12. The relevant policies that this guidance supports have been subject to appraisal.

RECOMMENDATION

That Members:

1. Agree the Officers' responses to the consultation responses received in Appendix A and Appendix B.
2. Adopt Supplementary Planning Guidance on²:
 - a) [Caravan Camping and Chalet Development](#)
 - b) [Parking Standards](#)
 - c) Place Plan – [Community Land Trust & Affordable Housing](#)
 - d) [Renewable Energy](#)
 - e) [Sustainable Design and Development](#)
 - f) [Archaeology](#) (Joint with Pembrokeshire County Council)
 - g) [Biodiversity](#) (Joint with Pembrokeshire County Council)Subject to the edits proposed in Appendix A and C this report.
3. Provide delegated authority to the Head of Park Direction to make further minor edits to include taking account of Pembrokeshire County Council's consideration of the representations on the two Joint Supplementary Planning Guidance documents (i.e. the Biodiversity and Archaeology Supplementary Planning Guidance documents). Any proposed changes by Pembrokeshire County Council which are substantive nature will be reported back to the National Park Authority for further consideration.

Background papers:

[Local Development Plan 2 - Pembrokeshire Coast National Park development-plans-manual-edition-3-march-2020.pdf \(gov.wales\)](#)
[Planning Policy Wales, edition 11](#)

(For further information, please contact Martina Dunne, ext 4820)

Authors: Martina Dunne, Gayle Lister, Sarah Hirst (Park Direction)
Consultees: Tegryn Jones and Nicola Gandy. Dyfed Archaeological Trust (on a specific issue), Natural Resources Wales (on a specific issue), the Authority's Ecologist. Pembrokeshire County Council, Forward Planning.

² Weblinks to each guidance document is provided in the recommendation.

Report of Consultations
APPENDIX A
Supplementary Planning Guidance

Rep No.	Reference	Representation	Officer Response and Recommendation
	General (Joint)		
1.	3950/Gen Welsh Government Network Management Division Transport	The Welsh Government (Network Management Division) has no significant comments relating to the comprehensive LDP2 SPG consultation.	Comment noted. No change needed.
2.	4180/Gen Ministry of Defence Estates – Safeguarding Defence Infrastructure Organisation	<p>The county of Pembrokeshire and also the National Park contains a number of MOD sites along with all or part of Safeguarding zones designated to protect technical assets and explosive storage sites. Statutory safeguarding zones surround Cawdor Barracks, Manorbier and Castlemartin Ranges and the MOD should be consulted on development within these safeguarding zones so we can assess proposed developments and determine any impact on our assets and operations. The provision of new housing and the creation of new and/or expanded caravan, camping and chalet sites within these zones would need to be assessed by the MOD.</p> <p>Where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. An example of this type of development is the installation of wind turbine generators. Wind turbines can impact on military aviation activities in particular they can degrade and cause interference to the effective operation of radar and other air traffic systems. The MOD therefore needs to review all applications for all types of wind turbines 11 metres or greater in height or turbines with rotor blades 2 metres or greater in length. Policy 31 of the adopted Local Development Plan requires any effect on radars to be demonstrated.</p>	<p>Comments noted.</p> <p>The respective planning authorities' development management service will consult the Ministry of Defence in accordance with the relevant Safeguarding Zones provisions.</p> <p>With regard to developments falling outside designated safeguarding zones the National Park Authority and the County Council do carry out these consultations.</p> <p>No change needed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		The MOD has no objection to the new and proposed changes to existing Supplementary Planning Guidance items however the presence of statutory safeguarding zones within the county of Pembrokeshire and the Pembrokeshire Coast National Park should be taken into account by decision makers and also the requirement to consult the MOD on all wind turbine developments exceeding 11 metres in height.	
3.	0/Gen Authority Member	Are there were likely to be any changes to landscape character areas as a result of the loss of Ash trees as a result of Ash Die Back, given that this has been quite a significant issue in some places.	<p>Advice was sought from Natural Resources Wales (NRW).</p> <p>NRW are keen to try and keep LANDMAP up to date as far as possible, and any significant change in a locality can warrant an update to the LANDMAP surveys and mapping.</p> <p>The NRW Officer advised that many trees are 'living with' ash dieback so their contribution as yet may not be lost in the landscape. But where there is a remarkable change we can update the LANDMAP records/GIS/survey including any recommendations on what to do, if anything.</p> <p>NRW does not have a means to do this nationally at present.</p> <p>For a change to be implemented it would need to be a change that is significant enough to change the character/aspect area classification and/or evaluation or just to update the survey description because the existing description does not reflect the current situation.</p> <p>NRW would also welcome any locally available evidence to assist in its understanding of the issue.</p> <p>The issue will continue to be monitored. No change needed at this stage.</p>
4.	4698/Gen Mr Harrington	<p>Which item of SPG are you supporting or objecting to?</p> <p>Other (please specify) - not had a look at the survey as yet</p> <p>Please make your response below.</p> <p>i think building of more empty homes in the village is a waste of energy ,not</p>	<p>Looking at the context Welsh Government has issued a statement on 'Second Homes' on the 29th January 2021 outlining existing initiatives:</p> <ul style="list-style-type: none"> - Council tax premiums on second homes - Land Transaction Tax

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>good for the local economy except the builders and planners and we have not got the infrastructure for more people draining the services that we still have</p> <p>Further clarification email received:</p> <p>The Village i refer to is Newport Pembrokeshire. I have seen unaffordable housing built that no local can afford to buy . It has also come to my notice that some people buy these homes and register them as a place of buisness avoiding council tax and getting relief on their homes in the city citing that they are holiday homes when all the time they leave their homes in pembrokeshire empty most of the year or rent them out at great profit to themselves not of any profit too local communities.</p>	<ul style="list-style-type: none"> - Researching the feasibility of monitoring non-domestic rates - Training for local authorities on the compulsory powers in relation to empty homes <p>The statement refers:</p> <ul style="list-style-type: none"> - to a range of questions that need to be solved. - The need to consider the recommendations from Dr Simon Brooks' research and the need for further action. - Welsh Government commissioning further research to qualitatively assess interventions elsewhere. What are the impacts? - To the need to understand the data around 'second homes' which encompasses a myriad of property issues. - To developing a new methodology for understanding housing needs. - Exploring the potential for a statutory registration scheme for holiday accommodation. - Exploring the reforming of local government finance. <p>The commitment is to continue to explore this work programme in the next Senedd term (election results pending). The National Park Authority would need to reflect on the outcome of these initiatives.</p> <p>Officers are engaged with the issue at a national level. We are part of a Rural Housing working group, facilitated by Welsh Local Government Association, which focussed greatly on second homes and holiday lets. The recommendations of that group were put to the Welsh Local Government Association rural forum, where they were accepted and are to be raised with Welsh Government. In addition to this the 3 National Parks have been meeting with Welsh Government officers, including the recently appointed a Head of Second Homes Policy Officer, in order to feed into their considerations and these</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
			<p>meeting are to continue as the momentum grows.</p> <p>Officers of the Authority have also been invited to liaise with Pembrokeshire County Council to look at issues locally. This Authority is responsible for planning only within the National Park.</p> <p>Also it might be useful to note for information that the issue of second homes and a policy response of local needs housing was debated in detail at the recent Local Development Plan Examination. The Authority's paper on the issue of local connections policies is available to view on the Authority's website.</p> <p>Such a policy was not included in the Local Development Plan. Some sustainability appraisal monitoring indicators were included as an outcome.</p>
	Archaeology (Joint)		
5.	4689/Arch Dyfed Archaeological Trust – Development Management	<p>I've looked through the draft SPG, which looks generally fine, and just have the following few comments/suggestions:</p> <p>25.Where insufficient information has been provided, the planning authority can decide refuse to grant planning permission. Just a typo –'to refuse'?</p>	Para 25 change proposed: Agree.
6.	4689/Arch Dyfed Archaeological Trust – Development Management	65.Historic Environment Appraisal We rarely, if ever, recommend an appraisal nowadays. I think these were introduced as a way of dealing with the influx of wind turbine applications a few years ago. I suggest removing this paragraph to avoid confusion with desk-based assessments.	Para 65 change proposed: Agree.
7.	4689/Arch Dyfed Archaeological Trust – Development Management	66.Where there is good reason to believe that an application site has significant archaeological potential and information is currently inadequate, the planning authority may direct the applicant to provide a desk-based assessment prior to the determination of an application. I suggest that this is reworded to say 'where there is good reason to believe an application site may have an adverse impact on the historic environment'. The significance	Para 66 change proposed: Agree.

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		of this impact will be confirmed by the assessment.	
8.	4689/Arch Dyfed Archaeological Trust – Development Management	68. The main types of geophysical survey currently being used are magnetometer survey and ground penetrating radar. Perhaps Resistivity Survey should be added here.	Para 68 change proposed: Agree.
9.	4689/Arch Dyfed Archaeological Trust – Development Management	71. In each area sufficient excavation will normally be undertaken to ensure that the natural horizons are reached and proven. An evaluation will excavate deposits to the top of the archaeological horizon or the top of natural horizons – whichever is reached first.	Para 71 change proposed: Agree.
10.	4689/Arch Dyfed Archaeological Trust – Development Management	72. advice should be sought from the Dyfed Archaeological Trust, who can recommend a form of recording appropriate to circumstances and national standards. Typo on 'Archaeological' and I suggest this should again refer to the Development Management section of the Trust. I hope this helps – let me know if you require further information.	Para 72 change proposed: Agree.
11.	4213/Arch Natural Resources Wales	• Historic Environment (Archaeology) Archaeology is outside of Natural Resources Wales' remit and therefore have no comment on the above SPG.	Comment noted. No change needed.
12.	4697/Arch Mr O'Brien	<i>Officer summary of representation</i> A detailed submission is provided – see Appendix B to this report. The issue relates to how the commentator considers the settings of Scheduled Monuments are considered in the County Council application process. The request is for 'change behaviour' alongside any necessary change to processes. Two case studies are included to support the requested change.	The representation appears to reflect a misunderstanding concerning the purpose of the Supplementary Planning Guidance, which is designed as a user friendly signposting document and guide to archaeology in the planning process. It is the primary legislation, secondary legislation and other Welsh Government documents that should be referred to understand in detail what is required and these are all signposted in the document. No change proposed.
13.	1095/Arch Lichfields on behalf of Bourne Leisure	Name of SPG item: Archaeology Object: Paragraph 3 "Supplementary Planning Guidance does not form part of the two Local Development Plans, but when adopted has significant weight in deciding whether a proposal can receive planning permission." (Lichfields emphasis)	The 'Introduction' to the Supplementary Planning Guidance has been reviewed to ensure consistency with Welsh Government's Development Plan Manual 3 Chapter 9: Supplementary Planning Guidance. This has resulted in edits to paragraphs 3, 4 and 5

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Chapter 9 of the Development Plans Manual (Edition 3) (DPM) states that “Only the policies in the adopted development plan have special status under section 38(6) of the PCPA 2004 in deciding planning applications. However, Supplementary Planning Guidance (SPG) can be taken into account as a material consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight.”</p> <p>Whilst it is recognised that only limited weight can be given to SPGs that have not followed the steps set out in the DPM, it is not automatically the case that significant weight is given to an SPG where these procedures have been followed. It is for the decision maker to decide the weight to be given to the SPG.</p> <p>To ensure consistency with Chapter 9 of the DPM, we suggest that the word “significant” is removed from Paragraph 3. This will ensure that the weight awarded to the SPG is for the decision-maker to decide when determining planning applications, reflecting national policy and guidance. Bourne Leisure therefore proposes the following amendment to Paragraph 3: “Supplementary Planning Guidance does not form part of the two Local Development Plans, but when adopted has significant weight in deciding whether a proposal can receive planning permission.” (proposed amendment with strikethrough)</p>	<p>which should address the issue raised.</p>
	<p>1095/Arch</p> <p>Lichfields on behalf of Bourne Leisure</p>	<p>Paragraph 40</p> <p>Paragraph 40 of the SPG states: “The planning authority is required to consult with Cadw (acting on behalf of Welsh Government) on any application likely to affect a scheduled monument or its setting. A planning application which adversely affects a scheduled monument will normally be refused.”</p> <p>Bourne Leisure does not object to the principle of protecting scheduled monuments and their settings. However, the Company is keen to ensure that any such considerations are in accordance with national planning policy and guidance.</p> <p>Paragraph 4.2 of the Planning Policy</p>	<p>Paragraph 40 has been edited to meet the concerns raised.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Wales Technical Advice Note 24 (TAN24): The Historic Environment (2017) states that “When considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains (see Annex A).”</p> <p>To ensure consistency with Paragraph 4.2 of TAN24, Bourne Leisure proposes the following amendment to Paragraph 40:</p> <p>“The planning authority is required to consult with Cadw (acting on behalf of Welsh Government) on any application likely to affect a scheduled monument or its setting. A planning application which adversely affects a scheduled monument <u>would have a significant adverse impact to or within the setting of a scheduled monument</u>, will normally be refused.” (proposed amendments underlined and with strikethrough).</p> <p>This proposed amendment will ensure that planning applications which may have a significant adverse impact on the setting of a scheduled monument are considered against the requirements of TAN24.</p>	
	Biodiversity (Joint)		
14.	0/Bio Officer	Propose inclusion reference to the protection of peat soils.	<p>Natural Resources Wales has been consulted on this suggestion and this is supported in principle. Suggested edits are proposed (to the proposed new appendix) which are agreed and are reflected in Appendix C to this Committee Report.</p> <p>It is proposed that Biodiversity Supplementary Planning Guidance be amended by adding a short paragraph that cross refers to a new Appendix containing guidance on peat. It is suggested this is added after the ‘SuDS section’ (paragraphs 62 to 64).</p> <p><i>‘Peat:</i></p>

Rep No.	Reference	Representation	Officer Response and Recommendation
			<p><i>Peatlands hold large stocks carbon and excavation of peat will result in large carbon losses from the excavated peat and also the areas affected by drainage. Appendix X provides more advice on peat management procedures with the aim of preventing disturbance in the first instance.'</i></p> <p>Also the Authorities' Constraints layer would be amended to include the peat layer from Lle: Lle - Unified Peat Map of Wales (gov.wales)</p> <p>The layer on the National Park Authority's website can be found here: Pembrokeshire Coast National Park Authority: (arcgis.com).</p> <p>A footnote will be added to the paragraph above in the Supplementary Planning to advise where the peat layer can be accessed and to advise: <i>'That this layer should be used with some caution as there still may be areas of deep peat that are not shown and areas that are shown as deep peat that may not be. As a precautionary approach, where deep peat is suspected a peat survey should be undertaken.'</i></p> <p>It is worth noting that Natural Resources Wales are currently working on peat survey guidance.</p> <p>The new Appendix to the Supplementary Planning Guidance can be viewed in Appendix C to the Committee Report.</p>
15.	0/Bio Officer	On the Biodiversity SPG we think we need potentially a cross-reference in somewhere to the new NRW guidance on phosphates.....	<p>It is proposed to insert text under the International, European and UK legislation under paragraph 19 under the Habitats Regulations 2017.</p> <p>Text:</p> <p>'Natural Resources Wales Planning Policy Guidance on Water Quality in Riverine Special Areas of Conservation (SAC)</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
			<p>In January 2021 NRW published an assessment of phosphate levels in Riverine SACs in Wales. The assessment showed a failure to meet targets in the Dee, Cleddau, Wye, Teifi and Usk.</p> <p>Alongside this data NRW published a Planning position statement and Interim guidance which should both be considered by applicants for proposals within the catchment or which impact on the waterbody of a Riverine SAC. More information is available via the PCC website:</p> <p>https://www.pembrokeshire.gov.uk/planning-and-ecology/phosphates-guidance-from-national-resources-wales</p>
16.	4213/Bio Natural Resources Wales	<p>• Biodiversity We welcome and support the submitted SPG and offer the following comments.</p> <p>Table 1. Protection of Sites – Following the changes made to the Conservation of Habitats and Species Regulations 2017 (as amended), Special Areas of Conservation (SAC) and Special Protection Areas (SPA) are now known collectively as the national site network. Any reference to Natura 2000 sites should be amended accordingly.</p>	Agree to amendment proposed regarding references to the National Site Network. Amendment done in Tables 1 and 2 and Appendix 1.
17.	4213/Bio Natural Resources Wales	Paragraphs 47, 72 and 73 - We welcome the emphasis on the enhancement of biodiversity throughout the document.	Support noted.
18.	4213/Bio Natural Resources Wales	Paragraph 28 – Reference is made to Paragraph 54 in respect of licensing, it should be amended to Paragraph 57.	Agree to correct referencing. Note further edits to the document may change the paragraph number. An automated cross reference has been inserted.
19.	4213/Bio Natural Resources Wales	Paragraph 29 – We advise removing reference to particular species, all species should be considered unless scoped out.	Amendment regarding removing reference to particular species agreed.
20.	4213/Bio Natural Resources Wales	Paragraph 42 – It is stated ‘A proposal must show how it has been designed in such a way so as to minimise any adverse effects..’ we recommend this wording is amended to include avoid or minimise any adverse effects, in line with Paragraph 44.	Amendment regarding the wording of this paragraph is agreed.

Rep No.	Reference	Representation	Officer Response and Recommendation
21.	1095/Bio Lichfields on behalf of Bourne Leisure	<p>Paragraph 25 of the Biodiversity SPG states: “This section considers how biodiversity is best protected and enhanced through the development management process. There are three key elements to this: • Providing accurate information with the planning application on the existing status of habitats or features and the presence of plants, invertebrates, amphibians, reptiles, birds or mammals (including bats) on or adjacent to the proposed development site. • Where it is known that a protected or priority species or habitat is present, ensuring that assessments are undertaken to identify the potential impact(s) of the proposed development on them, so as to inform the planning process. • Where such assessments demonstrate that species or habitats would be adversely affected, ensuring the development proposal is modified, to avoid the destruction or damage of sites used by protected species and/or to mitigate/compensate any potential impact.”</p> <p>Bourne Leisure endorses the approach set out in Paragraph 25 as it is practical and recognises that mitigation and compensation for biodiversity is sometimes needed. This is consistent with Planning Policy Wales (Edition 10) which states: “Planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible.” (paragraph 6.4.21)</p>	Support noted.
22.	1095/Bio Lichfields on behalf of Bourne Leisure	<p>Paragraph 55 Paragraph 55 of the Biodiversity SPG states: “Examples of the use of planning obligations for major developments may include:</p>	The general guidance is that LPA's should seek to overcome planning objections, where appropriate, or secure mitigation by condition rather than by s.106 obligations – this is set out in paragraph 4.21 of Welsh Government Circular WGC 016/2014. The Circular does note that there are

Rep No.	Reference	Representation	Officer Response and Recommendation
		<ul style="list-style-type: none"> • Provision of access and interpretation of facilities for areas of biodiversity interest / feature; • Provision of new habitats; ...” <p>The “provision of access and interpretation of facilities for areas of biodiversity interest / feature” is not considered to be a requirement sought through a planning obligation, as Paragraph 55 denotes.</p> <p>Instead this should be delivered by way of a planning condition.</p> <p>The Welsh Government Circular ‘The Use of Planning Conditions for Development Management’ (ref. WGC 016/2014) sets out that planning conditions should be used in preference to planning obligations, with Paragraph 4.21 of the Circular stating that “Local planning authorities should seek to overcome planning objections, where appropriate, or secure mitigation by condition rather than by a planning obligation.”</p> <p>There is no reason why such infrastructure cannot be delivered by condition.</p> <p>The following amendment to Paragraph 55 of the SPG is proposed:</p> <p>“Examples of the use of planning obligations for major developments may include:</p> <ul style="list-style-type: none"> • Provision of access and interpretation of facilities for areas of biodiversity interest / feature; • Provision of new habitats; ...” <p>(proposed amendment with strikethrough)</p> <p>The proposed amendment will ensure that the local planning authorities are adopting appropriate guidance as to what planning obligations they may seek for major developments. Of course, the authorities may wish to consider adding the provision of access and interpretation of facilities as an example of mitigation and/or enhancement elsewhere in the document.</p>	<p>some matters which are more appropriately required through a planning obligation and should not be required in a condition, although the examples given are transfers of land or payments to the Local Planning Authority.</p> <p>However, it is noted that paragraph 5.81 of the Circular says that “there are certain sites where any conditions or obligations affecting them will need to be consistent with the provisions applicable to their protection”, and directs the reader to TAN 5 for further advice. It is considered that this can be interpreted as meaning that the general guidance on the use of conditions (and s.106 obligations) should be read in the context of the specific guidance contained in TAN 5.</p> <p>Paragraph 4.7.1 of TAN 5 acknowledges the general position (i.e. the preference of using conditions over s.106 obligations), but notes that “in many circumstances, for nature conservation matters, obligations provide a more flexible, but equally reliable and enforceable means of controlling development than conditions”. It also notes that they are particularly useful to, among other things, “ensure proposed natural heritage benefits are delivered in a timely and appropriate way, where these have been material considerations in the planning decision” – this is essentially what the particular part of the Supplementary Planning Guidance relates to. This guidance in TAN 5 therefore provides a justification for imposing s.106 obligations for specific purposes relating to nature conservation.</p> <p>Paragraph 4.7.2 includes the following (among others) as examples of matters that obligations may be appropriate for providing:</p> <ul style="list-style-type: none"> • information and interpretation, for example, about the geological interest of a site or feature; • improved access for all to sites or features of nature conservation interest.

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			<p>This broadly covers the part of the SPG which the representation received takes issue with i.e. "Provision of access and interpretation of facilities for areas of biodiversity interest / feature".</p> <p>It is also worth noting that the model conditions in the Conditions Circular do not include conditions dealing with the specific matters in question i.e. access to and interpretation of areas of biodiversity interest (albeit model conditions 125 – 127 do relate to other aspects of wildlife and habitat protection). When taken with the specific guidance in TAN 5, this could also be used to argue that conditions are not necessarily the way in which matters in question should be dealt with.</p> <p>Therefore, whilst there is probably an argument that this could be dealt with by condition provided it was carefully worded, given the specific guidance in TAN 5 there is a reasonably strong argument to justify continuing with the approach set out in the Supplementary Planning Guidance by dealing with it through a s.106 obligation instead.</p>
23.	3468/Bio Campaign for the Protection of Rural Wales	<p>...Comment</p> <p>We support the protection and enhancement of Biodiversity but unless we have tight conditions in place on planning consents and good monitoring and quick enforcement it won't be delivered.</p> <p>We are disappointed at the lack of enforcement of conditions on consent by the County Council some of which directly relate to biodiversity provision. We hope you fare better.</p>	<p>The comment on enforcement is noted. No change to the guidance is needed in response to this. Pembrokeshire County Council will contact CPRW to investigate the comment around a lack of enforcement on conditions relating to biodiversity.</p>
	Parking (PCNP only)		
24.	3950/Parking Welsh Government Network Management Division	<p>For the Parking SPG particularly, we note an emphasis towards enabling Active Travel, a points system for parking requirements and the clause as part of Policy 59 that protects our position with regard to new</p>	<p>Comment noted. No change needed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
	Transport	development transport impacts being mitigated.	
25.	4213/Parking Natural Resources Wales	<ul style="list-style-type: none"> • Parking Standards Due to the subject of the SPG we have no comment to make.	Comment noted. No change needed.
26.	3468/Parking Campaign for the Protection of Rural Wales	<p>...Comment</p> <p>With the advent of more home holidays many local beaches are able to sustain more people than the local car parking can accommodate. While there is a move to get people to walk, use public transport or cycle to beaches the roads are often too dangerous to use and public transport is often not available or not convenient.</p> <p>If you promote railways please be aware that stations like Manorbier and Saundersfoot are not convenient to the beaches given the distance, and the often congested, dangerous and narrow roads to access them. There is also the long and toilsome uphill walk to the stations after spending a day on the beach.</p>	Comment noted. No change needed.
	Caravan & Camping (PCNP only)		
27.	4695/Camping Mr Oeppen	<p>Object to Caravan camping and chalet SPG</p> <p>...I would like to object to this SPG draft guidance as I feel the use of Landscape Character Areas whilst beneficial in determining the qualities and features worth of preservation in each area, should not be used to make definitive judgements on the suitability of a proposed development in an area. This I feel should only be done on a case by case basis. I farm and manage the land at Amroth Castle Farm and we have been organic and in Glastir for the last 6 years and have created kilometres of hedging, tree planting and screening work which has enhanced the farm and the quality of the area. Our business plan for the next 5 years involves farm diversification into a meat cutting room to process and market our own organic beef and lamb and the creation of seasonal, non-permanent glamping, to be integrated into the food marketing</p>	<p>All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context. The purpose of the Supplementary Planning Guidance is to provide more detailed guidance on the way in which the policies of the Plan will be applied – in this case, primarily Policy 41, although applications are also considered against all relevant policies of the Local Development Plan, national planning policy and other relevant documents.</p> <p>The adoption of the Supplementary Planning Guidance will not prevent applicants from making planning applications linked to their farm and this Supplementary Planning Guidance relates to camping, caravanning and chalet development only. Other forms of development will be considered against the relevant</p>

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		<p>side of the operation. We also have a redundant farm building which we would like to possibly convert into Bunk House accommodation to make use of Amroth's iconic position at the start/finish of the coast path and which could be an asset to the life of the Park as there is no bunk house accommodation East of Manorbier at present. As the guidance stands, although the new Plan is favourable towards Farm Diversification we would be excluded from applying to make use of our land for any sort of accommodation to support my family and the farm. We would be excluded from sources of funding such as Welsh Assembly Tourism Investment Scheme and other grant monies available to nearly all farmers in Wales. I am familiar with Landscape Character Assessment through my Master's degree in Landscape Ecology, Design and Management where it was a core element and I did my Master's Dissertation on suitable sites for woodland planting around the Daugleddau. I then worked for Land Use Consultants, who were instrumental in designing much of the nationally accepted Landscape Character Assessment methodology and worked on Landscape Character Assessment for them in Jersey and in other projects. Whilst I recognise the utility of Landscape Character Assessment I do not believe it is sensitive enough to be able to inform planning decisions at a Micro level or to be used to completely exclude applications in some Character areas. There is too much variety within individual Character areas for that to be fair. We have areas of the farm that are completely screened from sea views, and any public view in Amroth. The nature of the Glamping market lends itself to sites with a degree of isolation I would content that it is unfair and discriminatory to exclude all seasonal. We have areas of the farm which are completely screened from sea views and from any public view in Amroth. The ethos and appeal of many of the new types of glamping accommodation often centres around a degree of isolation and seclusion. Whilst I welcome the new plan's</p>	<p>policies of the Local Development Plan and any Supplementary Planning Guidance produced by the Authority.</p> <p>Paragraph 4.5 of the document relates to the landscape assessment providing a broad context for considering proposals and states the need for sites to be considered on a case-by-case basis.</p> <p>The variations within each landscape character area has been identified through highlighting the detailed key sensitivities. These not only reflect visual impacts but the need to protect the natural and historic environment, the importance of protecting undeveloped areas (whether publicly visible or not) and tranquillity – elements which make up the special qualities of the National Park (see Policy 8 of Local Development Plan 2).</p> <p>The request to amend the wording in the section of the document relating to Landscape Character Area 1 is noted. However the text reflects the findings of the study. Paragraph 4.5 of the draft Guidance advises that the assessment provide a broad context for considering proposals and the need for individual sites to be considered on a case-by-case basis within that.</p> <p>With reference to the comment relating to St Brides Bay on page 10 of the draft Supplementary Planning Guidance, the guidance there has been produced in the context of identifying the variation of existing concentrations of caravan and camping developments in that area. Each of the landscape character areas is dealt with, in detail, in the Supplementary Planning Guidance and the differing nature of the landform and other considerations results in the capacity of each area to absorb further development. The elements in combination give the results – rather than a quantitative approach based on the number of existing sites.</p>

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		<p>recognition of Glamping and the evolving market, I feel it could go further in supporting the environmental benefits of some of the new types of Glamping. We would be able to provide Glamping on a seasonal low impact basis on our land with no visual impact. This would help fulfil the Park's role of supporting appropriate farm diversification and fostering the social and economic well being of local communities, but the current guidance would not allow us to pursue this option and may affect the viability of the farm.</p> <p>Whilst I accept that views of caravan sites from the sea around the Saundersfoot Character Area can detract , as on page 11, the photo also illustrates the well wooded nature of the coastal strip from Hean Castle to Amroth. I do not accept that no further, small scale development, of a seasonal Glamping nature could be accommodated in that area, but could in some more open Character Areas. Driving from New Inn to Coppet Hall, via Wiseman's Bridge because of the amount of woodland and the landform you do not feel like the area is completely at saturation point with caravans.</p> <p>The option of using exempted organisations is not always possible - Greener Camping Club will not take on more clients in certain areas of Pembrokeshire and other organisation are oversubscribed or not suitable for Glamping. I would be disappointed and feel failed by the park's new guidance if it precluded us completely from pursuing our farm business plan. I would appeal to the Park to change its wording to on page 32 from "there is no further capacity for more sites" to there is "very limited further capacity for new sites." so that at least applications could be judged on a case by case basis.</p> <p>On page 10 the Park has recognised that caravans are a significant issue around St Brides Bay - an area of much more open land form than Saundersfoot Settled Coast, but has stated that there may still be some capacity for new sites - "There may be limited capacity for small static sites</p>	<p>The study forming the basis of the Supplementary Planning Guidance took into account existing camping, caravan and chalet sites (2015). With particular reference to the Saundersfoot Settled Coast Landscape Character Area, the guidance details opportunities to reduce the impact of the existing sites through changes of accommodation type (e.g. static caravans to pods or glamping tents) or where an extension to the site can allow pitches to be relocated to less visually prominent areas.</p>

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		<p>and medium and small seasonal sites back from the coast."</p> <p>I feel that unless the Park would agree to at least look at farm diversification involving Glamping in Saundfoot Settled Coast it is not being consistent and fair to its guiding principles. On page 10 the Park accepts that Glamping accommodation can be limited in impact - "Camping options such as yurts, tepees and pods form a very small proportion of the overall number of existing units and tend to be small scale. Where they are located carefully they can fit satisfactorily..."</p> <p>To be precluded from at least presenting the case for a site within this character area means would I feel be very hard to take.</p> <p>Would it be possible to have an explanation as to why if I already owned a site there may be "very limited capacity for extending some static caravan sites where the extension is less prominent..." in the Saundfoot Settled Coast area, but if I wanted to be a new entrant and set up a seasonal Glamping operation with no permanent features, I would be unable to as the guidance stands ?</p> <p>Why would my development be weighted in such a way that it would be against planning but an existing site owner would possibly be able to extend. This would seem to go against Welsh Assembly efforts to encourage innovation and new entrants to farming and tourism. When we took on Amroth Castle Farm we were able to access the Young Entrants to Farming Scheme. Business Wales and the Welsh Assembly Rural Development Schemes support new entrants to farming and tourism but the planning guidance as it stands seems to have a presumption in favour of existing owners over new entrants. This does not seem fair.</p> <p>Although I am raising this matter because the guidance as it stands has an impact on my own family and business I am also seeking to make the wider point that the character areas should inform planning policy but should not exclude any application being considered on a case by case basis.</p>	

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		Please do not hesitate to contact me if you would like to discuss my concerns.	
28.	4213/Camping Natural Resources Wales	<p>• Caravan Camping and Chalet Development</p> <p>We welcome and support this well considered SPG.</p> <p>2.6 - To confirm, GLVIA3 does not refer to 'intrinsic value', rather, value is based on designations and other recognised landscape and visual values, as set out in GLVIA3.</p> <p>3.1 h) - We suggest that white/cream static caravans can also be intrusive on the skyline, as illustrated on Page 13. All such developments can be intrusive against the skyline.</p> <p>General comment – With regard to improving existing sites we encourage changes in colour to statics and yurts/safari tents away from white/cream towards recessive colours such as olive/mid green with dark grey roofs for statics and natural timber.</p>	<p>Support noted.</p> <p>Agree to change proposed – It is proposed to delete reference to 'intrinsic value'.</p> <p>3.1h) and general comment – It is agreed that caravans located along a skyline can be intrusive, irrespective of the colour. Where possible (through consideration of planning applications to make changes within existing sites) opportunities to mitigate the impact of existing developments, whether this is through controlling the colour of units or introducing additional landscaping, for example are fully explored and this is set out in the siting guidance for many of the Landscape Character Areas and the general siting guidance in Appendix B of the supplementary planning guidance. Each application will need to be considered within its individual locational context.</p>
29.	4691/Camping Mr J Coles	<p>There should be a complete moratorium on further caravan developments in the Pembrokeshire Coast National Park.</p> <p>Existing transport infrastructure is already incapable of handling the volume of traffic entering Pembrokeshire during the seasonal holiday peaks. The proposal made seeks only to shift the problem elsewhere around the County.</p> <p>Due to the effects of leaving the European Union and the coronavirus pandemic, it is possible there will be an increase in demand for 'staycations'. That does not mean that Pembrokeshire should provide more caravan parks for visitors to cash in. There is already an oversupply of caravan parks at the expense of other forms of accommodation.</p> <p>The Park Authority should, as far as possible, encourage the use of alternative commercial holiday lets with Pembrokeshire's existing tourist accommodation offer.</p> <p>Publically available data shows a significant proportion of holiday</p>	<p>The policy position guiding caravan developments is contained in Local Development Plan 2 and provides the context within which applications for such proposals will be considered. The Plan was adopted in September 2020 following full scrutiny through public consultation and examination by an independent Planning Inspector. The policy cannot be amended through the Supplementary Planning Guidance consultation process.</p> <p>The Supplementary Planning Guidance provides additional detail for applicants to provide further explanation of the terminology and how the application will be applied.</p> <p>There is a range of visitor accommodation in the National Park, including a significant number of commercial holiday lets. Further detail relating to the types and prevalence of accommodation can be found in the Enjoyment Background Paper to the Local Development Plan - Enjoyment Background Paper.</p>

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		accommodation in Pembrokeshire is unoccupied even during peak season. That suggests an existing oversupply which allowing further development will only exacerbate.	No change is proposed in response to this comment.
30.	4696/Camping Jones	<p>Hello,</p> <p>We're aware that public consultation on this documentation closes today. Please can we make the following comments:</p> <p>Our static holiday park and campsite – Llanungar Caravan and Camping (SA626FG) – falls into LCA17 according to the development plan. We are located between Solva, Nine Wells and St Davids Airfield/Whitchurch, at least 2 miles from the boundary of the city of St Davids. Upon reading the characteristics of the LCA17, we do not believe this fits with our location on the outskirts of Solva and would ask that the LCA we fall into is reviewed.</p> <p>Thank you for your consideration, we look forward to your response.</p>	<p>The landscape character areas are based on extensive work to systematically assess landscape character, developed by the Countryside Council for Wales (now Natural Resources Wales). The maps initially uploaded to the National Park Authority website accompanying this interim Supplementary Planning Guidance had become distorted when viewed and it was difficult to establish the location of individual sites. This was rectified shortly after the start of the consultation period. The maps show that Llanungar Caravan and Camping site lies within Landscape Character Area 18 which wraps around area 17 to the west and east.</p> <p>No change required.</p>
31.	3468/Camping Campaign for the Protection of Rural Wales	<p>The National Park is inclusive of all, including people with little means therefore we look to the NP to make sure that caravan parks are not upgraded to such an extent that they are outside the purse of poorer people. , . Coastal sites should not be improved or upgraded to the extent that they are for the wealthy visitors only.</p>	<p>The policies contained in the Local Development Plan allow for consideration of a range of visitor accommodation types throughout the National Park. The Authority cannot control the pricing strategy of any particular operator – nor would it be appropriate to do so.</p>
32.	4302/Camping Mr Whitby	<p>This note comments on the PCNP Caravan, Camping and Chalet SPG 1.5.</p> <p>I think this paragraph does not represent the purposes of the Authority properly, The Authority has a duty to protect the special qualities of the Park, and must give greater weight to this duty than any other. The Authority merely has to show 'due regard' to fostering local economic well-being. Its decisions are not a matter of 'balancing' competing interests</p> <p>Your LDP references the Sanford Principal, (the absolute duty to protect the Park landscape from harm) which is an even stronger directive (to protect</p>	<p>Agree that paragraph 1.5 should be amended to better reflect the twin Purposes and the duty of the National Park Authority and to clarify the position of the guidance in the case of new development.</p>

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		<p>the landscape etc) than the duty under the 95 Act.</p> <p>Quote:</p> <p>'This guidance seeks to assist the National Park Authority in guiding existing, and possibly new, caravan, camping and chalet development to achieve this balance.'</p> <p>The guidance is designed to inform and guide decision-making. It applies to both existing and proposed developments (Why 'possibly'?)</p> <p>I feel this entire paragraph (1.5.) could be made rather clearer.</p>	
33.	4302/Camping Mr Whitby	I found sections 2 (Method including definitions) and 3 (Overview) clear and helpful.	Support noted.
34.	4302/Camping Mr Whitby	<p>Section 4: Summary of recommendations for Landscape Character Areas</p> <p>4.1.</p> <p>I have some concern about the idea, implied in 4.1. that the coastal strip and the area of the Preseli Hills should be afforded special protection. I understand this approach, but the entire area of the Park is protected and all parts should, in practice, be treated equally.</p> <p>One particular problem with is approach is that, if an area is treated as less 'sensitive' and development is allowed, this development tends to make it even less 'sensitive', allowing further development, further degrading the quality of the area.</p> <p>You partially address this issue at 2.12. (suggesting where areas are at capacity, the Authority should concentrate on enhancement). I think this approach (enhancement and repair) should be emphasised. There should be a clear policy that where existing sites which are found to be intrusive and harmful to the special qualities of the Park, the Authority will always take measures, where it can, to mitigate this harm.</p>	<p>Policy 41 of the Local Development Plan (LDP2) sets out the policy context for considering camping, caravan and chalet developments and directs such developments away from the coast, Preseli Hills and locations inter-visible with them. The reason for this is the adverse visual impact that this type of development is likely to create when seen alongside the existing predominance of sites overlooking the coast.</p> <p>In principle to continue with this historical approach would cause adverse impact on the National Park's special qualities.</p> <p>The application of planning policy directs development to appropriate locations where the ability to accommodate some further development (without causing adverse impact) is feasible in principle. Sensitivity is taken to mean the extent to which a landscape character area can accommodate a particular type and scale of change without adverse effects on the character.</p> <p>The nature of the particular development is highly relevant in making these decisions.</p>

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		<p>You will also note that developers refer to the fact that a site is set back from the coastal strip to support an application, suggesting that the area is necessarily somehow 'less sensitive'. I think your guidance should make it clear that this is not the case.</p>	<p>With regard to the enhancement of existing sites, this is an approach regularly taken by the Authority where opportunity allows. We are not able to change policy through the Supplementary Planning Guidance consultation process as that can only be done through formal review of the Local Development Plan. Policy 41 of the Plan does, however, include a criterion requiring proposals to achieve an overall enhancement with clear benefits in reducing the impact on the surrounding landscape. The Authority can only take such action when applications to alter the area or accommodation type within existing sites are submitted for consideration.</p> <p>In response to the comment on the information that developers may submit – each application will be considered on its own merits and there may be sites set back from the immediate coastline that meet with the policies of the Local Development Plan as supported by the Supplementary Planning Guidance. The intention is to assess the impact on the qualities of the National Park rather than use a blanket geographical approach to controlling this type of development. The Authority has a duty to foster the socio-economic well-being of communities pursuant to the National Park purposes.</p> <p>No change required.</p>
35.	4302/Camping Mr Whitby	<p>4.2</p> <p>One problem with using the existing Landscape Character Areas is that a single area can include areas with quite different levels of existing development. For example the east and north of LCA 20 (Trevine) is essentially undeveloped, whereas the western part has a higher level of development. The guidance mentions this. However the guidance specific to LCA 20 relates to the whole of the area. I feel there may be a case for offering different guidance for the different parts of the same LCA.</p> <p>However, I accept you address this issue, in part, at 4.5.</p>	<p>Most of the Landscape Character Areas have areas of developed and undeveloped land to varying degrees. The siting and mitigation guidance for LCA20 provides additional tailored guidance which seeks to protect areas sensitive to camping and caravanning developments.</p> <p>No change required.</p>

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36.	4302/Camping Mr Whitby	<p>5 Landscape Character Areas Sensitivity and Capacity Assessments</p> <p>I have not studied the items in this section in detail, other than those referring to LCA 20 and 21. However the general principals seem to me to be sound.</p> <p>LCA 20</p> <p>You say:</p> <p>Summary of Capacity: There is very limited capacity for new sites. As any new development would be likely to be noticeable it would be limited to small/medium seasonal sites in discreet locations only.</p> <p>I think this is confusing. You seem to suggest that capacity is limited because new development would be likely to be 'noticeable'. If a developer could show that a proposal was not likely to be 'noticeable', then there would, arguably, be 'capacity' for the proposal, including a proposal for static accommodation.</p> <p>You could simply say: There is very limited capacity for new sites. Any new development would be likely to be limited to small/medium seasonal sites in discreet locations only.</p> <p>Guidance specific to the LCA</p> <p>I presume this guidance relates principally to any new development of small to medium seasonal sites.</p> <p>There is implied, though perhaps not specific guidance, that sites should be associated with existing dwellings ('farm complexes'), that is, within enclosures near such existing buildings, and not 'spill out into adjacent fields'.</p> <p>However, there is a trend to offer pitches which give a level of privacy and a sense of remoteness which can involve sites being fairly extensive. If developments within the Park are not to spill out into adjacent fields and remain associated with existing</p>	<p>Agree that the text could be clarified and suggest that the second sentence under 'Summary of Capacity' in Landscape Character Area 20 be amended. (See proposed edits in -Appendix C).</p> <p>The same amendment will be required to the sentence under 'Capacity for New Sites'.</p> <p>The guidance does advise siting camping, caravan and chalet developments close to farm complexes and other development. When considering planning applications for such development the location, size of the site and distribution of pitches within the site are all elements considered within the context of the Local Development Plan as a whole and the guidance to support the Plan set out in this Supplementary Planning Guidance.</p> <p>10 – The guidance for this Landscape Capacity Area (20) does seek to prevent new static caravan development. The statement highlighted in the representation may, however, relate to the re-configuration of existing static sites and is therefore an important element of the siting guidance.</p>

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		<p>buildings, this can only be achieved by developers agreeing confine the site to a particular enclosure and limit the number of pitches available.</p> <p>You say:</p> <p>10. Avoid siting static units in or in the setting of Conservation Areas, scheduled ancient monuments and listed buildings and their curtilages.</p> <p>This provision relates to 'static units', a type of development the guidance has already indicated is likely to be inappropriate in this LCA. By including this provision, it is implied that, outside the areas indicated (setting of Listed Buildings, etc), static units might be considered. The is not really helpful, and I don't think you need to include this provision</p> <p>In this provision I read one 'in' as 'on' and 'buildings and their curtilages' as 'buildings or their curtilages'.</p>	
37.	4302/Camping Mr Whitby	<p>Other Matters</p> <p>At 1.3. you say that matters relating to the licensing of sites are outside the scope of the SPG.</p> <p>I refer now to the issue of Exempt Organisations, which you refer to in the photographs at 3. Overview of issues and sensitivities.</p> <p>The final picture shows 'Apparently informal camping at Strumble Head' (LCA 21). I understand this development is now a certificated 'Greener Camping' site (initially it was a Caravan and Camping Club site). The site is advertised as allowing camping over an area of over 22 acres and includes 4 yurts.</p> <p>The site is within the setting of a scheduled Ancient monument, within a Cadw Listed Landscape and extends onto access land.</p> <p>I am advised that you have no control over the Exempted Organisations, though strictly, this is not the case (amongst other things, you are consultees on application).</p>	<p>Comments are noted. The scope for camping sites to operate outside planning control is a matter of concern for the National Park Authority and the Authority is liaising with Welsh Government and other bodies to highlight the issue. The application of the Supplementary Planning Guidance relates only to those sites seeking planning permission and so no changes are required in response to this comment.</p> <p>No change required.</p>

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		<p>The yurts appear to have solid floors, some external hard standing and small associated outbuildings (kitchens?). Even if the structures are partially dismantled over the winter the issue of whether they are to be considered seasonal or static seems to me debatable.</p> <p>There is another certificated site (formerly Greener Camping) overlooking Abermawr. This is unquestionably seasonal but very evident in the landscape.</p> <p>Greener Camping advises that they can certificate campsites to allow them to operate lawfully without the need for licensing or planning permission. Whilst the Caravan and Camping Club sites appear to operate on quite strict criteria (confined to one enclosure, limited number of camper vans etc) Greener Camping seems promote a more expansive style of camping and some sites offer some form of accommodation (Glamping).</p> <p>The fact that these sites operate without the need for planning consent or any other constraint can they mean they have a significant effect on the quality of the landscape.</p> <p>There are, think, a number of approaches to this issue.</p> <p>The original intention of the Exempted Organisations was to allow people, in caravans, camper vans or bringing tents to enjoy staying in the countryside. If the Exempted Organisations were unable to certify any accommodation provided by the site owner, this type of accommodation might become subject to the planning process. This would be a matter for the Welsh Government, possibly in negotiation with the Exempt Organisations, but might not necessarily involve legislation.</p> <p>It is possible that the existing certification of sites by some of the Exempt Organisations is based on a misconstruction of the law (particularly in regard to the time-limits on</p>	

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		<p>occupation of sites). It might be helpful to have this clarified at some point.</p> <p>Your Authority has the option, where it might consider a particular exempt provision particularly harmful, to apply for an Article 4 Directive.</p> <p>It does seem a little unfair that developers of camp sites who apply to your Authority are so constrained (quite properly) and whilst those that go through the Exempt Organisations are at liberty to do more or less as they wish.</p> <p>You will be aware that the Welsh Government has indicated that it might, at some point, permit overnight camping on Access Land. You will further note that the land between the Coastal Path and the sea is Access Land.</p>	
38.	3457/Camping Friends of the National Park	<p>Comments as follows:</p> <p>The proposed guidance is very thorough and well considered and primarily shows the lack of capacity for further growth in most areas of the National Park. The main pressure is therefore likely to come from expanding, updating and altering existing sites, particularly with the move towards larger modern units and associated facilities.</p> <p>The relationship between this SPG and Policy 41 of the LDP is crucial. Therefore Appendix B – Mitigation and Enhancement Guidance - could be a more prominent and inspirational part of the SPG. Sites planning to expand need to prove a gain in overall biodiversity and environmental enhancement. To demonstrate how this can be meaningfully achieved it would be useful to have more examples of good practice included in the guidance, particularly photographs and case studies.</p>	<p>Comments of support are noted .</p> <p>The whole Supplementary Planning Guidance is intended to provide additional guidance to the policy approach in the Local Development Plan. The Landscape Character Areas are varied and paragraph 4.6 of the document advises that the tailored recommendations listed for each area precedence over the generic guidance set out in Appendix B. It would seem appropriate to move Appendix B into the main body of the text.</p> <p>Recommend that Appendix B of the document is included after Landscape Character Area 28 of the document.</p> <p>The siting and mitigation guidance for each of the Landscape Character Areas set out what needs to be taken into account when considering new sites and making changes to existing sites. Whilst there are some common ideas the range of approaches demonstrates the diversity of the landscape. Some of the photographs shown under paragraph 3.2 of the document show effective mitigation</p> <p>The idea of including more examples of best practice, such as photographs</p>

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			can be considered for future updates of this Guidance.
39.	3457/Camping Friends of the National Park	<p>Providing clear visual guidance as to what is expected and can be achieved would be beneficial.</p> <p>Making clear the links between the different SPG documents would also seem sensible ie between caravans, biodiversity and sustainable design, all of which overlap.</p>	The various policies of the Local Development Plan link to various Supplementary Planning Guidance documents. Some of the Guidance documents relate to a range of Plan policies which may or may not be relevant for any given application being considered. Some cross-referencing is helpful but too much can create confusion and risk relevant guidance being overlooked.
40.	1631/Camping Lichfields on behalf of Bluestone Resorts	<p>Name of SPG item: Caravan, Camping and Chalet</p> <p>Support: Paragraph 2.10 and Paragraph 4.5</p>	Support noted.
41.	1631/Camping Lichfields on behalf of Bluestone Resorts	<p>Paragraph 2.10</p> <p>Paragraph 2.10 of the SPG states:</p> <p>"The sizes of site above act as a broad guide to capacity as there is a spectrum of effects from different types of development on different sites. There may be cases where smaller developments have a greater effect in some locations and slightly larger sites may have less effect in others. Infrastructure associated with different types of development will influence the impact of the development. The effects of individual sites and developments would need to be demonstrated on a case by case basis."</p> <p>Bluestone endorses the guidance at Paragraph 2.10 which enables the effects of individual sites to be considered on a case by case basis. It is imperative that individual sites are considered on a case-by-case basis so that planning applications are considered on their individual merits, taking into account site specific considerations, such as the mitigation measures proposed and the environmental, visual, economic and social benefits of the proposed development.</p>	Support noted.
42.	1631/Camping Lichfields on behalf of Bluestone Resorts	<p>Object: Paragraph 2.12 and General Point (Mitigation Measures)</p> <p>Paragraph 2.12 of the SPG states:</p> <p>"The capacity of an LCA to accommodate further development</p>	The National Park Purposes are set out in the 1995 Environment Act and are fundamental to the management of the National Park. The Purposes and accompanying duty set out the context for the work of the National

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		<p>has to be considered within the parameters of the primary purpose of the National Park. This is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Where there are areas where existing development runs contrary to that purpose it is likely that the capacity for further development is very limited and that the existing development should be improved in order to enhance the area.”</p> <p>As drafted, Paragraph 2.12 of the SPG sets an assumption that where there are areas where existing development runs contrary to the primary purpose of the National Park, it is likely that the capacity for further development is very limited. Bluestone consider that this assumption does not allow for the consideration of the merits of individual sites. Paragraph 2.12 therefore contrasts with guidance elsewhere within the SPG (namely Paragraph 2.10 and 4.5) which states that it is important for sites to be considered on a “case by case basis”.</p> <p>Bluestone therefore proposes the following amendment to Paragraph 2.12:</p> <p>“The capacity of an LCA to accommodate further development has to be considered within the parameters of the primary purpose of the National Park. This is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Where there are areas where existing development runs contrary to that purpose it is likely that the capacity for further development is very limited and that the existing development should be improved in order to enhance the area.” (proposed amendment with strikethrough)</p> <p>Paragraph 4.5</p> <p>Paragraph 4.5 of the SPG states: “These assessments [LCAs] provide a broad context for considering proposals and therefore due to the wide range in the size, nature and location of sites, it is important that individual sites are considered on a case-by-case basis taking account of</p>	<p>Park Authority and form the basis for policy 1 of the Local Development Plan 2. All development is considered on its individual merits against the policies of the adopted development plan. Paragraph 2.12 of the draft Supplementary Planning Guidance correctly clarifies that there are certain areas where existing developments have already breached the need to protect the National Park landscape which will have to be taken into account when considering further planning applications for extensions or new developments in the area. This does not preclude individual planning applications being considered on their individual merits.</p> <p>No change is necessary.</p>

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		<p>the site's individual circumstances and features."</p> <p>Bluestone endorses the guidance at Paragraph 4.5 which acknowledges the importance of considering development sites on a case by case basis within the broader context of the Landscape Character Assessments. This is especially important owing to the scale and extent of the Character Areas as well as the variations in landscape character and site specific characteristics within individual Landscape Character Areas. Indeed, it is vital that individual sites are considered on a case-by-case basis so that applications are considered on their merits, taking into account site specific considerations, such as mitigation measures proposed and the environmental, visual, economic and social benefits of the development.</p> <p>General Point – Mitigation Measures Throughout the SPG, particularly within the Landscape Character Area-specific guidance, there is mitigation guidance that can be helpful in certain circumstances. The requirements are wide-ranging and not always realistic. Bluestone considers that each suggestion must be considered on a site by site basis as visibility will vary significantly between sites and within Landscape Character Areas.</p>	
43.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>Name of SPG item: Caravan, Camping and Chalet</p> <p>Support: Paragraph 2.10, Paragraph 4.5</p>	Support noted.
44.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>Object: Paragraph 1.5</p> <p>Paragraph 1.5 of the SPG states:</p> <p>"The character and nature of the National Park attracts many visitors. This has led to significant development of caravans, camping and chalet developments in places which in turn have detrimentally affected the qualities of the National Park that visitors seek to enjoy. This development has supported the economy of the area, especially in the summer months. In carrying out the two primary purposes the NPA has a duty to seek to foster the economic</p>	It is agreed that the paragraph requires clarification. A replacement paragraph is proposed. (See extract from the post-consultation Supplementary Planning Guidance document in Appendix C).

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		<p>and social well-being of local communities within the National Park. There is therefore a balance to be struck in conserving and enhancing the National Park as the prime purpose on the one hand whilst supporting the local economy on the other. This guidance seeks to assist the National Park Authority in guiding existing, and possibly new, caravan, camping and chalet development to achieve this balance.” (Lichfields emphasis)</p> <p>Bourne Leisure considers that the statement that caravan, camping and chalet developments have detrimentally affected the qualities of the National Park is an unreasonable statement which unfairly frames the document. Whilst the remainder of Paragraph 1.5 discusses the importance of striking a balance between conserving and enhancing the National Park and supporting the local economy, the statement identified above creates a starting point that all caravan, camping and chalet development results in an adverse impact upon the National Park. Bourne Leisure therefore proposes the following amendment to Paragraph 1.5:</p> <p>“The character and nature of the National Park attracts many visitors. This has led to significant development of caravans, camping and chalet developments in places which in turn have detrimentally affected the qualities of the National Park that visitors seek to enjoy. This has led to an increased demand for caravans, camping and chalets in areas of the National Park. If inappropriately located, the quality of the National Park can be harmed. Nonetheless, this development has supported the economy of the area, especially in the summer months. In carrying out the two primary purposes the NPA has a duty to seek to foster the economic and social well-being of local communities within the National Park. There is therefore a balance to be struck in conserving and enhancing the National Park as the prime purpose on the one hand whilst supporting the local economy on the</p>	

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		other. This guidance seeks to assist the National Park Authority in guiding existing, and possibly new, caravan, camping and chalet development to achieve this balance.” (proposed amendments underlined and with strikethrough)	
45.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>Object: Paragraph 2.7</p> <p>Paragraph 2.7 of the SPG states: “Capacity is taken to mean the amount of change that an LCA can accommodated without adverse changes to the character or key characteristics or undue consequences for the achievement of landscape policies in the area. It takes into account existing development within the area as well as the sensitivity and deals with the issue of potential cumulative effects at a strategic level. Therefore an area which has a substantial amount of existing development may be considered to be at capacity even though its characteristics may be able to accommodate certain types of development. An area which has no existing development with characteristics which are highly sensitive would also have no capacity for development.”</p> <p>The SPG cannot be used as a tool for automatic refusal of planning permission if development is proposed in an area where there the study concludes that there is no capacity for development in that particular Landscape Character Area. The assumptions that “an area which has a substantial amount of existing development may be considered to be at capacity even though its characteristics may be able to accommodate certain types of development” and “an area which has no existing development with characteristics which are highly sensitive would also have no capacity for development” conflict with the purpose of the 2015 Caravan, Camping and Chalet Capacity Assessment which informs the SPG. These are significant, broad assumptions that are being made on a Landscape Character Area basis.</p>	<p>All development is considered on its individual merits against the policies of the adopted development plan. Paragraph 2.12 of the draft Supplementary Planning Guidance correctly clarifies that there are certain areas where existing developments have already breached the need to protect the National Park landscape which will have to be taken into account when considering further planning applications for extensions or new developments in the area. This does not preclude individual planning applications being considered on their individual merits.</p> <p>As acknowledged in this representation, the draft Supplementary Planning Guidance already acknowledges a need for sites to be considered on a case by case basis in paragraph 2.10.</p> <p>No change is required.</p>

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		<p>Whilst the 2015 study was an important tool for informing the policy development of an emerging local development plan, they cannot be used as the starting point for the determination of a planning application. It is important that the SPG is clear that it is not reasonable to use Landscape Character Area scale assessments to be determinative on a development proposal for an individual site. Indeed, this is echoed elsewhere in the SPG.</p> <p>As stated in the supporting text to Policy 41 of the Local Development Plan (Caravan, Camping and Chalet Development): "The Caravan, Camping and Chalet policy below is supported by a Caravan, Camping and Chalet Capacity Assessment (November 2015), which was a systematic assessment of the capacity of existing 28 Landscape Character Areas to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. It also provided advice on a Landscape Character Area basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated." (paragraph 4.208) (our emphasis)</p> <p>On the basis of the above and assuming that the National Park Authority is not going to revisit the methodology of the 2015 Landscape Character Assessment, Bourne Leisure proposes the following amendments to Paragraph 2.7:</p> <p>"Capacity is taken to mean the amount of change that an LCA can accommodated without adverse changes to the character or key characteristics or undue consequences for the achievement of landscape policies in the area. It takes into account existing development within the area as well as the sensitivity and deals with the issue of potential cumulative effects at a strategic level. <u>The Caravan, Camping and Chalet Assessment (2015)</u></p>	

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		<p><u>provides a systematic assessment of the capacity of Landscape Character Areas to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. It also provides advice on a Landscape Character Area basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated. Notwithstanding the conclusion of the assessment that a Landscape Character Area is at development capacity, it is recognised that there may be capacity to accommodate certain types of development on an individual site basis. Therefore an area which has a substantial amount of existing development may be considered to be at capacity even though its characteristics may be able to accommodate certain types of development. An area which has no existing development with characteristics which are highly sensitive would also have no capacity for development.</u>" (proposed amendments underlined and with strikethrough)</p>	
46.	<p>1095/Camping</p> <p>Lichfields on behalf of Bourne Leisure</p>	<p>Object: Paragraph 2.10</p> <p>Paragraph 2.10 of the SPG states: "The sizes of site above act as a broad guide to capacity as there is a spectrum of effects from different types of development on different sites. There may be cases where smaller developments have a greater effect in some locations and slightly larger sites may have less effect in others. Infrastructure associated with different types of development will influence the impact of the development. The effects of individual sites and developments would need to be demonstrated on a case by case basis."</p> <p>Bourne Leisure endorses the guidance at Paragraph 2.10 which states that the effects of individual sites would need to be demonstrated on a case by case basis. Indeed, it is vital that individual sites are considered on a case-by-case basis so that applications are considered on their</p>	<p>Comment noted.</p>

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		merits, taking into account site specific considerations, such as the impact of development on a smaller parcel of land within the character area, mitigation measures proposed and the social, visual, environmental, and economic benefits of the development.	
47.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>Object: Paragraph 2.12 Paragraph 2.12 of the SPG states: "The capacity of an LCA to accommodate further development has to be considered within the parameters of the primary purpose of the National Park. This is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Where there are areas where existing development runs contrary to that purpose it is likely that the capacity for further development is very limited and that the existing development should be improved in order to enhance the area."</p> <p>Bourne Leisure consider that the assumption set out in Paragraph 2.12, that where there are areas where existing development runs contrary to the primary purpose of the National Park, it is likely that the capacity for further development is very limited, does not allow the consideration of the merits of individual sites. Paragraph 2.12 is therefore in direct contrast to other paragraphs within the SPG (namely 2.10 and 4.5) that state that it is important for sites to be considered on a "case-by-case basis".</p> <p>Bourne Leisure therefore proposes the following amendment to Paragraph 2.12: "The capacity of an LCA to accommodate further development has to be considered within the parameters of the primary purpose of the National Park. This is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Where there are areas where existing development runs contrary to that purpose it is likely that the capacity for further development is very limited and that the existing development should be improved in order to enhance the area." (proposed amendment with strikethrough)</p>	<p>The National Park Purposes are set out in the 1995 Environment Act and are fundamental to the management of the National Park. The Purposes and accompanying duty set out the context for the work of the National Park Authority and form the basis for policy 1 (National Park Purposes and Duty) of the Local Development Plan 2. All development is considered on its individual merits against the policies of the adopted development plan. Paragraph 2.12 of the draft Supplementary Planning Guidance correctly clarifies that there are certain areas where existing developments have already breached the need to protect the National Park landscape which will have to be taken into account when considering further planning applications for extensions or new developments in the area. This does not preclude individual planning applications being considered on their individual merits.</p> <p>No change is necessary.</p>

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48.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>Paragraph 4.5</p> <p>Paragraph 4.5 of the SPG states: “These assessments [LCAs] provide a broad context for considering proposals and therefore due to the wide range in the size, nature and location of sites, it is important that individual sites are considered on a case-by-case basis taking account of the site’s individual circumstances and features.”</p> <p>Bourne Leisure endorses the guidance at Paragraph 4.5 which recognises the importance of considering sites on a case-by-case basis within the broader context of the LCAs. This is particularly important owing to the extent and scale of the LCA as well as the variations in landscape character and site specific characters within individual Landscape Character Areas. Indeed, it is vital that individual sites are considered on a case-by-case basis so that applications are considered on their merits, taking into account site specific considerations, such as mitigation measures proposed and the social, visual, environmental, and economic benefits of the development.</p>	Support for paragraph 4.5 is noted.
49.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>Section 4</p> <p>Section 4 of the SPG sets out a summary of recommendations for the Landscape Character Areas. We note that the SPG does not consider the potential benefits of relocating existing caravan, camping and chalet developments which, even with a small increase in unit numbers, can often result in an overall net gain in landscape quality. The SPG should therefore support the principle of relocation on part or all the site where these result in improvements to the National Park.</p>	<p>The Supplementary Planning Guidance supports Policy 41 (Caravan, Camping and Chalet Development) of the Local Development Plan 2. The Policy allows for extensions to sites with no increases in pitches to allow pitches in prominent locations to be transferred to more discreet locations. Proposals to increase pitch numbers within existing sites are also permitted by the policy where the extension is in a well-screened location.</p> <p>The Supplementary Planning Guidance is intended to provide more detailed siting guidance in such instances. Such an amendment would go beyond the adopted Policy of the Local Development Plan.</p> <p>No change is proposed.</p>
50.	1095/Camping	<p>Appendix B</p> <p>Appendix B of the SPG sets out the general mitigation and enhancing guidance. According to Paragraph</p>	<p>It is agreed that there may be occasions when sites are found to be acceptable on their individual merits in discreet locations in Landscape</p>

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	Lichfields on behalf of Bourne Leisure	<p>2.16 of the SPG, this “guidance on mitigation indicates how to enhance existing sites and how to achieve positive designs in new sites or extensions.” Paragraph 4.6 of the SPG also makes it clear that the tailored recommendation and guidance for each Landscape Character Area takes precedence over the generic guidance in Appendix B. Nonetheless, the 23 general mitigation and enhancement measures listed in Appendix B are not unreasonable in the context of Policy 8 (Special Qualities) and Policy 41 (Caravan, Camping and Chalet Development) of the adopted Local Development Plan. However, not all of the 23 mitigation and enhancement measures will be relevant to all sites or development proposals. This should be recognised in Appendix B of the SPG and Bourne Leisure therefore proposes the following amendment to the “Notes” section that introduces Appendix B:</p> <p>“Note: The siting guidance only applies to landscape character areas where potential for sites have been identified and should be read in conjunction with the recommendations and guidance for each area which takes precedence. <u>The mitigation and enhancement guidance should be applied where appropriate to the context of the application site.</u>” (proposed amendment underlined)</p>	<p>Character Areas with no potential for development identified and in such cases this siting guidance would be equally valid. It is suggested that the note at the beginning of Appendix B (relocated to a new Section 6 of the document) is amended as follows:</p> <p>The siting guidance should be read in conjunction with the recommendations and guidance for each individual landscape character area. The latter guidance takes precedence.</p>
51.	1095/Camping Lichfields on behalf of Bourne Leisure	<p>General Point – Restricting caravan, camping and chalet units to the edge of fields</p> <p>Throughout the SPG, particularly within the Landscape Character Area-specific guidance, there is mitigation guidance that states that the location of caravan, camping and chalet units should be restricted to the edge of fields. Bourne Leisure considers that this should not be a consistent requirement and should be considered on a site by site basis as visibility will vary significantly between sites and within Landscape Character Areas. Indeed, some development proposals will result in greater impacts if they are located to the edge of a field.</p>	<p>The use of mature vegetation to mitigate the visual impact of development is an established and effective approach. The lists of siting guidance provides a range of advice that could be followed in any particular circumstance, judging each proposal on its merits. There is no reason for removing this element of siting guidance from the document.</p> <p>No change is necessary.</p>

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	Community Land Trust & Affordable Housing		
52.	4693/CLT Nolton & Roch CLT	<p>Support</p> <p>Our CLT is pleased that PCNPA has been updating their affordable housing policies and planning guidance to recognise the important role Community Land Trusts can play in the realisation of community-led affordable housing. Though we are new to this activity, in this document on how a CLT and Parks Authority will work together to achieve affordable housing, all we read seems fine. We take point 19. very much to heart- the pandemic has delayed us in gaining the degree of genuine community support that we desire for our potential first housing project. We believe that with thorough preparation of a proposal for our local residents, and renewed prospects of meeting face-to-face, we will obtain that support. Certainly there was a high degree of support expressed by the 120 respondents to our 2020 Housing Needs Survey. A question on point 19. (...), particularly if the community itself will take ownership of c legal ownership is meant here- for example, the CLT being the Freeholder of the affordable residential properties. Indeed, we understand from the NCLT Network that such an ownership position is one of the keys to sustaining affordability in perpetuity. Furthermore, to enable a CLT to have an adequate say in a project undertaken with a partner (e.g. an RSL), we believe ownership of the Exception Site plot is also important. As we see it, a major issue in Wales is that sources of capital funding for CLTs are relatively rare, as compared to what has developed in England, where CLTs are more established, and between 50 and 100 have completed their initial housing projects. Therefore, a comment/request is that, with PCNPA already having what appears to be full control of defining and applying the conditions around S106 agreements for developments on Park-managed land, we hope PCNPA can work with the County Council to gain some say in the actual awarding</p>	<p>Support for the guidance is noted.</p> <p>Responsibility regarding the distribution of affordable housing contributions within the framework of the affordable housing supplementary planning guidance and the jointly agreed framework for spend (within the terms of the guidance) is the responsibility of the Housing Authority. The National Park Authority liaises with the Housing Authority on a regular basis and would respond to any specific queries on potential spending opportunities at the time. The work of Community Land Trusts is supported in principle by the Authority.</p>

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		of S106 monies for affordable housing projects within the Park. After the initial meeting with Nicola Gandy last October, and her tour of potential exception Sites, we look forward to further building a fruitful relationship with PCNPA, and achieving together something significant for the well-being of our Community's residents.	
53.	2902/CLT Newport Town Council	<p>I would be pleased if you could register this as our response on the Supplementary Guidance consultation.</p> <p>Place Plans, Placemaking and so on are quite vague in terms of their parameters. I think the best representation of what we are suggesting is on the Brecon National Park Authority website -</p> <p>Place Plans in the National Park A Place Plan is the opportunity for a community to come together and talk about what needs to happen to make a place the best it can possibly be. The purpose of a place plan is to:-</p> <ul style="list-style-type: none"> • Gather evidence about your area to understand what issues the community is facing and what opportunities exist. • Talk to the wider community and stakeholders about how the area will develop, and what needs to be done for the future well-being of the community. • Agree how you want the different aspects of your place to be in the future. • Agree a plan to work towards this future, including, where relevant, policies for making decisions about planning and an action plan to set out how identified issues are going to be tackled. • Have the plan agreed by the community, key stakeholders and adopted by the National Park Authority (NPA), potentially for use as Supplementary Planning Guidance (SPG)(i.e as a means to contribute community views to the making of planning decisions) <p>Newport Town Council will be gathering the evidence with the Housing and Needs survey. We would like this information to be used to</p>	<p>It is agreed that Place Plans can cover a wide range of matters.</p> <p>Brecon Beacons National Park Authority, although it has found the approach listed across as useful for engagement, the outcomes have been of limited use for planning purposes.</p> <p>Place Plans need a 'policy hook' -- it is about elaborating further on the detail contained in the statutory development plan. Local Development Plan Manual (starting para 5.6) refers.</p> <p>To this end the approach of this Authority has been to see what is achievable within the framework of the Local Development Plan.</p> <p>So far the intended focus given current resources in the Authority is on:</p> <ul style="list-style-type: none"> ▪ Community Land Trust opportunities for affordable housing. If a local housing needs survey is undertaken by Newport Town Council would the Council have access to land to help deliver a Community Land Trust opportunity to meet those needs? The appropriateness of a housing needs survey methodology would be guided by the Housing Authority. It might be useful to note another Community Land Trust in the National Park has pursued a housing needs survey and is in the process of seeking funding and trying to secure a site. ▪ Climate Change and Adaptation: Here the

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		address issues affecting Newport, one of the most sensitive being how development can be focussed on the wellbeing and needs of the community. With the support and guidance of Pembrokeshire Coast National Park Authority and PCC, Newport Town Council would consult with the wider community to endeavour to reach a conclusion, which can be used as the basis for further discussion with PCNPA and PCC.	<p>Authority is exploring funding opportunities to carry out pilot schemes to be undertaken as part of its partnership working agenda.</p> <ul style="list-style-type: none"> ▪ Nature Recovery: Here again the Authority is exploring opportunities to seek funding to pilot schemes in local communities. <p>The last two examples may overlap with the Authority's planning function and can be progressed to dovetail with it.</p>
54.	4213/CLT Natural Resources Wales	<ul style="list-style-type: none"> • Place Plan – Community Land Trust and Affordable Housing <p>We welcome the SPG and support the Site Assessment criterion outlined in Appendix 4.</p> <p>Paragraph 11 'Bringing A Site Forward: Tips and Advice' table, the Ecological Sensitivity section should include protected species.</p>	Agree amendment done.
55.	3468/CLT Campaign for the Protection of Rural Wales	<p>We support and welcome affordable housing schemes to provide good homes for those unable to afford to buy. But we remain dismayed at the failure to protect new built homes within the National Park from becoming second homes, holiday homes, buy to let holiday homes, air b and b homes and buy to let homes. We are concerned because the housing numbers allocated to the National Park for new builds, was based on local needs, and the housing register. As a County Council member intimated at a planning meeting about a new housing estate granted consent in Jameston, the consented homes being proposed were too expensive for local people.</p>	<p>The issues raised here are partly addressed in response to the representation submitted by Mr Harrington (4698/Gen).</p> <p>The housing provision figures for the Local Development Plan were debated at Examination and are not open to review through the preparation of Supplementary Planning Guidance.</p>
	Renewable Energy		
56.	4213/Renew Natural Resources Wales	<p>We welcome and support the submitted SPG and offer the following comments.</p> <p>1.15 – <i>'The National Park Authority has also prepared Guidance on the Cumulative Impact of Turbines which will assist...'</i>, we would query whether this evidence is also being updated.</p>	1.15: Yes, a review of the Cumulative Impact Guidance is currently being undertaken and an opportunity to comment on revised guidance will be given.
57.	4213/Renew	1.38 - It is stated that four sizes of field scale solar PV developments have been identified as having the potential to be located within the National Park.	Policy 33 of the Local Development Plan states that large scale renewable energy schemes will be permitted where they would not

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	Natural Resources Wales	These are classified to reflect the landscape sensitivities. The largest of field scales is noted as >5ha. For clarification, is the table suggesting that >5ha would not be permitted or is there an upper limit where they would not be permitted? From Annex 1, it is noted that large scale solar PV (>5ha) is not advisable anywhere.	individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park. It is correct that the four sizes are classified to reflect the landscape sensitivities in each of the Landscape Character Areas and that large scale solar PV (>5ha) is not advisable in any of the LCAs. The onus would therefore be on any applicant to demonstrate that there would be no unacceptable adverse effect on the National Park for any scale of development. All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context.
58.	4213/Renew Natural Resources Wales	1.39 – It is stated that ‘panels are dark in colour as a result of their non-reflective coating.’ Please note, panels can appear pale grey (as in photo Page 17) or blue in colour, depending on the light conditions and type of panel. They are not completely non-reflective, hence the requirement for glint and glare assessments in some cases. The aluminium surrounds and electric cable coverings are also pale/white, and the surrounds can reflect light. Reflectivity is referred to in Paragraph 1.45 of the document.	It is agreed that panels can appear different colours depending on light conditions and type of panel. An amendment to paragraph 1.39 will address this concern.
59.	4213/Renew Natural Resources Wales	1.41 – It is stated that new access tracks are not a requirement. However, new access tracks are frequently included to allow for regular maintenance and access to the panels and transformers for example. Is the SPG suggesting that new access tracks will not be permitted?	If access tracks are required as part of solar PV development they will form part of the full application and will be considered within the context of the application and against the policies of the Adopted Local Development Plan. It is therefore considered that paragraph 1.41 is superfluous. Propose deletion of paragraph 1.41.
60.	4213/Renew Natural Resources Wales	1.45 – Reference is made to reflectivity. We would advise that this does not only apply to railways but is also relevant to roads, residential amenity and recreational users of public rights of way and is an issue of visual amenity as well as safety.	It is agreed that roads, residential areas and public highways may also be affected. An amendment to para 1.45 is proposed to address these issues.

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61.	4213/Renew Natural Resources Wales	1.49 – The list should include reference to glint and glare.	It is agreed that the list should include reference to glint and glare. It is proposed to include an additional bullet point.
62.	4213/Renew Natural Resources Wales	4.6 – It is stated that four sizes of wind turbines have been identified, up to 125m. These are classified to reflect the landscape sensitivities. To confirm, turbines greater than 125m to blade tip would not be permitted?	Policy 33 of the Local Development Plan states that large scale renewable energy schemes will be permitted where they would not individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park. It is correct that the four sizes are classified to reflect the landscape sensitivities in each of the Landscape Character Areas and that large turbines (65 -125m) are not advisable in the majority of the Landscape Character Areas. The onus would therefore be on any applicant to demonstrate that there would be no unacceptable adverse effect on the National Park for any scale of development. All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context.
63.	4213/Renew Natural Resources Wales	4.10 – It is stated the 'The National Park Authority has also prepared detailed supplementary guidance on the cumulative impacts of wind turbines'; we would query whether this is being updated. We also suggest that a paragraph should be included regarding wind energy developments within the setting of the National Park, including both on-shore and off-shore developments, where the National Park is a consultee. Where visible, these developments outside the park should be considered in cumulative assessments of proposals within the Park.	4.10: Guidance on Cumulative Impacts of Wind Turbines is being updated. The impact of wind energy developments within the setting of the National Park but outside the National Park are considered using the guidance the Cumulative Impact of Wind Turbines Supplementary Planning Guidance in support of the policies of the Local Development Plan, in particular Policy 14 Conservation of the Pembrokeshire Coast National Park.
64.	4213/Renew Natural Resources Wales	4.11 - On-shore grid connections for off-shore wind installations (and tidal installations) can also be laid on the ground for example, over a cliff face, as well as underground or overhead. New substations can also be required, as well as cable routes. Within this paragraph reference should also be made to tidal energy schemes.	It is agreed that amendments should be made to paragraph 4.11 to address these concerns. Amendments to para 4.12 and the section title are also proposed as a result of the changes to para 4.11.

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65.	4213/Renew Natural Resources Wales	Annex 1 and Annex 2 General Comments – Within the Caravan Camping and Chalet Development Draft SPG reference is made to the National Park's Seascape Character Assessment (Box 1: Summary of study process). We note that this is not referenced within this SPG (Annexes 1 and 2). We advise that the Draft Renewable Energy SPG would benefit from reference to the Seascape Character Assessment, in particular, as wind turbines can be very visible from coast and sea.	<p>The interaction between on-shore and off-shore wind turbines would be addressed through the Cumulative Impact of Wind Turbines Supplementary Planning Guidance. A review of this guidance is underway which will address this point in more detail. Below provides an outline of how this issue would be considered.</p> <p>Off-shore windfarms tend to be very large and some distance off-shore. A national seascape assessment has been undertaken which identifies and describes the character of different areas of seascape. For each seascape area, land that is intervisible with the sea is mapped, with different levels of intensity. This should be used initially to establish the relationship between the proposed development (on land) and the sea. The sensitivity of seascape to off-shore wind farm development is considered in a linked series of reports, also available from the Natural Resources Wales' website. These set out the sensitivities which are related in particular to designated areas such as the Pembrokeshire Coast National Park and Gower Area of Outstanding Natural Beauty. This has relevance in terms of the level of sensitivity and the distance over which that sensitivity applies.</p> <p>The local seascape character assessments for the Pembrokeshire Coast National Park (adopted as Supplementary Planning Guidance) and Carmarthen Bay/Gower set out the character and sensitivities of local seascape character areas. If the proposal is intervisible with an area of sea or coast along with another terrestrial wind energy development and/or off-shore renewable energy development, the cumulative effects on regional or local seascape character area(s) should be identified depending on the scale of development, taking into account the Natural Resources Wales contextual studies.</p> <p>Viewpoints should be selected in representative, sensitive and/or worse case locations taking account</p>

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			<p>of the particular sensitivity of the coastline, seascape and various receptors. These should be located in all the relevant local seascape character areas in the defined study area. Wirelines and /or photomontages should illustrate the wind turbines along with off-shore wind turbines. An assessment of the effects should be made from each of these and then used to inform judgements on landscape, seascape and visual cumulative effects.</p> <p>It is proposed that a cross reference to each guidance document referred to above be inserted in the Renewable Energy Supplementary Planning Guidance at paragraph 4.11.</p>
66.	4213/Renew Natural Resources Wales	Some of the Landscape Character Areas (LCAs) note in bold the level of sensitivity but this is not consistent throughout all LCAs. In addition, a number of LCAs use the wording 'would be sensitive', it is unclear what this means. Consistency and further explanation within LCA tables is recommended within both Annexes.	<p>This comment refers to Annex 2 of the Supplementary Planning Guidance.</p> <p>It is agreed that the use of the bold type is inconsistent. As all Landscape Character Areas indicate the sensitivity through the means of colour coding, it is proposed to remove the bold type relating to wind turbine sensitivity from Landscape Character Areas:</p> <p>3: (Caldey Island), 4: (Manorbier/ Freshwater East), 5: (Stackpole), 8: (Freshwater West / Brownslade Burrows), 10: (Skomer and Skokholm), 22: (Mynydd Carningli).</p> <p>The wording 'would be sensitive' is used in Landscape Character Area 1: Saundersfoot and Landscape Character Area 9: Marloes. In order to ensure consistency throughout Annex 2 amendments are proposed for Landscape Character Area 1 and Landscape Character Area 9 to reflect the wording in the rest of the Landscape Character Areas.</p>
67.	4213/Renew Natural Resources Wales	Annex 2 LCA 7 – The Guidance section identifies a location close to Valero Oil Refinery as suitable for a single or small cluster of medium or large turbines. Given that a wind turbine application was recently refused and dismissed at appeal outside the park but adjacent to Valero, we query the soundness of this	The guidance for each Landscape Character Area has been updated following desk based studies and field verification in 2020. The study informing the basis of the Supplementary Planning Guidance took into account the number and size of existing operational turbines and the key landscape features and

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		<p>guidance and question whether cumulative effects with other tall structures such as chimneys, as well as turbines is being considered. We also question whether guidance on cumulative impacts should apply in all LCAs, except where no turbines are advised. There would appear to be potential for cumulative impacts in LCAs 6, 9 and 21 for example. Consistency of approach is needed.</p>	<p>designations of each Landscape Character Area as a result of LANDMAP updates.</p> <p>The application and appeal stated refers to planning application 13/0876/PA and subsequent appeal APP/N6845/A/15/3025045 for 5 wind turbines of 100m to blade tip. Landscape Character Area 7 has a high sensitivity to large turbines and states that the majority of this Landscape Character Area is unsuitable for large or medium scale turbines. The guidance states that there may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) on land close to existing oil refinery chimneys (on the eastern edge of the Landscape Character Area). The guidance also states that where assessments have made reference to 'small clusters' of wind turbines, these comprise groups of 2-3 turbines rather than the 5 that were proposed in the above application.</p> <p>All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context. The purpose of the Supplementary Planning Guidance is to provide more detailed guidance on the way in which the policies of the Plan will be applied, in this case, primarily Policy 33. Policy 33 states that proposals for small and medium scale renewable energy schemes will not be permitted where they individually or cumulatively have an adverse effect on the visual amenities, landscape character and/or nature conservation value of the local area. Large scale schemes will not be permitted where they individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park.</p> <p>The impact of wind energy developments within the setting of the National Park but outside the National Park as well as within the</p>

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			National Park are considered in the Cumulative Impacts of Wind Turbines Supplementary Planning Guidance.
68.	4213/Renew Natural Resources Wales	Annex 2 LCA 11 – The potential for medium-large scale turbines has been identified close to the oil refineries and other industry. Again, we query whether the cumulative impacts with other tall structures such as chimneys, as well as turbines is being considered. We have concerns regarding the acceptance of large-scale turbines (in LCA 7 and 11) within the National Park, with regard to the likely increase in adverse cumulative effects. Such large scale developments, in combination with existing, are likely to erode the natural beauty of the National Park in our view, rather than help to conserve and enhance it. Once a location is considered acceptable for wind turbines, it should be noted that turbines are frequently re-powered to larger structures as the industry standards continue to increase in scale. Such repowering can lead to small, but incremental adverse cumulative effects.	<p>The guidance for each Landscape Character Area has been updated following desk based studies and field verification in 2020. The study informing the basis of the SPG took into account the number and size of existing operational turbines and the key landscape features and designations of each Landscape Character Area as a result of LANDMAP updates.</p> <p>All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context. The purpose of the Supplementary Planning Guidance is to provide more detailed guidance on the way in which the policies of the Plan will be applied, in this case, primarily Policy 33. Policy 33 states that proposals for small and medium scale renewable energy schemes will not be permitted where they individually or cumulatively have an adverse effect on the visual amenities, landscape character and/or nature conservation value of the local area. Large scale schemes will not be permitted where they individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park.</p> <p>The impact of wind energy developments within the setting of the National Park but outside the National Park as well as within the National Park are considered in the Cumulative Impacts of Wind Turbines Supplementary Planning Guidance.</p>
69.	2897/Renew Marloes & St. Brides Community Council	Our Community Council objects to the Renewable Energy section of the Draft Supplementary Planning Guidance to the PCNPA LDP2, on the basis that as currently drafted it is not fit for purpose. The document makes no reference to the Climate Emergency, nor to the consequences of COVID 19 or of Britain leaving the European Union.	See Officer response to detailed comments below.

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		Our detailed comments are listed below, following the document's ordering.	
70.	2897/Renew Marloes & St. Brides Community Council	<p>Page 7 1.1 Introduction The very first statements in this document should bluntly set out the situation we are facing, as follows –</p> <ol style="list-style-type: none"> 1. Climate Emergency declarations by HMG, the Welsh Government, Pembrokeshire County Council, and the PCNPA. 2. The UK legal commitment to net zero carbon emissions by 2050. 3. The vulnerability to climate change of Pembrokeshire's natural environment including its special habitats, its internationally important seabird colonies, and the delicate ecological balance underlying its special landscape properties. 4. The likely impact on Pembrokeshire farming, forestry, fishing, manufacturing, and tourism of wetter winters and drier summers with much higher peak temperatures. 5. The projected impact on Pembrokeshire's marine flora and fauna of sea temperature rise coupled with ocean acidification caused by increased atmospheric carbon dioxide concentration. 6. Recent peer-reviewed projections of sea level rise, giving a strong likelihood of 1.2 metres by the end of the century unless all mitigating measures are taken to reduce carbon dioxide emissions resulting from human activity. 7. The experience of the COVID 19 pandemic, which has flagged up the economic vulnerability of the National Park because of an overdependence on tourism and visitors and a long-term discouragement in planning policy of alternative commercial activity such as light industry. 8. The combined COVID/Brexit transport and logistics experience, highlighting West Wales' often unnecessary dependence on long and complicated supply chains for food and drink, many other goods, and essential services. 9. Further to all the above, the need for farmers and other landowners (including local authorities), communities, and individuals to be 	<p>The purpose of the Supplementary Planning Guidance is to provide detailed and updated guidance for renewable energy in each of the Landscape Character Areas to support Policy 33 of the Local Development Plan.</p> <p>The policy framework for renewable energy provides support for renewable energy proposals which take account of the Special Qualities of the National Park.</p> <p>The implications of the climate emergency, Covid-19 pandemic and Brexit are highlighted in the national planning policy documents - Planning Policy Wales 11 and Future Wales – The National Plan 2040. All planning applications for renewable energy will be considered against the policies of the Adopted Local Development Plan which has been prepared in accordance with national planning policy documents.</p> <p>Paragraphs 1.22-1.24 have been updated to reflect the publication of Planning Policy Wales Edition 11 and Future Wales – 2040.</p>

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		able to diversify with the minimum possible impediment to alternative means of generating income, with renewable energy given an obvious and inevitable priority.	
71.	2897/Renew Marloes & St. Brides Community Council	Page 7 1.6 The statement classifying heat pumps as “low carbon” is inaccurate, because a heat pump operator signed to a green electricity tariff or reliant on home-generated renewable electricity plus battery storage will achieve zero carbon heating. Far better to point that out, and thus encourage a joined-up approach to developments with heat pumps plus PV and/or micro wind strongly encouraged.	It is recognised that in certain circumstances, for example, where electricity is supplied by a green energy supplier, it is possible to generate zero carbon energy. An addition to Paragraph 1.6 is proposed to address this.
72.	2897/Renew Marloes & St. Brides Community Council	Page 7 1.8 The full wording of this section is, “Renewable energy offers an alternative to energy generation using fossil fuels. The environmental benefits of renewable energy primarily link to reducing carbon dioxide (CO2) emissions.” In the light of the Climate Emergency, this is unbelievably outdated and wholly insufficient. We propose a re-write, as follows: 1.8a The use of fossil fuels for electricity generation, transport, heating buildings, and powering industrial processes has to be completely phased out worldwide by the year 2050 for humanity to stand any chance of avoiding runaway global temperature rise. Renewable technologies already offer the lowest price electricity; human society must massively increase the production of carbon-free fuels – especially Green Hydrogen, which can be produced using zero carbon electricity. Compared with other parts of Britain, all of Pembrokeshire is favoured with very good onshore renewable energy resources, in particular wind and solar; there is therefore a moral obligation to exploit these resources, including within the National Park boundaries.	It is agreed that paragraph 1.8 does not properly reflect the Welsh Government’s priorities regarding renewable and low carbon energy. An amendment to para 1.8 is proposed to address this concern. It is considered that the points raised in 1.8c and 1.8d are covered in the existing paragraph 1.9.

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		<p>1.8b Furthermore, it is very much in the vested interests of the whole county to make a maximum effort on increasing onshore renewable energy production and thereby permanently bring down Welsh carbon dioxide emissions:</p> <p>* The Pembrokeshire environment's vulnerability to extreme weather events threatens to massively disrupt farming; and it is of course this highly valued environment which underlies the National Park's "special landscape values.</p> <p>* There are so many coastal communities threatened by sea level rise because they cannot beyond the short term be protected against it; these include numerous population clusters from Saundersfoot to lower St Dogmaels – not forgetting lower Pembroke Dock, lower Milford Haven, and central Haverfordwest.</p> <p>* It is not just housing and business properties but crucial infrastructure which is under threat. For example roads, railways, port facilities, sewage treatment plants, electrical substations – and, of course, sea defences generally.</p> <p>1.8c It must be understood that climate mitigation is not the only driver for renewable energy expansion. Revenue from selling renewable energy could make a significant if not crucial difference to the viability of farms, businesses local authority buildings and land, communities and community groups, and the incomes of many families and individuals.</p> <p>1.8d Furthermore, the resulting flow of money into Pembrokeshire as renewable energy was exported would greatly benefit and strengthen its economy which is currently being severely weakened through its buying so much fossil fuel and fossil-fuel-generated electricity from suppliers who are not only outside the county, but most likely headquartered outside the United Kingdom.</p>	
73.	2897/Renew Marloes & St. Brides	General observation about landscape sensitivity	National planning policy in Planning Policy Wales 11 states at paragraph 6.3.5 that planning authorities have a statutory duty to have regard to

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	Community Council	<p>As regards landscape sensitivity, we understand and appreciate the motivation behind the preparation of these maps. However, as we have already pointed out, the special qualities of the National Park landscape are under real threat of being wiped out as a result of runaway climate change. Many respected commentators, including Sir David Attenborough, make it quite plain that only with a “War Footing” attitude being taken by Britain and all other developed world countries, can we avoid ecological catastrophe.</p> <p>In the Second World War, many airfields and other sorts of defence infrastructure were constructed in highly sensitive Pembrokeshire locations because they were recognised as being essential to the War Effort. The National Park must accept that, in the face of all of the Climate Emergency projections threatening mankind, it would render itself liable to challenge on numerous grounds, including the interests of future generations, should it insist on rigid adherence to its landscape sensitivity maps when evaluating planning applications for onshore solar and wind power installations.</p>	<p>National Parks’ and Areas of Outstanding Natural Beauty’s purposes and these areas must be afforded the highest status of protection from inappropriate developments. The special qualities should be given great weight in the development planning and development management processes and proposals must be carefully assessed to ensure that their effects on features which the designation is intended to protect are acceptable (6.3.9).</p> <p>All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context, including the impact on the landscape and the Special Qualities of the National Park. It would be inappropriate for the Authority not to consider impacts on the National Park given its legal status.</p>
74.	3468/Renew Campaign for the Protection of Rural Wales	<p>liiINTRODUCTION TO THE SPG RENEWABLE ENERGY Paragraphs 1.22 to 1.24 (PPW 10 and TAN 8) This is now out of date as Future Wales and PPW11 are due to be published shortly’ Paragraph 1.18 it would be helpful if the thresholds were included for Renewable Energy Developments of National Significance.</p>	<p>Paragraphs 1.22-1.24 have been updated to reflect the publication of Planning Policy Wales Edition 11 and Future Wales – 2040.</p> <p>Paragraph 1.24 has been updated to provide reference to Future Wales 2040 as Technical Advice Note 8 has been revoked by Welsh Government.</p> <p>With regard to paragraph 1.18 additional text is proposed to reflect the updates on Developments of National Significance as a result of the publication of Future Wales.</p>
75.	3468/Renew Campaign for the Protection of Rural Wales	<p>SOLAR INSTALLATIONS ... FIELD SCALE SOLAR PHOTOVOLTAICS Para. 1.39 Not all panels are dark in colour and those that are not always perceived as dark.</p>	<p>It is agreed that panels can appear different colours depending on light conditions and type of panel. An amendment to paragraph 1.39 will address this concern.</p>
76.	3468/Renew Campaign for the Protection of Rural Wales	<p>para 1.43 We support. In the past there was a feeling that a slope was needed to house them but this meant they were more obvious in the</p>	<p>Support noted.</p>

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		landscape which produced greater adverse impacts.	
77.	3468/Renew Campaign for the Protection of Rural Wales	Para 1.46 We agree that cumulative effects should be a major consideration as this has the propensity to change landscapes. ...	Support noted.
78.	3468/Renew Campaign for the Protection of Rural Wales	Para 1.49 spacing of solar panels can reduce impacts, such as leaving panel free sections around the edges of arrays or gaps in fields of panels where very visible.	Paragraph 1.49 states the key landscape effects that may result from solar PV developments. Annex 1 gives detailed guidance for each of the Landscape Character Areas and includes guidance on minimising the landscape effects.
79.	3468/Renew Campaign for the Protection of Rural Wales	ANNEXE 1 LCA 7 Angle Peninsula Because of its open views we believe that the Small scale solar PV should be taken out of Moderate-High placed in High Sensitivity. The Very small scale solar PV should be moved from Moderate to Moderate High. The key sensitivities described should preclude all but very small developments. We note you have accorded a high sensitivity to Very Small solar PV in Stackpole and a Moderate-High in Manorbier. The Angle peninsula is even more open and therefore solar installations here would be very prominent in the landscape. Angle should be rated as Sensitive as Manorbier. Wind turbine comments follow on a separate sheet	After reviewing the key sensitivities in both Landscape Character Area 4 and Landscape Character Area 7 it is considered that there are no material differences between the landscape sensitivities in the two Landscape Character Areas. It is therefore agreed that Landscape Character Area 7: Angle should be classified in the same manner as Landscape Character Area 4: Manorbier / Freshwater East for small scale and very small scale solar PV development. Landscape Character Area 7 small scale solar PV will change from moderate-high to high sensitivity and very small scale solar PV development will change from moderate to moderate-high sensitivity. There will be consequential amendments to Figure 3.3. Landscape Sensitivity to Field-scale Photovoltaics – Small scale and to Figure 3.4 Landscape Sensitivity to Field-scale Photovoltaics – Very small scale.
80.	3468/Renew Campaign for the Protection of Rural Wales	WIND ENERGY Paragraph 4.10 We support the main siting factors outlined in this paragraph with the reservations stated below.	Noted. See Officer response below for comments on Annex 2.
81.	3468/Renew Campaign for the Protection of Rural Wales	Annexe 2 We take issue with the following: This Special Guidance promotes wind energy in the narrow coastal National Park while expressing the view turbines should be kept from the coast itself. The only areas excluded from potential wind turbine development are:	The guidance for each Landscape Character Area has been updated following desk based studies and field verification in 2020. The study forming the basis of the SPG took into account existing turbines and the key landscape features of each Landscape Character Area as a result of LANDMAP updates. The key sensitivities in combination give each

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		<p>The four islands: Caldey LCA 3: Skomer and Skokholm LCA 10: Ramsey Island LCA 19: plus Freshwater West LCA 8: Carn Llidi LCA16: and Mynydd Carningli LCA22. There is a distinctive north -south divide in that with the exception of Herbrandston LCA11 and Stackpole LCA5, the northern LCAs are protected from large and medium sized wind turbines including LCAs 12,13,14,15,18,20,21,24,25,26,27,and 28. In addition Herbrandston is protected from large turbines but not medium, sized. The only LCA south of the Haven waterway protected from both large and medium wind turbines is Stackpole.</p> <p>In Angle LCA 7 and Castlemartin / Merrion Ranges LCA 6 the NP actually promotes large turbines - contrary to the Guidance in the LCAs alongside or close to the coast consisting of the tidal waterway and the tidal East Angle Bay.</p> <p>Unlike the northern LCAs, the southern LCAs are not distinguished by the statement that large and medium scale turbines would not be appropriate in this open landscape This fails to reflect the fact the character of the Castlemartin Ranges; the Angle Peninsula and its approaches; together with the coastal zone around Manorbier with its long views from and to the ridgeway over its hinterland and the both the coastal zones and inland Freshwater East are largely also open views.</p> <p>The Southern LCAs are also close to settled communities where the facilities of the National Parks, the beaches, and the footpaths are extensively used. These are the playgrounds of the people of Tenby, Saundersfoot, Manorbier, Lamphey, Pembroke and Pembroke Dock as well as for visitors from further afield. These areas deserve to be equally protected from large and medium turbines, especially when so much energy will be produced by Pembrokeshire off-shore, taking the strain off our protected areas.</p> <p>As a result, we conclude that the Authority is discriminating against the more settled south of the National Park</p>	<p>Landscape Character Area an overall sensitivity to wind turbine development. The sensitivity level is taken to mean the extent to which a Landscape Character Area can accommodate different scales of wind turbine development without adverse effects on the landscape character. Most of the Landscape Character Areas (with the exception of those noted Landscape Character Areas 3, 10, 19, 8, 16 and 22) have areas of developed and undeveloped land to varying degrees. The siting guidance provides detailed advice which seek to protect those areas sensitive to wind turbine development.</p> <p>The Supplementary Planning Guidance relates to sensitivity to wind turbine development and not protection as stated in the comments. As such, the comment relating to the only Landscape Character Area south of the Haven waterway 'protected' from both large and medium turbines being Stackpole is incorrect. Landscape Character Area 5: Stackpole has a landscape sensitivity of High / High / Moderate-high to Large / Medium / Small wind turbines respectively. Landscape Character Area 6: Castlemartin / Merrion Ranges and Landscape Character Area 7: Angle Peninsula are classified with the same sensitivities.</p> <p>With regard to the comment that the National Park promotes large turbines alongside or close to the coast in Landscape Character Area 6 and Landscape Character Area 7, the guidance states that the majority of the Landscape Character Area is unsuitable for large or medium scale turbines. The guidance also states that single (or small clusters of small scale turbines in Landscape Character Area 6) should be sited well away from the coastal edge to conserve the views along the coast and the naturalistic character of the coastal edge (Landscape Character Area 6) and away from the undeveloped coastal edge to protect coastal views, including to St. Ann's Head (Landscape Character Area 7).</p>

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		<p>to the detriment of its protected and cherished areas.</p> <p>I quote the following examples:</p> <p>LCA4 Manorbier/Freshwater East The Guidance attached to this LCA gives only a Moderate-High sensitivity to medium scale turbines 25-65m. The Guidance suggests they might be located on the edge of existing urban development. This is an open invitation for developers to attempt to bring turbines as close to the coast as possible with the settlements of Freshwater East and Manorbier practically hugging the coast. Any moving blades visible from these settlements would detract from the special ambience of these coastal settled areas. This is the essence of the south coast of the National Park and should not be diluted when Pembrokeshire through off-shore wind is contributing so much to Wales provision. The Guidance adds that such development should not sacrifice the integrity of the landscape here but that is what promoting turbines up to 65m to tip is doing.</p> <p>LCA6 Castlemartin/Merrion Ranges The relevant Guidance states that ...The majority of this LCA is unsuitable for large or medium scale turbines. But then it adds that There may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m blade tip) scale turbines on land close to existing oil refinery chimneys (on the north-western edge of the LCA) to provide a new point of focus...</p> <p>The guidance further addsElsewhere, this landscape is most suitable for single or small clusters of small scale turbines.</p> <p>This is unacceptable. Wind turbines of various sizes have already been refused consent close to the boundary with this LCA by the County Council. We cannot understand why the National Park should therefore promote them here to the detriment of the protected landscape and contrary to general guidance. This is siting them along the boundary of the National Park which should be avoided. Cherished and protected landscapes</p>	<p>The southern Landscape Character Areas proximity to the named settlements in the comments all have high / moderate-high sensitivities to large and medium sized turbines respectively. The key landscape sensitivities in each of these Landscape Character Areas has been taken into account and the siting guidance seeks to protect the parts of the Landscape Character Area most sensitive to wind turbine development.</p> <p>With regard to the comments made relating to Landscape Character Area 4 Manorbier/Freshwater East the guidance states that there may be opportunity for a single or small cluster of medium sized turbines where sensitively sited, particularly inland and linking development to existing building clusters. In addition, the guidance states that turbines should be sited away from the coastal edge so that they do not intrude into coastal views, protect the character and setting of the Conservation Areas at Manorbier and Portclew, protect the historic and archaeological sites and to ensure that any turbine developments do not detract from the prominent landmarks at Manorbier. As such, no part of the Landscape Character Area is promoted for wind turbine development. There may be sites within this Landscape Character Area that comply with the policies of the adopted Local Development Plan and are supported by the siting guidance in the Supplementary Planning Guidance. The intention is to assess the impact on the Special Qualities of the National Park rather than use a blanket geographical approach to controlling wind turbine development. A sensitivity level of Moderate-high recognises that many of the key landscape features would be adversely affected by renewable energy development and great care would be needed in locating infrastructure. The onus would therefore be on the applicant to demonstrate that there is no unacceptable adverse impact on the special qualities of the National Park,</p>

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		<p>may have abrupt edges but it is understood that development should not mass along their boundaries, but they should have a buffer zone leading into them where large intrusive developments do not take place. LCA 7 Angle Peninsula.</p> <p>This LCA is highly sensitive to any moving blades given its openness, and its settlement and its use by residents of Angle and the local towns of Pembroke and Pembroke Dock. This area does not have a Moderate-High sensitivity to small turbines but a High sensitivity</p> <p>The Guidance states as it does in the adjoining LCA 6 ... The majority of this LCA is unsuitable for large or medium scale turbines . But then it adds that There may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m blade tip) scale turbines on land close to existing oil refinery chimneys (on the eastern edge of the LCA). The sensitivity of this area to medium or large wind turbines is accepted as High. Therefore, any intrusive wind turbines should be avoided here .</p> <p>During the last Inquiry into then Rhoscrowther Wind Farm application for 100m turbines it was agreed that there was probably insufficient room to site what you describe within the National Park. The area in which you appear to promote 100m turbines in is a buffer zone creating clean break between the industrial oil refinery and the coast represented by East Angle Tidal Bay, preventing development extending further into the National Park and onto more of the coast and waterway. This is unacceptable in view of the National Parks s recognition that this is a highly sensitive area for such development. It is also alongside the coast in the coastal waterway where the policy states turbines should be avoided. We are amazed that the PCNPA continues to invite such damaging development which will produce large moving blades within the views of the waterway from the Angle ridge road and from Angle peninsula. The National Park idea that wind turbines here could be a point of focus is difficult to understand. The existing</p>	<p>including the impacts of moving blades.</p> <p>Landscape Character Areas 6 and 7: The siting guidance for each of these Landscape Character Areas states that the majority of the Landscape Character Area is unsuitable for large or medium scale turbines. However, there may be limited opportunity for a single or small cluster of medium or large (under 100m to blade tip) on land close to existing oil refinery chimneys (on the north-western edge of Landscape Character Area 6 and on the eastern edge of Landscape Character Area 7). The guidance seeks to protect the areas that are sensitive to wind turbine development and includes siting turbines away from the undeveloped coastal edge and protecting the historical landscapes and the important coastal habitats and species. As stated for Landscape Character Area 4, any application for wind turbine development, of any scale, would be considered on its own merits and there may be sites within this Landscape Character Area that comply with the policies of the adopted Local Development Plan and supported by the siting guidance in the Supplementary Planning Guidance. The intention is to assess the impact on the Special Qualities of the National Park rather than use a blanket geographical approach to controlling wind turbine development. As stated, the siting guidance states that there may be limited opportunity for wind turbine development in both Landscape Character Area 6 and Landscape Character Area 7 within the context of existing industrial infrastructure of the oil refineries. The onus would therefore be on the applicant to demonstrate that there is no unacceptable adverse impact on the special qualities of the National Park. Guidance on the cumulative impact of wind turbines against other types of development are considered in the Authority's Supplementary Planning Guidance on Cumulative Impacts of Wind Turbines and would be an important material planning consideration.</p>

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		<p>focus is the massive refinery. It is essential that it is not used as an 'excuse' to promote wind turbines around its edges, whether within or outside the National Park. The Regent Refinery was created by special Act of parliament (partly within the boundary of the National Park) for reasons of national need with over-ride normal planning considerations. Because of this exceptional history and status both relevant planning authorities must not fall into the trap of failing to conserve the landscape within its shadow, and in areas which still relate to the glorious views of the Haven waterway, and east Angle Bay. Unfortunately, wind turbines draw the eye from the landscape which is why they are so detrimental to protected ones. The Guidance states that the NP will site turbines away from the undeveloped coastal edge and from Angle Bay to protect the overwintering bird species. And yet you are promoting them here at the entrance to Angle Bay. This is contrary to your policy. Please remove the statement that medium and larger turbines can be sited here as this is inviting developers in. Do not forget that the Oil refinery was partially built on National Park which extended into its grounds. Far from establishing a point of focus, this would extend the area of built mechanical structures which would then extend the refinery features into the National Park.</p>	<p>All planning applications are considered against the policies of the Adopted Local Development Plan and each application is considered fully on a case by case basis within this context. The purpose of the Supplementary Planning Guidance is to provide more detailed guidance on the way in which the policies of the Plan will be applied, in this case, primarily Policy 33. Policy 33 states that proposals for small and medium scale renewable energy schemes will not be permitted where they individually or cumulatively have an adverse effect on the visual amenities, landscape character and/or nature conservation value of the local area. Large scale schemes will not be permitted where they individually or cumulatively have an unacceptable adverse effect on the special qualities of the National Park.</p> <p>In addition, Policy 33 states that all renewable and low carbon energy development proposals will be required to demonstrate that measures have been taken to minimise impacts on the landscape and natural environment of the National Park and there will be no unacceptable impacts on residential amenity.</p> <p>Relating to the Inquiry into the Rhoscrowther Wind Farm application (13/0876/PA and subsequent appeal APP/N6845/A/15/3025045) this was for 5 wind turbines of 100m to blade tip. The guidance for Landscape Character Area 7 states that there may be limited opportunity for a small cluster of medium to large turbines. The guidance states that in this location large turbines would be classified as those under 100m to blade tip and a 'cluster' would comprise of 2-3 turbines rather than the 5 that were proposed in the above application.</p> <p>The Authority's Supplementary Planning Guidance on Cumulative Impacts of Wind Turbines considers the cumulative impacts of turbines with other types of development.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
			No changes are proposed to the sensitivity levels.
82.	1095/Renew Lichfields on behalf of Bourne Leisure	<p>Name of SPG item: Renewable Energy Object: Paragraph 1.50, Paragraph 2.9, Paragraph 3.8 and Paragraph 4.10; Paragraph 1.60 and Paragraph 1.69</p> <p>Paragraph 1.50, Paragraph 2.9, Paragraph 3.8 and Paragraph 4.10</p> <p>Paragraph 1.50 of the SPG provides a checklist of main factors to take into account in the siting of field photovoltaics. Paragraph 2.9 of the SPG provides a checklist of main factors to take into account when siting micro hydro schemes. Paragraph 3.8 of the SPG provides a checklist of main factors to be considered when siting ground or air heat source pumps. Paragraph 4.10 of the SPG provides a checklist of the main factors to consider in the siting of wind energy developments.</p> <p>Within these checklists, there is no reference to ensure that the above types of renewable energy proposals do not have adverse impacts on the amenity of neighbouring land uses, uses such as tourism and/or tourism accommodation sites. Given the value of tourism to the National Park economy, such a reference needs to be included in these checklists. This would also be consistent with Policy 30 (Amenity) of the adopted Local Development Plan which states that "Development will not be permitted where it has an unacceptable adverse effect on amenity..."</p> <p>Adverse impacts on the amenity of tourism and tourism accommodation sites could result in a decline in their success as visitors are deterred and decide to travel/stay elsewhere. This would have consequences for jobs, supplier expenditure and visitor spending.</p> <p>On this basis, Bourne Leisure proposes that the checklists for the siting of the various types renewable energy development detailed in Paragraphs 1.50, 2.9, 3.8 and 4.10</p>	<p>Policy 33 of the Adopted Local Development Plan criterion d) ii) states that renewable and low carbon energy development proposals will be required to demonstrate that there will be no unacceptable impacts on residential amenity.</p> <p>It is agreed that a reference to the need for measures to minimise the impacts on the amenity of neighbouring land uses in paragraphs 1.50, 2.9, 3.8 and 4.10 would strengthen the guidance. An additional bullet point addressing noise and visual impact is proposed for the above paragraphs</p> <p>It is not considered necessary to include reference to odour with reference to PV, micro hydro, ground or heat source pumps and wind energy developments.</p> <p>It is agreed that the checklist for anaerobic digestion and biomass plants only refer to local residents. An amendment to paragraphs 1.60 and 1.69 are proposed to include reference to neighbouring land uses.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>should include the following additional item:</p> <p><u>“Measures should be taken to minimise any visual, odour or noise impacts on the amenity of sensitive neighbouring land users.”</u> (proposed amendment underlined)</p> <p>Paragraph 1.60 and Paragraph 1.69 Paragraph 1.60 of the SPG states: “A checklist of the main factors to take into account in the siting of a small or medium-scale anaerobic digestion plants is provided below: ... • Measures should be taken to minimise any visual, odour and noise impacts on local residents associated with the operation of the plant and delivery of feedstocks.” Paragraph 1.69 of the SPG states: “A checklist of the main factors to take into account in the siting of small-scale and community biomass facilities that require new building/and or the addition of a chimney as follows: ... • Measures should be taken to minimise any visual, odour and noise associated with the operation of the plant and the delivery of feedstocks.”</p> <p>Whilst the amenity of local residents should indeed be protected from any adverse impacts of biomass and anaerobic digestion plants, this protection should be extended to other sensitive nearby land occupiers, including tourism accommodation. Adverse impacts on the amenity of tourism and tourism accommodation sites could result in a decline in their success as visitors are deterred and decide to travel/stay elsewhere. This would have consequences for jobs, supplier expenditure and visitor spending. Bourne Leisure therefore proposes the following amendment to Paragraph 1.60: “A checklist of the main factors to take into account in the siting of a small or medium-scale anaerobic digestion plants is provided below: ...</p>	

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Measures should be taken to minimise any visual, odour and noise impacts on local residents <u>and other sensitive neighbouring land users, such as tourist accommodation</u>, associated with the operation of the plant and delivery of feedstocks.” (proposed amendment underlined)</p> <p>The following amendment to Paragraph 1.69 is also proposed: “A checklist of the main factors to take into account in the siting of small-scale and community biomass facilities that require new building/and or the addition of a chimney as follows: ... Measures should be taken to minimise any visual, odour and noise <u>impacts on local residents and other sensitive neighbouring land users, such as tourist accommodation</u>, associated with the operation of the plant and the delivery of feedstocks.” (proposed amendment underlined)</p> <p>The proposed amendments to Paragraph 1.60 and Paragraph 1.69 will ensure that the Renewable Energy SPG is in-keeping with Policy 30 (Amenity) of the adopted Local Development Plan which states “Development will not be permitted where it has an unacceptable adverse effect on amenity...”</p>	
	Sustainable Design		
83.	4213/Design Natural Resources Wales	<p>• Sustainable Design and Development We support and welcome the submitted SPG and do not have any additional comments to add.</p>	Support noted. No change needed.
84.	3457/Design Friends of the National Park	<p>Comments as follows: Background – where has this guidance come from. It would be useful to have the relevant up to date government guidance and targets form a part of this section. For instance the Climate Change Committee produces regular reports with targets for a Net Zero Wales and the PCNPA similarly sets targets which will affect this guidance. Links to relevant documents, updated as necessary, would seem important. Reference to the biodiversity crisis alongside the climate emergency may</p>	Comments noted. The difficulty with this subject is that the content is continually being updated with new national initiatives. It is proposed that instead of attempting to update the section (which will quickly become outdated) it is instead deleted.

Rep No.	Reference	Representation	Officer Response and Recommendation
		be relevant in this section. Buildings and their gardens have an important part to play and green infrastructure has become a major theme of WG policy – particularly in the built environment. This is covered later on but including it in this introduction would acknowledge its relevance to sustainable design.	
85.	3457/Design Friends of the National Park	Planning context Future Wales 2040 and PPW11 are due to be published very shortly and this section would need to reference them once adopted to ensure it is up to date.	The section that follows 'Planning Context' is also proposed for editing to focus on the Local Development Plan 2 policy hooks.
86.	3457/Design Friends of the National Park	Renewable Energy Item 70. The phrasing of the introduction sounds weak. Could this not be a more robust statement in light of the ambitious targets set for reducing carbon emissions and seeking alternative energy sources? Something along the lines of 'proposals should endeavour to include the installation of appropriate renewable energy systems alongside energy saving design'...As the NPA is aiming for 2030 net zero this should be part of the wider guidance.	The sentence referred to is proposed for deletion from this paragraph (Paragraph 70) and instead a cross reference to the National Park Authority's supplementary planning guidance on renewable energy is provided. This guidance is detailed in its advice to support the development of appropriate renewable energy which should provide a more encouraging introduction. The reference to reducing emissions is best referred to elsewhere and there is already a reference at a more appropriate location - paragraph 36: <i>'36.Designers are encouraged to undertake energy assessments for developments. Technical Advice Note 12 section 5.4 Climate Responsive Development and Sustainable Buildings provides advice on how designers should assess opportunities to reduce the energy requirement and carbon emissions of a development.'</i>
87.	3457/ Design Friends of the National Park	Place and Local/Historic Distinctiveness This section of the guidance suggests a subjective interpretation. Innovation cannot be guided by extant examples and there is a significant risk of experimental mistakes. There are examples of innovative design which some of our members find detract, rather than enhance iconic landscapes, particularly in iconic locations. It would be helpful if the guidance could include reference to such contemporary designs in specific	An amendment is proposed to paragraph 133 which should meet the concerns raised.

Rep No.	Reference	Representation	Officer Response and Recommendation
		landscape and seascape areas being subject to the highest levels of scrutiny.	
88.	3457/ Design Friends of the National Park	<p>Other Documents.</p> <p>Making links to relevant National Policy documents such as energy policy, carbon reduction policies etc. and keeping these updated would be useful, as well as linking directly to the other SPG documents which are often relevant such as Biodiversity, Landscape etc.. and vice versa.</p> <p>Earlier printed versions of the guidance had visual examples of good design which provided some inspiration. Ideally this version could incorporate something similar to showcase best practice and to demonstrate the range of what has been approved and been successful across the National Park.</p>	<p>As advised above the continually changing context in national planning policy etc. -makes it difficult to commit to continuous updates.</p> <p>In addition in terms of hyperlinks these also tend to date. The recent update of the Authority's own website brought this into sharp focus.</p> <p>In terms of good practice this could be included in an update of the guidance when resources are available to undertake such an exercise.</p> <p>No change is proposed at present.</p>
89.	1095/Design Lichfields on behalf of Bourne Leisure	<p>Name of SPG item: Sustainable Design and Development</p> <p>Object: Paragraph 26, Paragraph 43, Paragraph 86, Paragraph 87, Paragraph 92, Paragraph 115, Paragraph 145 and Paragraph 146</p> <p>General Point Throughout the SPG, the National Park Authority recognises that it may not always be possible to provide certain sustainable design requirements. However, Bourne Leisure considers that this recognition needs to be explicit on all of the sustainable development and design requirements within the SPG. The representations reflect this overarching comment.</p> <p>Paragraph 26 Paragraph 26 of the SPG states: "New technologies give us the opportunity to explore radical design solutions and to a point the National Park Authority will embrace such ideas – so long as it can be demonstrated that the outcome will be a high quality addition which will enhance the National Park ethos. Sustainable buildings and developments which are in unsustainable locations, i.e., remote and inaccessible are very rarely appropriate and will be resisted."</p>	<p>Agree with the deletion of this text. The policy position for locating development is set out in the Plan's strategic policies 1 to 7. Policy 7 specifically deals with the need to strictly control development in the countryside with the exception of certain forms of development.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>The statement that “sustainable buildings and developments which are in unsustainable locations, i.e., remote and inaccessible are very rarely appropriate and will be resisted” does not reflect the rural nature of the National Park. The SPG should recognise that there may be circumstances where existing developments need to provide sustainable buildings and developments on-site to reinforce existing operations, regardless of its location.</p> <p>On this basis, Bourne Leisure proposes the following amendment to Paragraph 26 of the SPG:</p> <p>“New technologies give us the opportunity to explore radical design solutions and to a point the National Park Authority will embrace such ideas – so long as it can be demonstrated that the outcome will be a high quality addition which will enhance the National Park ethos. Sustainable buildings and developments which are in unsustainable locations, i.e., remote and inaccessible are very rarely appropriate and will be resisted.” (proposed amendment with strikethrough)</p>	
90.	1095/Design Lichfields on behalf of Bourne Leisure	<p>Paragraph 43</p> <p>Paragraph 43 of the SPG states: “Buildings and extensions should be sited to optimise ‘free’ aspects of climate. These include useful solar gain, shading and sheltering, useful wind and ground conditions. Larger windows should face the south, and smaller windows to the north. Take care, however, to avoid unacceptable overlooking and light spillage.”</p> <p>Whilst it is recognised that siting buildings and extensions to optimise free aspects of climate (for example, solar gain) is important, the siting of development also needs to be balanced with other considerations (for example, efficient use of land, impact on biodiversity etc). Indeed, Policy 29 (Sustainable Design) of the adopted Local Development Plan requires all proposals for development to be well designed in terms of a variety of factors including environment, biodiversity and accessibility, as well</p>	<p>Agree to the need to amend for the reason suggested. The edit proposed is: ‘Buildings and extensions should be sited to optimise ‘free’ aspects of climate <u>where this is compatible with other planning policy considerations including impacts on the environment etc.</u>’</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>as efficient use of energy and resilience to climate change.</p> <p>On the basis of the above, Bourne Leisure propose the following amendment to Paragraph 43: “Buildings and extensions should be sited to optimise ‘free’ aspects of climate <u>wherever possible</u>. These include useful solar gain, shading and sheltering, useful wind and ground conditions. Larger windows should face the south, and smaller windows to the north. Take care, however, to avoid unacceptable overlooking and light spillage.” (proposed amendment underlined)</p>	
91.	1095/Design Lichfields on behalf of Bourne Leisure	<p>Paragraph 86 Paragraph 86 of the SPG states: “The construction industry is a major consumer of land and raw materials and a major contributor to waste production. Around 50% of all global materials are used in construction. Building materials have an embodied energy content related to extraction, processing, manufacture, transportation, maintenance and demolition. Materials should be selected from natural, renewable or recycled resources and be locally sourced. Material waste from construction amounts to around 400 million tonnes in the UK each year.” The guidance in Paragraph 86 stating that construction materials should be selected from natural, renewable or recycled resources and be locally sourced, is restrictive. Whilst the principle is recognised and should be encouraged, as worded it is more restrictive than Policy 25 (Recycled, Secondary and Waste Materials) of the adopted Local Development Plan which states that “The use of recycled, secondary and waste materials, including demolition and construction waste arising from local sources will be supported...”. There needs to be recognition that this may not always be possible. On the basis of the above, Bourne Leisure propose the following amendment to Paragraph 86: “The construction industry is a major consumer of land and raw materials and a major contributor to waste</p>	<p>An edit is proposed to paragraph 86 which is considered to be more in keeping with national planning policy Planning Policy Wales 11 at paragraph 5.12.2 ‘<i>Planning authorities should consider both design choices and site selection and treatment as part of assessing development proposals and encourage a shift towards embedding circularity in the flow of materials. Measures which prevent waste arising include reducing the quantity of wastes produced, the reuse of products, extension of the lifespan of products and considering how materials within a site can be incorporated into new development. Where waste is produced it should be kept separate for reuse or recycling.</i></p> <p><i>All opportunities should be explored to incorporate re-used or recyclable materials or products into new buildings or structures.’</i></p> <p>Edit proposed: ‘<u>All opportunities should be explored to incorporate materials</u> should be selected from natural, renewable or recycled resources and be <u>which are</u> locally sourced.’</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		production. Around 50% of all global materials are used in construction. Building materials have an embodied energy content related to extraction, processing, manufacture, transportation, maintenance and demolition. Materials should be selected from natural, renewable or recycled resources and be locally sourced <u>wherever possible</u> . Material waste from construction amounts to around 400 million tonnes in the UK each year.” (proposed amendment underlined)	
92.	1095/Design Lichfields on behalf of Bourne Leisure	<p>Paragraph 87 Paragraph 87 of the SPG states: “...A Construction Management Plan (CMP) should be submitted with all major planning applications. The CMP should detail how waste will be processed on site, reducing and reusing where possible.”</p> <p>This requirement is not reasonable nor proportionate for all applications categorised as ‘major’ in the Development Management Procedure Order. Given that there is no other definition in the draft SPG we presume that the Order would trigger the requirement for a CMP at application stage. Not all applications that are categorised as ‘major’ would necessarily give rise to the need for a CMP at the time of a planning application submission. The preparation of CMPs is typically undertaken once a contractor has been appointed as details of the construction process can only be established at that stage, something that is most applicable to projects at the smaller end of ‘major’ but would also be relevant to more significant projects too. The speculative preparation of a CMP before planning permission is granted can also be costly to the applicant.</p> <p>Planning Policy Wales (Edition 10) states that “Planning authorities must consider the potential for temporary environmental risks, including airborne pollution and surface and subsurface risks, arising during the construction phases of development. Where appropriate planning authorities should require a construction management</p>	An amendment is proposed to paragraph 87 to ensure compliance with Planning Policy Wales Edition 11, paragraph 6.7.26.

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>plan, covering pollution prevention, noisy plant, hours of operation, dust mitigation and details for keeping residents informed about temporary risks" (paragraph 6.7.26).</p> <p>National policy does not require that a CMP is submitted with a planning application. Many of the considerations will be set out in other assessments within the suite of documents submitted with a planning application e.g. air quality assessment. Within those documents recommendations for mitigation will be made where necessary, particularly for sensitive sites. The requirements for a CMP as a condition is the most appropriate approach for most planning applications.</p> <p>The following amendment to Paragraph 87 is proposed: "...For sensitive locations, a Construction Management Plan (CMP) should be submitted with all major planning applications. Advice should be sought from the NPA in advance of submitting the planning application. The CMP should detail how waste will be processed on site, reducing and reusing where possible (proposed amendment with strikethrough and underlined).</p>	
93.	<p>1095/Design</p> <p>Lichfields on behalf of Bourne Leisure</p>	<p>Paragraph 92</p> <p>Paragraph 92 of the SPG states: "Building materials should be long lasting, locally sourced and from renewable or re-cycled sources; such materials include those salvaged from demolished buildings – this can help tie-in newly constructed buildings with their surroundings..."</p> <p>The guidance in Paragraph 92 stating that building materials should be selected from natural, renewable or recycled resources and be locally sourced, is restrictive. Whilst the principle is recognised and should be encouraged, as worded it is more restrictive than Policy 25 (Recycled, Secondary and Waste Materials) of the adopted Local Development Plan which states that "The use of recycled, secondary and waste materials, including demolition and construction waste arising from local sources will be</p>	<p>Agree to the amendment proposed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>supported...". There needs to be recognition that this may not always be possible.</p> <p>The following amendment to Paragraph 92 is proposed:</p> <p>"Building materials should be long lasting, locally sourced and from renewable or re-cycled sources <u>wherever possible</u>; such materials include those salvaged from demolished buildings – this can help tie-in newly constructed buildings with their surroundings..." (proposed amendment underlined)</p>	
94.	1095/Design Lichfields on behalf of Bourne Leisure	<p>Paragraph 115</p> <p>Paragraph 115 of the SPG:</p> <p>"Rainwater harvesting ('greenwater') for non-drinking purposes and a 'greywater' system (using water from dishwasher and machine washing) for toilet flushing should be considered at an early stage in the design process. Developers should provide occupiers with information on fixtures and fittings designed to reduce the use of water (e.g. dual flush toilets) and details of a rainwater harvesting and/or grey water reuse system."</p> <p>Bourne Leisure recognise that Policy 29 (Sustainable Design) of the Local Development Plan requires all development proposals to be well designed in terms of water and drainage. However, the supporting text of this policy (paragraph 4.152) states that "The aim of this policy is to make more efficient use of water, through for example rainwater harvesting, or employing a sustainable drainage system. There will however, still be a need for some drainage." As such, the Local Development Plan recognises that the use of rainwater harvesting will not be appropriate for all development proposals.</p> <p>On the basis of the above, Bourne Leisure propose the following amendment to Paragraph 115:</p> <p>"Rainwater harvesting ('greenwater') for non-drinking purposes and a 'greywater' system (using water from dishwasher and machine washing) for toilet flushing should be considered <u>where appropriate</u> at an early stage in the design process. Developers should provide occupiers with information on fixtures and fittings designed to reduce</p>	Agree in principle to an edit to this paragraph to refer to feasibility.

Rep No.	Reference	Representation	Officer Response and Recommendation
		the use of water (e.g. dual flush toilets) and details of a rainwater harvesting and/or grey water reuse system.” (proposed amendment underlined and with strikethrough)	
95.	1095/Design Lichfields on behalf of Bourne Leisure	<p>Paragraph 145 and Paragraph 146 Paragraph 145 of the SPG states: “Routes to enable clear links for pedestrians, cyclists and vehicles should be identified and designed at an early stage. Safe routes to public transport should be provided within developments...”</p> <p>Paragraph 146 of the SPG states: “The argument that there is no public transport in an area is not a reason to reduce opportunities for long term sustainable solutions – the ability to access main vehicular routes with sensitive pedestrian links should be possible...”</p> <p>Whilst it is recognised that it is important for development to provide links to public transport where feasible, as drafted, Paragraph 145 and Paragraph 146 do not take into account the largely rural nature of the National Park. Indeed, supporting paragraph 4.321 of the adopted Local Development Plan acknowledges that “...the National Park is predominantly rural in nature and some Centres that have a range of facilities and should be encouraged to grow, fall short on public transport provision, with little prospect for increased bus services...”</p> <p>On the basis of the above, Bourne Leisure proposes the following amendments to Paragraph 145: “Routes to enable clear links for pedestrians, cyclists and vehicles should be identified <u>where appropriate</u> and designed at an early stage. Safe routes to public transport should be provided within developments <u>where possible</u>...”</p> <p>Bourne Leisure also proposes the following amendment to Paragraph 146: “The argument that there is no public transport in an area is not a reason to reduce opportunities for long term sustainable solutions – the ability to access main vehicular routes with sensitive pedestrian links should be possible. People in rural and isolated</p>	<p>The guidance has been drafted within the context of the National Park being a rural area and the need for every opportunity to be taken to encourage active travel and use of public transport above car use as set out in Planning Policy Wales (Edition 11). Properly sustainable development will be future-proofed, including the potential to take advantage of any changes to public transport provision and to encourage residents and visitors to walk and cycle. The suggested amendments to the text are contrary to one of the key objectives of Welsh Government to reduce the need to travel by car and would not create potential to change behaviours.</p> <p>No change is proposed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		areas require more opportunities to use public transport..."	

11 FEB 2021

Awdurdod Parc Cenedlaethol
Arfordir Penfro

Consultation Response

Pembrokeshire Coast National Park Authority and Pembrokeshire County Council
Joint Supplementary Planning Guidance
Historic Environment (Archaeology),



Scheduled Monument North Pembrokeshire

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1 Reason for Responding

1.1 It is evident from documents published on Pembrokeshire County Council's (PCC) Planning and Building Control Applications website, that the impact of development within the setting of scheduled monuments is not fully understood; and based on my understanding of the legislation, policies and guidance underpinning the protection of Wales' historic environment, I am not persuaded that the proposed joint SPG is robust enough to remedy these apparent weaknesses.

1.2 Significant resources have been invested in developing and implementing legislation, policies and guidance in order to help protect, conserve and enhance Pembrokeshire's unique historic environment for future generations. Planning Policy Wales (PPW) provides the national planning policy framework for the consideration of the historic environment and this is supplemented by guidance contained in Technical Advice Note 24 (TAN 24) and Cadw's guidance "Setting of Historic Assets in Wales".

1.3 PPW (Edition 10) 6.1.23 (Archaeological Remains) informs that the planning system recognises the need to conserve archaeological remains and that the conservation of archaeological remains and their **settings** is a material consideration in determining planning applications.

1.4 At a local level, PCC's adopted Local Development Plan (LDP) policy GN.38 (Protection and Enhancement of the Historic Environment) informs that development that affects sites and landscapes of architectural and/or historical merit or archaeological importance, or their **setting**, will only be permitted where it can be **demonstrated** that it would protect or enhance their character and integrity.

1.5 Undoubtedly, the protection of Pembrokeshire's scheduled monuments and their settings from inappropriate development is a national and local objective, and the purpose of my Response is to identify existing non-compliance with relevant policies and guidance, and emphasise the need to strengthen the SPG.

1.6 The SPG acknowledges that TAN 24; The Historic Environment is a "key policy document"; but it is evident from documents relevant to the case studies at paragraphs 6 and 8 of this Response, that applicants and decision makers have strayed from prescribed policies and guidance and have instead adopted ad hoc post-application processes, which are not in the interests of the public. And, I believe it is pointless if the proposed SPG is simply a vocabulary of policies and guidance that applicants and decision makers are already aware of, but simply fail to follow. If my analysis of the two case studies is correct, a key requirement of the proposed SPG is change behaviour; but that change cannot come about unless existing processes are identified, understood, acknowledged and where necessary remedied. It cannot be right that a development within one of Wales' historic landscapes is perceived to require a 35 page Preliminary Ecological Survey and a 21 page Bat Survey but no information regarding the impact of that development on the area surrounding 2 scheduled monuments of national importance. That is the measure of the change required and while I acknowledge the contribution the proposed joint SPG will make to the local planning system, I believe there is much more work to be done.

2 Purpose of Supplementary Planning Guidance

2.1 The authorities inform that the purpose of SPG is to assist **all** applicants seeking planning permission whether their proposed development is large or small in scale and when adopted will have significant weight in deciding whether a proposal can receive planning permission.

3 Scope of Supplementary Planning Guidance (SPG)

3.1 The SPG explains that it provides detailed information as to how planning applications with the potential to impact upon archaeology within Pembrokeshire will be dealt with, and provides information on the way in which Development Plan policies will be applied.

3.2 The proposed SPG was prepared in consultation with Dyfed Archaeological Trust (DAT) who is the authorities' professional advisors on matters relating to the historic environment. DAT is a non-statutory body and while it has considerable archaeological expertise, it does not have the statutory responsibility and authority that Cadw has.

4 Flow-Chart at Page 6

4.1 The flow-chart at Page 6 is misleading on account of it informing applicants to consult with WAT at the pre-application stage and also for the Local Planning Authority (LPA) to consult with WAT at the post-application stage.

4.2 Within the planning system there is a statutory (formal) process (Section 6 Development Managers Manual), and a non-statutory (informal) process. Pre-application consultation should not be confused with the pre-application advice service provided by planning authorities. The former is a statutory service the planning authorities are required to provide to developers to help them to identify what policies, material considerations and constraints will be relevant to a decision on their application.

4.3 TAN 24 4.4 guidance explains that the needs of archaeology and development may be reconciled and potential conflicts between development proposals and the preservation of significant archaeological remains can often be avoided through pre-application discussion. This should be between the applicant, the local planning authority, their archaeological advisors and, in cases where scheduled monuments may be affected, Cadw. Local authorities that do not have in-house archaeological advisors, can draw upon the expertise and advice of the curatorial sections of the Welsh Archaeological Trusts (WAT) - DAT in this instance. DAT is the LPA's advisor and it is the LPA who can draw upon the services of DAT, rather than the applicant. Indeed, TAN 24 1.26 informs that when development is within the setting of a historic asset, the LPA should be able to provide guidance to the applicant during pre-application discussions on the amount of information required to support a proposal. This may include providing a heritage impact statement if the proposal is likely to have an impact on a historic asset. How setting is to be addressed by the applicant should also be considered as part of any pre-application discussions with the authorities.

4.4 TAN 24 guidance is explicit. At the pre-application stage, discussions should be between the applicant, the local planning authority, their archaeological advisors (and if necessary Cadw). The Welsh government's guidance identifies local planning authorities as participants at the pre-application stage, yet the authorities' SPG flow-chart at page 6 excludes the local planning authorities from pre-application discussions. If the authorities wish to digress from national guidance, the reasons should be explained.

4.5 When a development is within a prescribed distance of a scheduled monument, the LPA is required by the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 to consult Cadw (on behalf of Welsh Ministers), yet the SPG confusingly identifies WAT as the LPA's sole consultee at the post application stage.

4.6 The SPG is misleading and fails to fully explain the requirements of PPW, TAN 24, Cadw's guidance "Setting of Historic Assets in Wales"; and the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

5 Developments Affecting Scheduled Monuments and their Settings

5.1 The purpose of TAN 24 is to provide guidance on how the planning system considers the historic environment during development plan preparation and decision making and while setting is primarily visual, it can also include other features like tranquillity, remoteness, physical elements of its surroundings and its relationships with other historic features, natural or topographic features and its wider relationship and visibility within its landscape.

5.2 TAN 24 also provides specific guidance on how scheduled monuments and archaeological remains should be considered. TAN 24 1.19 recognises that designated and registered historic assets form only a small part of the historic environment. Nevertheless, such assets are of national importance and require sensitive consideration when development may affect their integrity or setting; yet the SPG fails to adequately acknowledge these sensitivities and inform applicants and decision makers of the prescribed processes they are required to follow when submitting, considering and determining development within the setting, or within a statutory distance of a scheduled monument.

6 Case Study 1 - Planning application 18/[REDACTED]/PA

6.1 The purpose of this case study is to establish the extent of anomalies in the local planning processes and does not consider the merits/demerits of the development. All the following information is in the public domain but I have redacted that information which might identify the development's precise location.

6.2 This planning application refers to the conversion of an agricultural building to a dwelling and the construction of a 300 metre access track (Figure 1) in north Pembrokeshire.



Figure 1

6.3 The proposed access track requires planning permission on account of the absence of a defined access [Delegated Decision Report (DDR) 3.1].

6.4 The development is located within the Preseli Landscape of Outstanding Historic Interest and is 360 metres from scheduled monument [REDACTED] and 570 metres from scheduled monument [REDACTED]. GN.38 is the relevant LDP policy. Cadw was advised of the development.

6.5 Paragraph 5.0 of the DDR (Figure 2) does not identify GN.38 as a main planning issue.

5.0 MAIN PLANNING ISSUES

- 5.1 - Whether the principle for the conversion of the agricultural building to a residential unit is acceptable- Policy SP 1, SP16, GN.1 and GN.11.
- 5.2 - Whether the development makes a positive contribution to the character and local context of the area- Policy GN.1 and GN.2.
- 5.3 - Whether sufficient amenity can be provided which would not adversely impact neighbouring amenity – Policy GN.1
- 5.4 - Whether an appropriate access which would not have an adverse impact upon highway safety can be provided- Policy GN.1
- 5.5 - Whether the proposal demonstrates a positive approach and wherever possible enhances biodiversity- Policy GN.37

Planning Reference No. 18/PA

Figure 2

6.6 The Decision Notice to the applicant (Figure 3) did not record consideration of LDP policy GN.38 a relevant LDP policy.

Notes to Applicant

1. This Decision Notice grants planning permission. You are advised that it does not constitute approval under the Building Regulations.
2. Having regard to the details of the application proposals, and the relevant provisions of the Local Development Plan for Pembrokeshire (adopted 28 February 2013) as summarised below

Policies SP 1, SP 16, GN.1, GN.2, GN.11, GN.37

Figure 3

6.7 Nevertheless, the LPA did consider the development by way of policy GN.38 and confirmed at paragraph 8 (Figure 4) of the DDR that the development satisfied the requirements of policy LDP GN.38.

The nearest SAM is [REDACTED] This is located 360 metres to the north of the site. It is considered given the separation distance and the intervening hedgerow screening the development would be sufficiently screened from the SAM and not affect its historical merit, archaeological importance or setting. Cadw has no comments to make on the proposed development. It is therefore considered the proposal would satisfy the requirements of policy GN.38 from the adopted LDP.

Figure 4

6.8 Cadw's response is shown at Figure 5.

Advice

Having carefully considered the information provided with the planning application, our records show that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development. We therefore have no comments to make on the proposed development.

Figure 5

7 Case Study 1 - Anomalies

7.1 The LPA's claim that the proposed development would satisfy the requirements of GN.38 is unsustainable. LDP policy GN.38 (Figure 6) is clear. Developments that affects sites and landscapes of historic merit or their setting will only be permitted where it can be **demonstrated** that it would protect or enhance their character or integrity. It is for the applicant to **demonstrate** compliance with policy GN.38 by providing sufficient professional information to enable the LPA to assess the impact of the development and to ensure compliance with policies and national guidance which are material considerations.

GN.38 Protection and
Enhancement of the Historic
Environment

Development that affects sites
and landscapes of architectural
and/or historical merit or
archaeological importance, or
their setting, will only be
permitted where it can be
demonstrated that it would
protect or enhance their character
and integrity.

Figure 6

7.2 In this instance, the proposal did not include information regarding the development's proximity to [REDACTED] and [REDACTED] or an assessment of the impact the development would have on the setting of these 2 nationally important scheduled monuments. As a result of these omissions, the proposal failed to accord with LDP policy GN.38; PPW 6.1.4 (Edition 9 November 2016); LDP policy GN.38 6.156(2); LDP policy GN.38 6.157; TAN 24 1.26; TAN 24 1.27 and Cadw's guidance "Setting of Historic Assets in Wales". The following are my Reasons.

7.3 PPW Chapter 6: The Historic Environment policy 6.1.4 (Figure 7) is clear. Decisions on planning applications **MUST** be based on adequate information provided by the applicant. In this instance, the absence of information in the proposal regarding the impact of the development on the historic environment precluded the LPA from considering the proposal by way of national policy PPW 6.1.4. **The proposal therefore does not accord with PPW 6.1.4.**

6.1.4 Decisions on planning applications and listed building and conservation area consents must be based on adequate information provided by the applicant and any action must be in proportion to the impact of the proposals, and the effects on the significance of the assets and their heritage values.¹

Figure 7

7.4 LDP policy GN.38 6.157 (Figure 8) confirms that sites of national significance are protected by national policy, and **national policy will be a material consideration** when determining planning applications. To accord with LDP policy GN.38 6.157, the proposal must accord with national policy PPW 6.1.4 - a material consideration, but the absence of sufficient information from the applicant precluded the proposal's compliance with national policy PPW 6.1.4. **The proposal does not accord with LDP policy GN.38 6.157.**

6.157 Areas and sites of national significance are protected by national policy including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Landscapes of Historic Interest and Historic Parks and Gardens. In addition to national policy adopted Conservation Area Character Appraisals will also be a material consideration when determining planning applications.

Figure 8

7.5 LDP policy GN.38 6.156(2) (Figure 9) requires the LPA to take account of **the extent** to which the proposed development is likely to impact upon archaeological remains. The proposal does not accord with LDP policy GN.38 6.156(2) on the grounds that the **extent** to which the proposed development is likely to impact upon the setting of the scheduled monuments has not been assessed by way of national guidance TAN 24 or Caw's guidance "Setting of Historic Assets in Wales". **The proposal does not accord with LDP policy GN.38 6.156.**

6.156 In assessing development that may affect archaeological remains the Council will take into account:

2. The extent to which the proposed development is likely to impact upon them

Figure 9

7.6 TAN 24 1.26 (Figure 10) informs that the applicant must **provide sufficient information** to allow the LPA to assess the development in respect of scheduled monuments. The absence of the relevant information cited by the guidance, does not allow the LPA to assess the proposal by way of TAN 24 1.26. **The proposal does not accord with national guidance TAN 24 1.26.**

1.26 It is for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings. These principles, however, are equally applicable to all historic assets, irrespective of their designation. For any development within the setting of a historic asset, some of the factors to consider and weigh in the assessment include:

- The significance of the asset and the contribution the setting makes to that significance
- the prominence of the historic asset
- the expected lifespan of the proposed development
- the extent of tree cover and its likely longevity
- non-visual factors affecting the setting of the historic asset such as noise.

Figure 10

7.7 TAN 24 1.27 (Figure 11) explains that other factors may affect the setting of a historic asset. The absence of sufficient information cited by the guidance regarding other factors which may impact on the scheduled monuments and their settings does not permit the LPA to assess the proposal by way of national guidance TAN 24 1.27. **The proposal does not accord with national guidance TAN 24 1.27.**

1.27 Other factors which may affect the setting of a historic asset include; inter-visibility with other historic or natural features, tranquillity, noise or other potentially polluting development though it may have little visual impact.

Figure 11

Section 2.2 of Cadw's guidance "Setting of Historic Assets in Wales" (Figure 12) informs that applicants should provide the LPA with **sufficient, but proportionate information** to allow the assessment of **the impact of a historic asset and its setting**. The absence of such information does not permit the LPA to assess the likely impact of the proposal on scheduled monuments [REDACTED] and [REDACTED] and their settings by way of Cadw's guidance "Setting of Historic Assets in Wales". **The proposal does not accord with Cadw's national guidance.**

2.2 Submitting a Planning Application

Applicants for planning permission should provide the local planning authority with sufficient, but proportionate, information to allow the assessment of the likely impact of proposals for development on a historic asset and its setting in:

- a World Heritage Site
- a nationally important ancient monument or archaeological remains (scheduled or unscheduled)¹⁶

Figure 12

7.8 Section 4 of Cadw's guidance "Setting of Historic Assets in Wales" (Figure 13) explains the processes required to professionally evaluate the impact of the development on scheduled monuments and their settings. The proposal was not assessed by way of Section 4 of Cadw's guidance "Setting of Historic Assets in Wales" and consequently **does not accord with Section 4 of Cadw's guidance.**

Development within the Setting of Historic Assets

This section outlines the general principles that both assessors and decision makers should consider when assessing the impact of a proposed change or development within the setting of historic assets. Essentially, there are four stages.

Stage 1: Identify the historic assets that might be affected by a proposed change or development.

Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experienced.

5

Setting of Historic Assets in Wales

Stage 3: Evaluate the potential impact of a proposed change or development on that significance.¹⁸

Stage 4: If necessary, consider options to mitigate or improve the potential impact of a proposed change or development on that significance.

Figure 13

7.9 The absence of key professional information precluded the community council and the public from making an informed decision as to the merit of the application. That is unsatisfactory. It is also noted that Cadw dismissed the area as having no scheduled monuments¹ that would be affected when in fact there are 2 and the area is rich in historic merit. For example:-

- i) A deserted settlement 200 metres from the development site (PRN DAT [REDACTED]);
- ii) A standing stone 180 metres from the development site (PRN DAT [REDACTED]);
- iii) A standing stone 220 metres from the development site (PRN DAT [REDACTED]);
- (iv) The development is inside the Preseli Landscape of Outstanding Historic Interest and that Cadw informs that the historic landscape character area was part of the demesne lordship of [REDACTED] and retains elements of the medieval land holdings and enclosures; and that the fields adjacent to the development site have been identified as having evolved out of a system of sub-divided strip-field used for arable farming under medieval Welsh tenure;
- (v) The development is 360 metres from scheduled monument ([REDACTED]) which Cadw informs is of **national importance** for its potential to enhance our knowledge of medieval settlement, organisation and defence; and forms an important element within the wider medieval landscape;
- (vi) Cadw informs that the nearby farmstead at [REDACTED] (400 metres away) and the abandoned farmstead at [REDACTED] (130 metres away) are recorded in the 16th century (and could be much older) and the fields surrounding them are thought to be contemporary.
- (vii) The development is 570 metres from scheduled monument [REDACTED] (PE [REDACTED]) which is of **national importance**.
- (viii) The development's access track (see Figure 1) transects historic bridleway (PP [REDACTED]). This part-paved bridleway predates the existing road to the east and provided access from [REDACTED] to the "supposed" Roman road to the south.

7.10 It has not been **demonstrated** that the development accords with LDP policy GN.38; PPW (Edition 9 November 2016) Section 6.1.4; LDP policy GN.38 6.156(2); LDP policy GN.38 6.157; TAN 24 1.26; TAN 24 1.27 and Cadw's guidance "Setting of Historic Assets in Wales".

8 Case Study 2 - Planning application 18/[REDACTED]/PA

8.1 This application is for a One Planet Development (OPD) in north Pembrokeshire. The site is approximately 180 metres from Scheduled Monument [REDACTED] (PE [REDACTED]) and is within the Preseli Landscape of Outstanding Historic Interest - one of Wales' historic assets. The purpose of this case study is to establish the extent of anomalies in the planning process and does not consider the merits/demerits of the development. PPW Edition 10 (5th December 2018) was relevant at the time the development was considered. All the following information is in the public domain but I have redacted that information which might identify the development's precise location.

8.2 At page 9 of the Management Plan, it states that there were no historic features on site (Figure 14) and consequently provided no information regarding the impact of the development on [REDACTED].

¹ Cadw's Acting Historic Environmental planning Officer advised on the 25/07/2018 that scheduled monuments PE [REDACTED] and PE [REDACTED] were located within a 1km buffer of the application area.

Historic assets: A review of the site on the historic Wales website revealed no historic or archaeological features on the site.

9

Development Application November 2018

Existing buildings and structures: There are no existing buildings. There is one metal cattle crush located at the site entrance which is due to be removed by the previous landowner by the end of 2018 as per a license agreement.

Landscape: features a mixture of improved grassland and mature hedgerows. These are typical characteristics of this area which is further detailed in the LANDMAP survey (see appendix document G2).

Figure 14

8.3 PPW, TAN 24 and Cadw guidance require the applicant to provide information regarding the impact of their proposal on the historic environment. In this instance TAN 6 OPD Practice Guidance 3.8 requires applicants to note cultural features close to the site. Scheduled monument PE and Holy Well (PRN DAT) were not recorded.

8.4 At paragraph 6.15 of the Report to Committee (Figure 15), is a brief account of the scheduled monument, and the impact the development would have on the setting of the SAM (Scheduled Ancient Monument). It was considered that the development would protect the character and integrity of the area as is required by LDP policy GN.38.

6.15 The proposed development would be visible from the SAM, due to its elevated

position, however the development is low impact in nature and seeks to retain existing boundaries with further planting proposed, which once established would minimise the impact of the development. Although, some structures would be visible from the SAM, they would not be seen as unfamiliar in the agricultural landscape. Cadw has further commented that whilst there would be a change to the landscape surrounding the SAM, it would not alter the way it is understood, experienced and appreciated. On that basis Cadw do not consider that the proposed development would have any impact on the setting of this SAM. Due to low impact nature of the proposed development, which is comparable in scale to a farmstead, it is considered that the proposal would protect the character and integrity of the area as required by policy GN.38 (Protection and Enhancement of the Historic Environment) of the LDP.

Figure 15

8.5 On account of the proximity of the development to a scheduled monument, Cadw (on behalf of the Welsh Ministers) was required to respond to the application (Figure 16) .

Assessment

The application area is located some 180m southwest of scheduled monument [REDACTED]. The monument comprises the remains of an earthwork/stone-built enclosure. The date or precise nature of the enclosure is unknown, but it is likely to be later prehistoric or medieval. [REDACTED] is defended by a scarp, now between 1.2m and 2.5m high on the outside and level with the interior. On the west side, the bank is preserved in the field boundary, and is 6ft high with an external ditch.

The proposed development will be clearly visible from the scheduled monument, which is on an elevated position. Once matured, the site will appear from the monument to be mainly woodland. Although some of the structures may be visible, they will not be seen as alien in this agricultural landscape. Therefore, whilst there will be a change to the landscape surrounding the scheduled monument, it will not alter the way it is understood, experienced and appreciated. Consequently, it is our opinion that the proposed development will not have any impact on the setting of scheduled monument [REDACTED].

Figure 16

9 Case Study 2 - Anomalies

9.1 The LPA's claim that the proposed development would satisfy the requirements of GN.38 is unsustainable. It is evident that paragraph 6.15 of the Report to Committee (See Figure 15) is based on Cadw's assessment (Figure 16) of the impact of the development on [REDACTED] and its setting. Yet, Cadw's assessment is not a full objective assessment as is required by PPW 6.1.9. It is a subjective assessment based on a brief internal report (Figure 17), rather than an impact assessment compliant with TAN 24 and Section 2.2 (see Figure 12) and the 4 stages at Section 4 (see Figure 13) of Cadw's own guidance "Setting of Historic Assets in Wales". Cadw's advice does not constitute a compliant assessment.

Advice

This advice is given in response to a planning application [REDACTED] comprising residential and associated development at Land formerly part of [REDACTED].

The application area is located some 180m southwest of scheduled monument [REDACTED]. The monument comprises the remains of an earthwork/stone-built enclosure. The date or precise nature of the enclosure is unknown, but it is likely to be later prehistoric or medieval. [REDACTED] by a scarp, now between 1.2m and 2.5m high on the outside and level with the interior. On the west side the bank is preserved in the field boundary and is 6ft high with an external ditch.

The proposed development [REDACTED] built structures include a single storey dwelling, a workshop, a polytunnel, a potting shed, a cold store, and wood store. The land will be used for a market garden, orchard and woodland.

The proposed development will be clearly visible from the scheduled monument which is on an elevated position. Once matured the site will appear from the monument to be mainly woodland and whilst some of the structures may be visible they will not be seen as alien structures in this agricultural landscape. Therefore, whilst there will be a change to the landscape surrounding the scheduled monument it will not alter the way it is understood, experienced and appreciated. Consequently it is my opinion that the proposed development will not have any impact on the setting of scheduled monument [REDACTED].

[Job Title Redacted] [Name Redacted]

Figure 17

9.2 To comply with LDP policy GN.38 6.157 (see Figure 8), requires compliance with national policy PPW 6.1.9 (Figure 18) given that PPW 6.1.9 is a material consideration.

- 6.1.9 Any decisions made through the planning system must fully consider the impact on the historic environment¹⁰³ and on the significance and heritage values of individual historic assets and their contribution to the character of place¹⁰⁴.

Figure 18

9.3 To comply with LDP policy GN.38 6.156(2) (see Figure 9), the LPA is required to take account of the **extent** to which the proposed development is likely to impact on the archaeological remains². Further, national policy PPW 6.1.4 (Figure 19) explains that the national planning policy framework is supplemented by TAN 24 and Cadw guidance. To satisfy the requirements of national policy PPW 6.1.4, the LPA is required to **fully consider the extent** of the impact of the development on [REDACTED] by way of TAN 24 and Cadw guidance; otherwise the proposed development does not accord with LDP policy GN.38. Cadw's advice at Figure 17 does not satisfy the requirements of TAN 24 and Cadw's own guidance "Setting of Historic Assets in Wales".

green infrastructure, recognising the wide ranging role it can play, as key components of their natural and built fabric. Doing so will maximise health and well-being of communities and the environment.

Recognising the Special Characteristics of Places

The Historic Environment

The historic environment comprises all the surviving physical elements of previous human activity and illustrates how past generations have shaped the world

Conserving and Enhancing the Historic Environment and its Assets

- 6.1.4 The Ancient Monuments and Archaeological Areas Act 1979, Planning (Listed Buildings and Conservation Areas) Act 1990 and Historic Environment (Wales) Act 2016 provide the legislative framework for the protection and sustainable management of the historic environment in Wales. PPW provides the national planning policy framework for the consideration of the historic environment and this is supplemented by guidance contained in Technical Advice Note 24:

andscape is defined in paragraph 6.7.1

w has published a number of studies on the character of towns across Wales which provide further information with regards to the cept of townscape as an important historic urban feature. <https://cadw.gov.wales/historicenvironment/regenerationandsustainability/conservationdirector/townscape>

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The Historic Environment¹⁰¹ and Cadw associated best practice guidance on the historic environment¹⁰².

- preserve the special interest of sites on the register of historic parks and gardens; and

Figure 19

9.4 It has not been demonstrated that the development accords with LDP policy GN.38; PPW Sections 6.1.4 and 6.1.9; LDP policy GN.38 6.156(2); LDP policy GN.38 6.157; TAN 24 1.26; TAN 24 1.27 and Cadw's guidance "Setting of Historic Assets in Wales". Indeed, Annexes A.1.1 and A.1.2 of the Report to Committee (Figure 20) confirms that TAN 24 and Cadw's guidance **were not material considerations**.

² Archaeological remains include their setting (PPW 6.1.23). Archaeological remains include scheduled monuments (PPW 6.1.2)

Annex

A.1 The Development Plan/Other Material Considerations.

A.1.1 The Local Development Plan

- Policy SP 1 Sustainable Development**
- Policy SP 16 The Countryside**
- Policy GN.1 General Development Policy**
- Policy GN.2 Sustainable Design**
- Policy GN.4 Resource Efficiency and Renewable and low-carbon Energy Proposals**
- Policy GN.37 Protection and Enhancement of Biodiversity**
- Policy GN.38 Protection and Enhancement of the Historic Environment**

A.1.2 Other Material Considerations/ Weight Attached

- Planning Policy Wales Edition 10 (December 2018)

Significant weight

- Technical Advice Note 6 – Planning for Sustainable Rural Communities (July 2010)

Significant weight

- Practice Guidance – One Planet Development (October 2012)

Significant weight

Figure 20

10 Other PPW Considerations

10.1 PPW 2.24 (Assessing the Sustainable Benefits of Development) explains that planning authorities should ensure that social, economic, environmental and cultural benefits are **considered in the decision-making process** and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. A key cultural consideration of PPW 2.25 (Figure 21) is whether or not the development protects the areas and assets of historic significance. PPW 2.25 is a material consideration in assessing the impact of the development on the setting of the scheduled monuments and its purpose is to protect Pembrokeshire's unique historic environment. That requires an objective assessment based on policy and guidance, rather than a subjective assessment which does not accord with PPW, LDP policy GN.38, TAN 24 and Cadw's guidance.

- whether or not the development protects areas and assets of cultural and historic significance;

Figure 21

11 Cadw's Role in the Assessment of the Impact of Development on Settings

11.1 Cadw's response to the planning application is shown at Figure 22. In its response, Cadw claims that its statutory role in the planning process is to provide the LPA with an assessment of the likely impact of the proposal on scheduled monuments. I disagree.

Planning Application – Residential and associated development (One Planet Development), Land formerly part of [REDACTED]

Thank you for your letter of 08 February 2019 inviting our comments on the information submitted for the above planning application.

Advice

Having carefully considered the information provided with this planning application, we have no objections to the impact of the proposed development on the scheduled monuments. Our assessment of the application is given below.

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes, where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

Figure 22

10.2 The LPA consulted Cadw under Article 14 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 on account of the development being within 500 metres of a scheduled monument. This legislation require LPAs to consult the Welsh Ministers (in this instance Cadw), before grant of permission, when a development is within a prescribed distance set out in the following table (Figure 23).

(i)	<p>(i) Development which has a direct physical impact on a scheduled monument.</p> <p>(ii) Development likely to be visible from a scheduled monument and which meets one of the following criteria--</p> <p>a) it is within a distance of 0.5 kilometres from any point of the perimeter of a scheduled monument;</p> <p>b) it is within a distance of 1 kilometre from the perimeter of a scheduled monument and is 15 metres or more in height, or has an area of 0.2 hectares or more;</p> <p>c) it is within a distance of 2 kilometres from the perimeter of a scheduled monument and is 50 metres or more in height, or has an area of 0.5 hectares or more;</p> <p>d) it is within a distance of 3 kilometres from the perimeter of a scheduled monument and is 75 metres or more in height, or has an area of 1 hectare or more; or</p> <p>e) it is within a distance of 5 kilometres from the perimeter of a scheduled monument and is 100 metres or more in height, or has an area of 1 hectare or more.</p> <p>(iii) Development likely to affect the site of a registered historic park or garden or its setting;</p> <p>(iv) Development within a registered historic landscape that requires an Environmental Impact Assessment; or</p> <p>(v) Development likely to have an impact on the outstanding universal value of a World Heritage Site</p>	The Welsh Ministers
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Figure 23

10.3 As far as I am aware, Cadw's statutory role as a consultee under Article 14 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended), is to provide a time critical **substantive response**. A substantive response (where an applicant did not seek pre-application advice) is set out under article 15E (Figure 24) of the amended legislation.

[F76 Substantive response to consultation

15E. A substantive response for the purposes of section 100A(2) of the 1990 Act is a response which —

- (a) states that the consultee has no comment to make;
- (b) states that the consultee has no objection to the matters which are the subject of the consultation and refers the person consulting to current standing advice by the consultee on the subject of the consultation;
- (c) advises the person consulting of any concerns identified in relation to the matters which are the subject of the consultation and how those concerns can be addressed by the applicant; or
- (d) advises that the consultee objects to the matters which are the subject of the consultation and sets out the reasons for the objection.]

Figure 24

10.4 In this instance, Cadw raised no objection to the development and also gave its assessment of the impact of the development on the setting of the scheduled monument. Yet, where a consultee offers no objection to the proposal, **the legislation confines a substantive response to one which refers the LPA to current standing advice by the consultee on the subject of the consultation.**

10.5 The stability of standing advice is similar to that of Council standing orders. They are long standing. In this instance Cadw (being part of the Welsh Government's Culture, Sport and Tourism Department, is representing the Welsh Ministers and the Welsh Ministers advice regarding Wales' historic environment is that set out in PPW policies, TAN 24 and Cadw guidance.

10.6 To enable Cadw to refer the LPA to current standing advice on the matter of a development within the setting of a scheduled monument, it is necessary for it to have sight of information required by way of PPW, TAN 24 and Cadw's own guidance. If such information is provided, Cadw's role is to scrutinise it and check compliance. If Cadw has no objection, it must advise the LPA that it has no objection and refer the LPA to PPW, TAN 24, and Cadw's guidance (S15E (b)). If Cadw has concerns (for example the proposal does not accord with PPW policy 6.1.9), those concerns must be reported to the LPA together with an explanation as to how the applicant can address Cadw's concerns (S15E (c)).

10.7 Cadw's role is to inform the LPA. The LPA's role is to assess that information together with information from the applicant, other council departments, statutory bodies, the Community Council and the public. I believe that Cadw's role in its handling of Schedule 4 requests requires urgent review.

12 Conclusions

12.1 When an application for development within the proximity of a scheduled monument is submitted, a professional assessment of the impact of that development on the setting of that scheduled monument is required. That assessment is the responsibility of the applicant.

12.2 At national policy PPW (Edition 10) 6.1.4, footnotes 101 and 102 are cited. Following the link at footnote 102 accesses Cadw guidance "Setting of Historic Assets in Wales". This explains the general principles that must be considered when assessing the impact of a proposed development within the setting of historic assets. Those principles go far beyond Cadw's comments on the impact of the development, yet it is evident from the case studies that the LPA's comments are sufficient. That is why the proposed SPG must be robust enough to eliminate any notion that something other than a professional assessment is "good enough".

12.3 While the 2 case studies examined are not recent, 20/■■■■/PA is.

William O'Brien

15/255

2. Organisation (where relevant)

Please add your comment here...

0/255

3. Address (including Postcode)



4. Telephone No

5. Email (if you have one)

6. Preferred method of contact

Email



7. Date

Object: Historic Environment (Archaeology)

X

9. Please make your response below.

The National Park Authority will acknowledge the representations received.

Representations on Supplementary Planning Guidance will be made publicly available. All comments will be reported to the National Park Authority, and Pembrokeshire County Council's Cabinet, where the Guidance proposed is jointly prepared by both authorities. All commentators will be advised of the outcome of these meetings.

I have submitted my response to the consultation by royal mail special delivery.

BACK

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Pembrokeshire Coast National Park Authority
Pembrokeshire County Council

Pembrokeshire Coast National Park Local Development Plan 2
Pembrokeshire County Council Local Development Plan 1

HISTORIC ENVIRONMENT (ARCHAEOLOGY)

Supplementary Planning Guidance

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

Pembrokeshire Coast National Park Authority
Consultation September 2020
Adoption **approval date**

Pembrokeshire County Council
Consultation October 2020
Adoption **approval date**

Introduction

1. In (September 2020) the Pembrokeshire Coast National Park Local Development Plan 2 (end date 2031) was adopted by Pembrokeshire Coast National Park Authority.
2. In (February 2013) the Pembrokeshire County Council's Local Development Plan 1 (end date 2021) was adopted by Pembrokeshire County Council.
- ~~3. Supplementary Planning Guidance does not form part of the two Local Development Plans, but when adopted has significant weight in deciding whether a proposal can receive planning permission.~~
4. While only the policies in the [adopted](#) development plans have special status in deciding planning applications, (i.e. for the purpose of any determination under the Planning Acts, the determination must be made in accordance with the relevant Plan unless material considerations indicate otherwise), Supplementary Planning Guidance [can](#) be taken into account as a material planning consideration [provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight](#).
- ~~5. In making decisions on matters that come before it, Welsh Government and the Planning Inspectorate will give substantial weight to approved supplementary planning guidance which derives from and is consistent with the approach set out in national policy on the preparation of Local Development Plans. Put simply the requirements of the legislation mean that the following needs to be taken into account when considering a proposal:~~
 - ~~a. Whether the proposal meets the requirements of policies within the relevant Development Plan; and~~
 - ~~b. Weigh up all the other planning considerations to see whether they outweigh the conclusion of the relevant Development Plan.~~
6. This Supplementary Planning Guidance provides detailed information regarding how planning applications with the potential to impact upon archaeology within Pembrokeshire will be dealt with. It also provides information on the way in which Development Plan policies will be applied.

7. This Guidance is intended to assist all applicants seeking planning permission whether their proposed development is large or small in scale. As developers will be expected to meet the costs of archaeological work (see [Appendix 2 Considerations for Undertaking Archaeological Work](#)~~Appendix 2 Considerations for Undertaking Archaeological Work~~), this document will assist in guiding non-specialists through the planning procedures and any archaeological work that may be involved. Information is provided on where to seek information and specialist advice and how to secure the services of professional archaeological contractors.
8. This Guidance document has been prepared in consultation with the Dyfed Archaeological Trust (Development Management section): the authorities' professional advisors on matters relating to the historic environment.
9. This Supplementary Planning Guidance is divided into three parts:
 - a. Section A provides information on getting early advice
 - b. Section B advises on what happens before a planning decision is made
 - c. Section C advises on what happens following a decision being made.
10. The appendices provide more detailed advice on various technical issues involving archaeology in the planning process. They also include a list of useful contacts.

Section A - Where can I get information and early advice?

How are archaeological sites protected?

11. In Pembrokeshire over 530 sites are currently given statutory protection as scheduled monuments under the Ancient Monuments and Archaeological Areas Act 1979, and more recently the Historic Environment (Wales) Act 2016. It is an offence to carry out any work to them without written consent from the Welsh Government. If scheduled sites or their settings are affected by planning applications, Cadw must be contacted¹.
12. 20,867 non scheduled archaeological sites and their settings are currently recorded in the regional Historic Environment Record maintained by Dyfed Archaeological Trust (DAT). These are protected by the planning process with a presumption in favour of preserving, *in situ*, nationally important archaeological sites. Welsh Government guidance is set out in Planning Policy Wales (Chapter 6, Edition [40 11](#)) and Technical Advice Note 24: The Historic Environment (May 2017).
13. This places an onus on developers to consider the impact of their proposals on archaeology. The key to the protection of archaeological sites lies with the Local Planning Authorities working closely with applicants and the regional Welsh Archaeological Trust; in the case of Pembrokeshire Coast National Park Authority and Pembrokeshire County Council this is Dyfed Archaeological Trust.
14. Both Local Development Plans in Pembrokeshire provide for heritage protection. For Pembrokeshire Coast National Park, Strategy Policy 8 'Special Qualities' of Local Development Plan 2 requires the safeguarding and enhancement of the special qualities of the Pembrokeshire Coast National Park. Among these recognised qualities is the historic environment. Policy requires that 'the historic environment is protected and

¹ Cadw is the historic environment service of the Welsh Government. Cadw works to protect the historic buildings and structures, the landscapes and heritage sites of Wales, so that the public can visit them, enjoy them and understand their significance.

Section B What happens before a planning decision?

21. Acting as the professional archaeological advisors to the planning authorities in Pembrokeshire, Dyfed Archaeological Trust - Development Management is notified of all planning applications lodged in Pembrokeshire and makes appropriate recommendations accordingly.
22. Planning authorities expect proposals to take account of archaeology and may require additional information to be provided in support of a planning application. Without this further information they may recommend deferral or refusal of a planning application.
23. This additional information can be provided in the form of desk-based assessment and/or archaeological field evaluation which may also involve geophysical survey. This work will determine the nature of the archaeology and its significance, and could include proposals designed to protect archaeological interests while enabling development. In all cases, archaeological projects must be carried out in accordance with an agreed specification / Written Scheme of Investigation (WSI) prior to the undertaking of any work. Assessment methodologies are fully described in [Appendix 3 Archaeological Work](#).
24. Early consultations, as described above, will give prospective applicants advance information about the archaeological sensitivity of their site. The submission of archaeological information is not a validation requirement from the standard application form. Therefore determination regarding whether archaeological information is adequate would need to be assessed post-registration as part of the consideration of the application (unless made as a local validation requirement for major applications). Therefore pre-application engagement is even more important.
25. Where insufficient information has been provided, the planning authority can decide [to](#) refuse to grant planning permission.
26. Developments which seriously affect nationally important archaeological remains are unlikely to obtain planning permission. For archaeological features of lesser importance, permission may be given providing strategies are put in place to investigate and record in advance of development.
27. At this stage two main options are open to the planning authority; these are **‘preservation *in situ*’** and **‘preservation by record’**.

32. In such cases the planning authority, through the attachment of appropriate planning conditions (see [Appendix 4 Standard Planning Conditions and advice on implementation](#)~~Appendix 4 Standard Planning Conditions and advice on implementation~~) may require the developer to make satisfactory arrangements for the excavation, recording, archiving and publication of the archaeological resource. This detailed excavation and recording work, which may often be time-consuming and expensive, is generally a second-best option and must be carried out prior to the commencement of development.
33. Other planning conditions may require the applicant to carry out building recording in the form of a photographic record prior to and during the course of development or arrange for an archaeological watching brief to be carried out by a professional archaeologist during development.
34. On behalf of the planning authority, Dyfed Archaeological Trust - Development Management will consider the applicant's submitted archaeological scheme and, if satisfactory, the relevant Local Planning Authority will approve the document in writing, allowing the archaeological work to commence. Only when the work is satisfactorily completed will the planning authority be able to discharge the relevant condition.

Appendix 1 Relevant Legislation and Policy Requirements

Scheduled Monuments and Cadw

39. Over 530 monuments and archaeological sites in Pembrokeshire are given statutory protection as Scheduled Monuments under the terms of the Ancient Monuments and Archaeological Areas Act, 1979. These monuments have met certain criteria, which are used for assessing their national importance. Any works that would affect these monuments will require scheduled monument consent from Welsh Government and in such cases the setting of a monument, as well as its physical preservation, are material considerations. Any work carried out to a Scheduled Monument without consent is a criminal offence and is liable to prosecution under the 1979 Act. Scheduled monument consent is separate from planning permission. The granting of planning permission does not confer scheduled monument consent nor vice versa. For a site, which is both scheduled and listed, scheduled monument legislation takes precedence over listed building requirements. Planning authorities would encourage the submission of any necessary scheduled monument consent from Cadw alongside a planning application.
40. The planning authority is required to consult with Cadw (acting on behalf of Welsh Government) on any application likely to affect a scheduled monument or its setting. A planning application which [would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains](#) ~~adversely affects a scheduled monument~~ will normally be refused.
41. Further information on these protected sites can be obtained from Cadw (please see contact details in Appendix 5 Contacts).
42. For certain types of development (listed in Schedules 1 and 2 to **The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016**), formal environmental impact assessment (EIA) may be necessary. Where EIA is required the developer must provide an environmental assessment setting out the information specified in Schedule 3 to the Regulations regarding the site, and the likely significant effects of the proposed development on the environment. This should include information relating to any major effects on material assets and the cultural heritage, such as archaeological features and other human artefacts. This

Appendix 3 Archaeological Work

64. Listed below are the main types of archaeological work required as part of the planning process.

Historic Environment Appraisal

65. An historic environment appraisal (HEA) is a lesser form of desk-based assessment having the single objective of providing an informed answer to the question whether there is an archaeological dimension to be considered in the determination of an application, and whether this needs to be clarified through further investigation. The work normally involves the rapid consultation and professional interrogation of readily available information, including early maps and aerial photographs, held in the regional Historic Environment Record. The appraisal may also involve carrying out a rapid walk-over survey of the site and examining available geotechnical data.

Desk-based assessment

66. Where there is good reason to believe that an application site [may have an adverse impact on the historic environment](#) has significant archaeological potential and information is currently inadequate, the planning authority may direct the applicant to provide a desk-based assessment prior to the determination of an application. Depending on circumstances, this relatively rapid archaeological study may form part of an Environmental Impact Assessment or it may be submitted as a standalone document. The definition of a desk-based assessment is a programme of assessment of the known or potential archaeological resource within a specified area or site on land, inter-tidal zone or underwater. It consists of a collation of existing written, graphic, photographic and electronic information in order to identify the likely character, extent, quality, and worth of the known or potential archaeological resource in a local, regional, national or international context as appropriate. The desk-based assessment should lead to one or more of the following options:

- a. The formulation of a strategy to ensure the recording, preservation or management of the resource.
- b. The formulation of a strategy for further investigation, whether or not intrusive, where the character and value of the resource is not

sufficiently defined to permit a mitigation strategy or other response to be devised.

- c. The formulation of a proposal for further archaeological investigation within a programme of research.
- d. No further work required.

Earthwork Survey

67. In areas of agricultural land that have not been subject to intensive ploughing, archaeological remains may survive as earthworks. Surveying these sites, which may often only have shallow surface features surviving, will normally involve qualified archaeologists using electronic survey equipment to record the earthworks. From the resulting information detailed plans will be produced, which will be considered by the relevant planning authority when determining applications.

Remote sensing / Geophysical Survey

68. Indications of buried human activity can be detected by a variety of non-intrusive scientific methodologies and equipment. The main types of geophysical survey currently being used are magnetometer survey, [and](#) ground penetrating radar [and resistivity survey](#). Site-specific geological conditions can have a major bearing on the quality of the results from such surveys and the type of survey that is appropriate in each circumstance can often only be determined after initial testing of methodologies. This work can often precede a field evaluation as the results of remote sensing can assist in determining the rationale for the number and location of trial trenches that might be required. It is unlikely that remote sensing on its own will provide the required information on an archaeological resource. Invariably, the results of these non-intrusive surveys will need to be tested through the physical process of trial excavation.

Field Evaluation

69. A field evaluation is required where the relevant planning authority has good reason to consider that a significant archaeological resource is present, perhaps as a buried feature, on an application site. An evaluation is normally a limited programme of intrusive fieldwork, which quickly determines the presence or absence of archaeological features and enables an assessment of their relative worth in a local, regional, national or international context as appropriate. The programme of work will result in the preparation of a report and ordered archive.

70. This type of physical or intrusive evaluation may, in certain circumstances, be preceded by a programme of non-intrusive work such as field walking, earthwork survey or geophysics.
71. The intrusive element of the work normally involves trial trenching by means of archaeologically supervised mechanical excavation using machinery with a toothless bucket. The number, location and rationale for these trenches must be agreed with the relevant planning authority and Dyfed Archaeological Trust - Development Management prior to the commencement of the work. The evaluation areas must be cleaned to an appropriate standard to prove the presence or absence of archaeological features and to determine their relative significance. In each area the excavation of the minimum number of archaeological features, to elucidate the character, distribution, extent, date and importance of the archaeological remains is undertaken. ~~In each area sufficient excavation will normally be undertaken to ensure that the natural horizons are reached and proven.~~ An evaluation will excavate deposits to the top of the archaeological horizon or the top of natural horizons – whichever is reached first. If safety reasons preclude manual excavation to natural subsoil, hand auguring may be used to try to assess the total depth of stratified deposits within each area. The resulting report should be presented to the relevant planning authority as further information to inform the planning process.

Building recording

72. Prior to the commencement of alterations to standing buildings of architectural and/or historical interest, including listed buildings, the relevant planning authority will require appropriate building recording to be carried out prior to the commencement of development work. This recording is usually required through the attachment of suitable planning conditions. As there are many forms and levels of building recording work, ranging from detailed and precise building survey through to digital photography, advice should be sought from the Dyfed Archaeological Trust -Development Management Section, who can recommend a form of recording appropriate to circumstances and national standards.

Watching Brief

73. An archaeological watching brief is normally carried out during the course of approved development for the purposes of observing, excavating and recording archaeological remains that come to light during operations such as topsoil stripping, cutting foundation trenches or landscaping. The work

References

Local Development Plans

Pembrokeshire Coast National Park Local Development Plan 2

<https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/>

Pembrokeshire County Council Local Development Plan 1

<https://www.pembrokeshire.gov.uk/adopted-local-development-plan>

Acts

[Historic Environment \(Wales\) Act 2016](#)

Ancient Monuments and Archaeological Areas Act 1979

<https://www.legislation.gov.uk/ukpga/1979/46/contents>

National Policy and Guidance

[Planning Policy Wales - Edition 11 \(gov.wales\)](#)

Technical Advice Note 24: Historic Environment May 2017

<https://gov.wales/technical-advice-note-tan-24-historic-environment>

The National Standard & Guidance to Best Practice for Collecting & Depositing Archaeological Archives in Wales (2017)

<http://www.heritage-standards.org.uk/new-welsh-archaeological-archives-standard-2017/>

Guidance for the submission of data to the Welsh Historic Environment Record - available as a pdf. Via the Dyfed Archaeological Trust website

<http://www.dyfedarchaeology.org.uk/>

Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. Part 1: Parks and Gardens: Carmarthenshire, Ceredigion and Pembrokeshire. Cadw 2002

[Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process. Cadw 2006](#)

Pembrokeshire Coast National Park Authority

Pembrokeshire County Council

Pembrokeshire Coast National Park Local Development Plan 2

Pembrokeshire County Council Local Development Plan 1

BIODIVERSITY:

How biodiversity can be protected and enhanced in the development process

SUPPLEMENTARY PLANNING GUIDANCE

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

Consultation: September 2020

Adoption: **Approval Date**

PEMBROKESHIRE COUNTY COUNCIL

Consultation: **Approval Date**

Adoption: **Approval Date**

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Key principles

18. The key principles to consider are that:

- The Local Planning Authority has a statutory duty to **maintain** and **enhance** biodiversity in the exercise of their functions to demonstrate that they have sought to fulfil the duties and requirements of Section 6 of the Environment (Wales) Act by taking all reasonable steps to maintain and enhance biodiversity in the exercise of their functions³ under the Environment (Wales) Act 2016. Welsh Government has advised planning authorities (23rd October 2019) ‘..where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse planning permission.’
- Local Planning Authorities are expected to promote approaches to development that create new opportunities to enhance biodiversity, prevent losses, reverse declines and compensate for losses that are unavoidable.
- Both Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority are committed to the implementation of the Nature Recovery Action Plan that identifies nature conservation interest and sets aims for future work planning. This work will tie in with the all-Wales NRAP to ensure that planning authorities contribute to their responsibilities and obligations for biodiversity and habitats.
- Certain sites, habitats and species are afforded legal protection. Planning Authorities have an obligation to protect and promote their long-term conservation as part of the planning process. **Tables 1, 2 and 3**, provide a brief overview of these.

International, European and UK legislation

19. The following international and national legislation provides statutory protection to many of the species and habitats in Pembrokeshire:

- **The Conservation of Habitats and Species Regulations 2017 (“The Habitats Regulations”)** – transposes the EU directive on the Conservation of Wild Fauna and Flora (“The Habitats Directive”) (92/43/EEC) and elements of the EU Wild Birds Directive into UK law. This legislation required the establishment of a network of protected sites including SACs and SPAs and affords a high level of protection to identified individual species (such as otters) and species groups (such as

³.PPW [4011](#) ([20182021](#)) Section 6.4.8.

bats). Alongside the Wild Birds Directive (below), these sites form part of a coordinated network of protected areas ensuring the long-term survival of Europe's most valued and threatened species and habitats.

Natural Resources Wales Planning Policy Guidance on Water Quality in Riverine Special Areas of Conservation (SAC)

In January 2021 Natural Resources Wales published an assessment of phosphate levels in Riverine SACs in Wales. The assessment showed a failure to meet targets in the Dee, Cleddau, Wye, Teifi and Usk.

Alongside this data Natural Resources Wales published a Planning position statement and Interim guidance which should both be considered by applicants for proposals within the catchment or which impact on the waterbody of a Riverine SAC. More information is available via the Pembrokeshire County Council website:

<https://www.pembrokeshire.gov.uk/planning-and-ecology/phosphates-guidance-from-national-resources-wales>

- **The EU Wild Birds Directive (2009)** – Regulation 9A places a statutory duty on public bodies for the provision of sufficient diversity and area of habitats for wild birds. Guidance on the interpretation and implementation of Regulation 9A is currently in preparation.
- **UK Wildlife and Countryside Act 1981 (as amended)** – sets the general framework for habitats and species protection and provides statutory protection for certain species additional to those protected under the Habitats Regulations.
- **Wellbeing of Future Generations (Wales) Act 2015** – concerned with improving the social, economic, environmental and cultural well-being of Wales. The Act places a duty on public bodies listed in the Act to carry out sustainable development. In order to do this, public bodies are required to work towards seven well-being goals. All listed public bodies must develop well-being objectives.
- **The Environment (Wales) Act 2016** – puts in place legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way includes:
 - **Biodiversity and Resilience of Ecosystems Duty:** Section 6 under Part 1 of the Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) requiring that public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in doing so, promote the resilience of ecosystems
 - **Sustainable Management of Natural Resources:** sets out Wales' approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory principles

1. *Conserve and enhance the natural beauty, wildlife and cultural heritage*
 2. *Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public*
- **The Environment Act (1995)** – states that the first Statutory Purpose of National Parks is to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park. In addition to this, the Environment (Wales) Act 2016 sets out a biodiversity ‘duty’ for all Local Authorities (including National Park Authorities) in Wales stating that
“Every Public Authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”

National planning policy and guidance

20. The planning process operates in parallel with relevant environmental legislation, to deliver government commitments. The significance of the above legislation and commitments is reflected in the importance accorded to biodiversity in national planning policy. Planning Policy Wales (PPW), Edition [10-11](#), [2018-2021](#), emphasises the importance of integrating nature conservation or biodiversity into all planning decisions at an early stage, whilst looking for development to deliver social, environmental and economic objectives together over time. Specific guidance in relation to nature conservation is available in chapter six of PPW [10-11](#) and TAN 5 – Nature Conservation and Planning (2009).
21. The British Standards Institute (BSI) has published the British Standards for Biodiversity – Code of practice for planning and development (BS 420202:2013). The document amalgamates best practice and gives recommendations and guidance for those in the planning and development sectors whose work might affect or have implications on biodiversity. PCC and PCNPA will take into account the British Standard for Biodiversity and would encourage those in the planning, development and environmental sector to adopt the processes and recommendations as published.
22. The Nature Recovery Action Plan for Wales is a live document and its ambition is to ‘reverse the decline in biodiversity for its intrinsic value, and to ensure lasting benefits to society’. It links to and complements The Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016, and sets out how current and proposed action will contribute to reversing the loss of biodiversity across Wales.

24. Pembrokeshire County Council's Local Development Plan (LDP) (excluding the area of the Pembrokeshire Coast National Park) expands upon the principles in Planning Policy Wales [40-11](#) and The British Standards for Biodiversity, through policies which seek to ensure that development protects and enhances biodiversity and encourages proposals that achieve this.

Pembrokeshire County Council Local Development Plan - List of most Relevant Policies

SP.1 Sustainable Development – an overarching strategic policy that relates to all proposals. It aims to ensure that all development is sustainable.

GN.1 General Development Policy – provides a framework for the evaluation of potential development impacts. **Criterion 4** ensures that development will respect and protect the natural environment, including protected habitats and species. Any development proposal must demonstrate that it protects the natural environment and, where possible, enhances it.

GN.3 Infrastructure and New Development – makes provision for contributions to be sought, where appropriate and necessary, in conjunction with development proposals including for biodiversity.

GN.37 Protection and Enhancement of Biodiversity – requires all new developments to demonstrate a positive approach to maintaining and, where possible, enhancing biodiversity. It aims to ensure that species and their habitats as well as wildlife and landscape features in both countryside and urban environments are protected from the potentially adverse effects of development and requires that where any such effects are anticipated, appropriate mitigation and/or enhancement should be made.

Pembrokeshire Coast National Park Local Development Plan – List of most Relevant Policies

Policy 1 National Park Purposes and Duty - the overarching policy of the Plan fundamental to conserving and enhancing the wildlife National Park.

Policy 8 Special Qualities - identifies the need for development to positively enhance the National Park's ecosystems and components that underpin them. Links between sites are important

Policy 9 Light Pollution seeks to ensure the minimal impact of lighting on the night sky.

Policy 10 Sites and Species of European Importance

Policy 11 Nationally Protected Sites and Species

Policy 12 Local Sites of Nature Conservation – protection of areas of local importance – including habitats and species of principal importance to Wales, areas providing connectivity.

Policy 30 Sustainable Design

Policy 33 Surface Water Drainage

Table 1. Protection of Sites			
Importance	Feature	Legislation & Policy	Implications for Development
International	National Site Network Special Area of Conservation (SAC) Special Protection Area (SPA) Ramsar 'Wetland of International Importance'.	The Conservation of Habitats and Species Regulations 2017 (as amended) – The "Habitats Regulations" Ramsar Convention (1971)	Sites are protected against potentially damaging operations. Strong presumption against damaging development. SPA's and SAC's known collectively as ' Natura 2000 sites'. the national site network
National	Sites of Special Scientific Interest (SSSI) National Nature Reserves (NNR)	Wildlife and Countryside Act (1981) (as amended) National Parks and Access to the Countryside Act (1949) or Wildlife and Countryside Act (1981) (as amended)	Sites are protected against potentially damaging operations. Strong presumption against damaging development.
Local	Local Nature Reserves (LNR) Sites of Importance for Nature Conservation (SINC)	National Parks and Access to the Countryside Act (1949) Planning Policy Wales edition 40-11 (2018)	Sites to be protected and enhanced. Planning Policy Wales 40-11 (6.3.12 6.4.20)

Table 2. Protection of Habitats			
International Importance	Habitats of European Importance (see Priority Habitats)	The Conservation of Habitats and Species Regulations 2017 (as amended)	Habitat may be a designated feature of a Natura 2000 site National site network site (see above)
National or Local Importance	Hedgerows	Hedgerow Regulations (1997)	Certain hedgerows are protected from removal Hedgerows to be protected and enhanced
	Species and habitats of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales And/or included in Pembrokeshire NRAP	Environment (Wales) Act 2016, Section 7 Pembrokeshire Nature Recovery Action Plan	Planning consideration
	Trees	Town and Country Planning Act 1990, Town and Country Planning (Trees) Regulations 1999. Town and Country Planning (Trees) (Amendment) 2012. Town and Country Planning (Trees) (Amendment) (Wales) Regulations 2017	An order made by the local planning authority which makes it an offence to cut down, top, lop, uproot, wilfully damage or wilfully destroy a protected tree without the planning authority's permission.

Protected Species

27. The presence of protected species will not usually prevent development entirely but steps will need to be taken to ensure there is no damage or disturbance to the species and to secure the protection of the species. It is the applicant or developer's responsibility to ensure they comply with relevant legislation and licensing. Failure to do so can be a criminal offence which may result in the person(s) concerned liable to a heavy fine and/or a prison sentence; for example, maximum penalties for destroying a bat roost are six months' imprisonment and/or a £5,000 fine per individual animal harmed. It is the responsibility of the Local Planning Authority to consider species and habitats when determining a planning application and to ensure that there are no unnecessary adverse impacts.
28. Where licences have been obtained (see paragraph ~~54~~⁵⁷) in respect of protected species, these will also usually require some level of post-development survey and monitoring.

European Protected Species

29. There are a number of European Protected Species in Pembrokeshire; ~~these include otters, bats (all species) and dormice.~~ The Local Planning Authority will consider the potential impact of the proposed development upon these species based on information provided by the applicant to support their application. This may include a Protected Species or Extended Phase 1 Habitat Survey, proposals for compensation, mitigation or enhancement and drawings to support the inclusion of such features. Consultation may also take place with Natural Resources Wales (NRW). If this information is not provided and is considered necessary as a requirement for the purposes of planning, then this may be requested.

Protected Sites

30. European Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), are designated under the EC Habitats Directive as sites that will make a significant contribution to conserving habitats and species identified as most in need of conservation. There are a number of these sites in Pembrokeshire; certain forms of development impact upon habitats and/or species for which these sites are designated.
31. Before approving any plan or project the Local Planning Authority, as the competent authority, must assess whether the proposals are likely to have a significant effect upon the European protected sites (SACs/SPA's). The first stage of the Habitats Regulations Assessment is to screen the proposal through a Test of Likely Significant Effect (TLSE) as required under regulation 63 of the Conservation of Habitats and Species Regulations. If it is considered that the proposal is likely to have a significant effect an Appropriate Assessment will be carried out. If mitigation options cannot avoid

survey requirements see the following sections on 'Protected Species' and 'Protected Sites' as well as at the Local Planning Authority websites (See [Appendix 2: Local Planning & Biodiversity Contacts](#)~~Appendix 2: Local Planning & Biodiversity Contacts~~).

37. Pre-application discussions with statutory consultees such as Natural Resources Wales is also recommended, in addition to non-statutory consultees if appropriate.

Information and Surveys

38. The level of information should be necessary, relevant and proportionate to the development and adequate to inform the determination of the application. If an ecological survey is required it will need to be undertaken and incorporated into the early stages of a project. This will enable design work to take full account of constraints and opportunities on site.
39. Surveyors should use nationally recognised survey guidelines/methods where available. A suitably qualified ecological consultant will need to be employed to carry out any necessary survey(s). There are seasonal and time constraints to ecological surveying, which should be carefully planned into the development process. **Appendix 3** sets out Ecological Survey Seasons. If you are unsure about survey requirements, pre-application advice should be sought.
40. Survey information should include data sourced from the Local Records Centre - West Wales Biodiversity Information Centre.
41. In some cases where there is not a reasonable likelihood for protected habitats or species to be present or affected by development, survey work may not be needed. However, additional information may still be requested by the Local Planning Authority in order to assist with the determination of the planning application.

42. It is important that the findings of any survey work are taken into careful consideration during the design stage. Good survey work will provide details of both the constraints and opportunities on a site. A proposal must show how it has been designed in such a way so as to [avoid or](#) minimise any adverse effects on those habitats or species present. This may involve incorporating appropriate new features or habitats within the development or site.
43. Fig .2 above outlines a two-stage process for design using the five principles of planning for biodiversity. Stage 1 relates specifically to addressing the impacts of the proposed development. Logical progression through the avoid, mitigate, compensate hierarchy is aimed at achieving no loss of biodiversity as a result of development. Proposed enhancements are not considered at this stage. Stage 2 aims to achieve a net biodiversity gain by identifying opportunities for enhancing biodiversity as part of the proposed development.

Avoid

44. Wherever possible, development should avoid impacting on any wildlife feature. The primary objective should be to **avoid** negative impacts by designing the site around the wildlife features. For example, if the development site includes a pond or existing hedgerow try to incorporate it into the layout. Should avoidance not be possible, justification is required as to why adverse impacts cannot be avoided.

Mitigate

45. Where avoidance is not possible then the design should aim to mitigate any negative impacts. You will need to take account of all the potential effects of a development and make sure that mitigation is appropriate to the proposal and species and habitats present. Incorporate all aspects of mitigation onto drawings prior to submission

Compensate

46. In some cases it is not possible to avoid or mitigate adverse impacts on species or habitats. In exceptional circumstances either on- or off-site **compensation** is required. Compensation either restores or recreates the wildlife feature damaged by a development; however, some habitats and features, such as ancient woodland, cannot be compensated for.

Enhance

47. Planning Policy Wales, Local Development Plan policies and the Environment (Wales) Act place a duty on the Local Planning Authority to enhance. Welsh Government has advised planning authorities (23rd October 2019) ‘..where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material

- Agreement with a conservation organisation, housing association, the Council or local residents group where they are prepared to take on management responsibility.

Post application stage licencing

56. Where licences have been obtained in respect of protected species, these will also usually require some level of post-development survey and monitoring.

European Protected Species Licencing

57. If development or an activity will affect European Protected Species then it is likely a licence will be required from Natural Resources Wales to allow otherwise illegal activities to go ahead. If the development requires planning permission, this must be granted prior to obtaining a licence. Once approved it is the applicant's responsibility to apply for a licence and further information can be found by searching 'European Protected Species licence' on the Natural Resources Wales website. See [Appendix 4: Bats – European Protected Species: Trigger List](#)~~Appendix 4: Bats—European Protected Species: Trigger List~~ for details on submitting planning applications where bats may be affected.
58. It is important to note that planning permission (or a permitted development right) does not negate the need for a development licence before work starts on site. Working without a development licence could lead to the disturbance of the species or destruction of their roost or resting place, resulting in a wildlife crime being committed and subsequent prosecution.
59. In some cases appropriate (sympathetic) design and mitigation will avoid the need for a licence – work can be managed so that it does not cause disturbance or harm. In other cases, mitigation will not remove the need for a licence, but will form part of the licence conditions, as well as being covered by planning condition(s).
60. A Trigger list has been produced by the Bat Conservation Trust that lists development situations where bats are likely to be found. This can be found in [Appendix 4: Bats – European Protected Species: Trigger List](#)~~Appendix 4: Bats—European Protected Species: Trigger List~~.

UK Protected Species

61. NRW is responsible for issuing licences for works which may interfere with UK protected species, including badgers and/or their setts in the course of development. The consideration and granting of such licences are separate from the process of applying for planning permission, but the Local Planning Authority must take account of the legislation throughout the development process.

SuDS:

62. Sustainable Drainage Systems store or re-use surface water at source by decreasing flow rates to watercourses, and water bodies and by using natural processes to filtrate and purify water in both urban and rural areas. They aim to manage rainfall by simulating natural processes through the use of natural features in the landscape and vegetation. Surface water run-off and pollution are major causes of flooding and damage to river ecosystems. SuDS have a multitude of benefits including flood risk reduction, improved water quality, opportunities for habitat creation and expansion, and enhanced biodiversity through the creation of freshwater habitats.
63. From 7th January 2019, all new developments of more than 1 house (construction area of 100m² or more) require Sustainable Drainage Systems for managing surface water. Local authorities are the SuDS Approving Body (SAB), in this case Pembrokeshire County Council.
64. Types of SUDS include:
- **Swales** Shallow channels, sometimes vegetated which either store runoff water, or move it to the next stage of the water treatment process.
 - **Attenuation ponds** Provide stormwater attenuation and treatment. They are designed to support emergent aquatic vegetation which also aids in effective and natural water filtration.
 - **Rain gardens** A shallow depression located on a steep slope with absorbent yet free-draining soil planted with vegetation that can withstand occasional inundation. They slow down water flow and filter runoff.
 - **Green roofs** can help to slow down the flow of surface water. See below for more information.
 - **Pembrokeshire hedgebanks (see [Appendix 9 Hedgebank](#) [Appendix 9 Hedgebank](#)):** The hedgebank feature increases the immediate surface area for interception and typically incorporates plants and trees to intercept rainfall and absorb water. The bank can also act as a physical, semi-permeable barrier that can protect adjacent land from flooding.

Peatlands

New paragraph: Peatlands hold large stocks carbon. When peat is left undisturbed the carbon is protected. Problems only arise when the peat body is drained, burnt or over-grazed. Appendix X provides more advice on peat management procedures with the aim of preventing disturbance in the first instance.'

- UK Native Wildflower Roof
- Pembrokeshire Coastal Roof

71. Both of these species mixes are more tolerant to desiccation and can cope during dry periods and salt incursion. More details can be found in [Appendix 5: Advice Note relating to Green Roof Species Selection in Pembrokeshire](#)~~Appendix 5: Advice Note relating to Green Roof Species Selection in Pembrokeshire.~~

Biodiversity Enhancement Features

72. Welsh Government has advised planning authorities (23rd October 2019) ‘..where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse planning permission.’⁷

73. Enhancements for wildlife will be sought where appropriate from all scales of development. The level of enhancement required will be proportionate to the type, scale and impact of development. There are many ways of incorporating features into planning schemes to enhance biodiversity and these range from small-scale actions for individual species to larger habitat creation schemes. Examples of how a site and/or development may be enhanced could include:

- providing bird boxes around the site or for specific species (e.g. swallows, barn owls, house sparrows); For longevity and ease of maintenance we advise the use of boxes which are integrated into buildings rather than wooden boxes which are externally fixed.
- providing roosting opportunities for bats (bat tiles, access to soffits, bat roosts);
- planting a native species hedgerow/trees or creating a wildlife pond and scrapes;
- establishing a wildflower meadow area or planting a native woodland area or copse: See [Appendix 8: List of native trees and shrubs](#)~~Appendix 8: List of native trees and shrubs~~
- creating wildlife corridors/linear features to improve connectivity;
- creation of hedgebanks
- creating buffer zones along watercourses.

⁷ Biodiversity enhancements: guidance for heads of planning | GOV.WALES

Table 4: Habitat Biodiversity Enhancements

Habitat type	Enhancement suggestions
Waterways/water bodies	<ul style="list-style-type: none"> Create new water bodies (e.g. creation of ponds, scrapes and semi-permanent water bodies). Creation of suitable otter and amphibian habitat including the installation of otter holts and the retention and buffering of riparian corridor. Plant native pond plant species (list included in Appendix 6: List of native pond plants in Pembrokeshire).
Buildings or other structures	<ul style="list-style-type: none"> Install barn owl boxes, erect bird boxes, erect bat boxes, and install bat bricks and bat lofts. Create green roofs (see guidance in Appendix 5: Advice Note relating to Green Roof Species Selection in Pembrokeshire).
Grassland	<ul style="list-style-type: none"> Extend area of wildflower meadow, coastal grassland or wetland scrapes for wading birds and access to mud for nesting swallows and house martins and create green roof.
Hedgerows and hedge banks	<ul style="list-style-type: none"> Improve connectivity for wildlife by connecting new to old ones and repair damaged sections of existing features. Plant native hedgerow species using a minimum of 5 species including berry or seed bearing species. A list of native species can be found in Appendix 8: List of native trees and shrubs.
Woodlands	<ul style="list-style-type: none"> Manage existing woodland for biodiversity by reducing the levels of grazing animals and introducing management techniques such as coppicing, where appropriate and create buffers for woodland edges.
Urban	<ul style="list-style-type: none"> Plant native trees and hedgerow shrubs to provide food and shelter for birds and small mammals. Encourage pollinating insects by planting native wildflower seed mixes, install bat and bird boxes (see species enhancements) and maintain and enhance areas of semi-natural habitat (such as grassland, hedgerows, wooded areas, and water bodies).

Table 5: Species Biodiversity Enhancements

	Species	Enhancement suggestions
Birds (Recommended material - woodcrete for	Blue and great tits	<ul style="list-style-type: none"> Installation of bird boxes 2-3 metres above ground level. Can be attached onto small buildings or onto tree trunks. Blue and Great tits - nest box locations to be

buffer between wind turbine blades and linear features such as trees and hedgerows on proposals outside of the National Park. Careful consideration will need to be given to the location of access points and connections to grid, so as to reduce the potential impact on habitat features or species.

79. If you are intending to submit a planning application for a renewable energy scheme the Local Planning Authority recommends undertaking an ecological walk-over survey as a minimum. However, additional survey work identified from the preliminary survey may need to be undertaken prior to the submission of a planning application, for example in relation to bats or birds. In the case of renewable energy projects applicants should take early advice from their ecologist and the planning authority on survey requirements.

External lighting

80. Light pollution can have a serious impact on the natural patterns that govern wildlife behaviour such as mating, migration, sleeping and eating. Lighting in itself is not a problem; it only becomes a problem where it is excessive, poorly designed or badly installed. The impact of lighting on wildlife can be reduced by:
- Using lights only where and when needed
 - Lighting the target area only
 - Shining lights downwards
 - Using sensor lights that come on only when necessary
81. Where light-sensitive protected species such as bats are involved, appropriate design of lighting to avoid or minimise adverse impacts will be a statutory requirement and may be subject to licensing by the NRW. More information on this can be found in the table below and [Appendix 4: Bats – European Protected Species: Trigger List](#)~~Appendix 4: Bats – European Protected Species: Trigger List.~~
82. In considering schemes which involve the installation of external lighting, their impact on the night sky and biodiversity will be considered. Obtrusive lighting can be defined as *“the unnecessary brightening of the night sky as a result of upwardly directed light. Usually light pollution is caused by poorly designed development schemes and inappropriate or poorly installed lighting equipment”*.
83. There are several forms of light pollution, which may have a detrimental impact on wildlife and the open countryside. Illuminating a bat corridor may cause disruption, alter feeding behaviour and even abandonment of the nearby roosts. Many nocturnal animals may have their sleep patterns disrupted, encouraging them to forage in the artificial light and expose themselves to predators that use light to hunt. Some species are intolerant of increased lighting and may abandon their dependent young resulting in population declines and displacement.

Table 6: Measures which can be taken to reduce light intrusion or pollution

Lighting considerations	Measures to avoid or mitigate impacts
Location of lights	Include a lighting plan. Reduce the number of lights. Carefully consider the location of lights, do not locate near sensitive features such as hedgerows or trees. Avoid light-spill on bat roost access points.
Type of lights	Include pictures of products. Choose downward facing lights, no upward spill. Flood-lights are generally unacceptable.
Height of light installation	Consider use of low-level lighting where possible. State maximum height of light fixtures.
Direction and angle of installation	State beam orientation. No lighting above horizontal.
Lumens	State lumens. Recommended 600 lumens maximum in the National Park. 2,700 Kelvin lights are recommended.
Reduction of light output	Use PIR or timer switches.
Lighting accessories for reducing obtrusive lighting	Cowls. External or internal louvres. Shields or hoods. Reflectors. Application of film to windows to reduce glow.
Implications of lighting on designated sites	If the proposed scheme is on or adjacent to a designed site, lighting only permitted where demonstrated to be essential.
General	Locate away from reflective surfaces, such as windows. Use low energy or LED bulbs where possible.

84. A Supplementary Planning Guidance document for the appropriate use of lights will be prepared by Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority. More information can be found on the Institution of Lighting Professional's website and the Bat Conservation Trust Guidance Note 08/18 Bats and artificial lighting in the UK.

One Planet Development

85. Planning Policy Wales [11](#) defines One Planet Development (OPD) as "development that through its low impact either enhances or does not significantly diminish environmental quality". ([Paragraph 4.2.38](#))

86. A Biodiversity Survey is required to accompany an OPD application and an audit forms part of the required management plan listing broad habitats, records of important flora and fauna and any statutory designations on the

Appropriate Assessment

A statutory assessment which is undertaken by a competent authority in respect of plans or projects which are likely to have a significant effect on a [national site network site](#) ~~Natura 2000~~ site (see HRA definition).

Biodiversity

The richness and variety of living things (plants, birds, animals, fish and insects etc.) which exist in a given area, and the habitats which support them.

Biodiversity Action Plan/Local Biodiversity Action Plan (BAP/LBAP)

The UK's Biodiversity Action Plan recognises priority habitats and species and plans and works towards their conservation. Local Biodiversity Action Plans are the mechanism for local delivery.

Development Licence

Term used within this document to refer to a protected species licence (European or UK protected species) obtained by a developer for the purposes of undertaking a development.

Ecosystem

A system that includes all living organisms (biotic factors) in an area as well as its physical environment (abiotic factors) functioning together as a unit.

European Protected Species (EPS)

Species protected by the Conservation (Natural Habitats etc) Regulations 2010.

Habitat

The place in which a particular plant or animal lives. Often used in the wider sense referring to major assemblages of plants and animals together.

Habitat Regulations Assessment (HRA)

HRA is required under the European Directive 92/43/EEC and is an assessment of the impacts of implementing a plan or project on a ~~Natura 2000~~ [national site network site](#). Its purpose is to consider the impacts of a land use plan against conservation objectives of the site and to ascertain whether it would adversely affect the integrity and features of the site.

Invasive Non Native Species (INNS)

Any species which is outside its natural range in Pembrokeshire but which is present and capable of surviving and reproducing in the County and which causes damage to natural ecosystems or human economic, social or health interests by threatening native biodiversity.

Local Development Plan

The Statutory Development Plan for each Local Planning Authority area in Wales, as required under Part 6 of the Planning and Compulsory Purchase Act 2004.

Local Nature Reserve

An area designated for its local importance in terms of nature conservation.

Local Planning Authority

A planning authority responsible for the preparation of the Local Development Plan and for determining planning applications.

Mitigation

The term mitigation in the document refers to action taken which offsets and minimises potential impacts on any wildlife features.

National Nature Reserve (NNR)

An area designated for its national importance in terms of nature conservation, and managed in accordance with a nature reserve agreement with landowners and occupiers.

Natural Resources Wales (NRW)

Is the Statutory Nature Conservation Organisation for the Welsh Government. Its purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

Planning obligation

A commitment made by a developer under Section 106 of the Town and Country Planning Act to undertake certain actions (on- or off-site) necessary to make a development acceptable in planning terms.

Planning Policy Wales (PPW)

Current land use planning policy is contained in Planning Policy Wales [10-11](#) ([2018 2021](#)) which provides the strategic policy framework for the effective preparation of local planning authorities' development.

Pembrokeshire Nature Partnership (PNP)

A collective of organisations which includes public bodies, private sector companies, charities, community groups and individuals with an interest in the protection and enhancement of natural resources in Pembrokeshire. The partnership has agreed to be responsible for the delivery of the Pembrokeshire Nature Recovery Action Plan.

Site of Special Scientific Interest (SSSI)

A site identified under the Wildlife and Countryside Act 1981 as an area of special interest for wildlife or geological features.

Special Area of Conservation (SAC)

A site designated under the European Habitats Directive (enacted in the UK through the Conservation of Habitats and Species Regulations 2017 (as amended), to protect internationally important natural habitats and species.

Special Protection Area (SPA)

Sites classified under the European Community Directive on Wild Birds (enacted in the UK through the Conservation of Habitats and Species Regulations 2017 (as amended), to protect internationally important bird species.

Supplementary Planning Guidance (SPG)

Appendix 10 Useful Websites and Documents

Useful websites:

[Amphibian and Reptile Conservation Trust](#)

[Association of Local Environmental Records Centre](#)

[Bat Conservation Trust](#)

[Buglife – The Invertebrate Conservation Trust](#)

<https://www.buglife.org.uk/>

[Bumblebee Conservation Trust](#)

[Butterfly Conservation Wales](#)

[Carmarthenshire County Council](#)

[Ceredigion County Council](#)

[Chartered Institute of Ecology and Environment Management](#)

<https://cieem.net/about-cieem/>

[Joint Nature Conservation Committee \(JNCC\)](#)

[Natural Resources Wales:](#)

[Pembrokeshire Nature Partnership:](#)

[Pembrokeshire Coast National Park Authority](#)

[Pembrokeshire Local Biodiversity Action Plan](#)

[Plantlife Cymru](#)

[Royal Society for the Protection of Birds \(RSPB\)](#)

[The Association of Local Government Ecologists](#)

[The Wildlife Trust of South and West Wales](#)

<https://www.welshwildlife.org/>

[Wales Biodiversity Partnership:](#)

[West Wales Biodiversity Information Centre](#)

<https://www.wwbic.org.uk/>

Useful Documents

[British Standards for Biodiversity Code of Practice for planning and development \(BS 420202:2013\), British Standards Institute.](#)

[Local Development Plan \(2013 2021\) Pembrokeshire County Council](#)

[Pembrokeshire Coast National Park. Local Development Plan](#)

[Planning Policy Wales, Edition 40-11 \(20182021\), Welsh Government](#)

[Technical Advice Note 5, Nature Conservation and Planning \(2009\), Welsh Government](#)

<https://gov.wales/technical-advice-note-tan-5-nature-conservation-and-planning>

[Bat Surveys for Professional Ecologists: Good Practice Guidelines, Edition 3 \(2016\), The Bat Conservation Trust.](#)

[The Town and Country \(General Permitted Development\) Order 1995 \(as amended\).](#)

Checked May 2020

Other useful information

Ecological Survey Report Guidance and a list identifying local Licensed Bat Surveyors and Ecologists is available from the Pembrokeshire County Council Specialist Planning Ecologist on request. Contact details can be found in [Appendix 2: Local Planning & Biodiversity Contacts](#)~~Appendix 2: Local Planning & Biodiversity Contacts~~. Please note that inclusion

Developments on Peat and Off-Site Uses of Waste Peat

Legislation & Policy

The **Environment (Wales) Act 2016** introduces the concept of the “sustainable management of natural resources”. This means—

- (a) using natural resources in a way and at a rate that promotes achievement of the objective of meeting the needs of present generations of people without compromising the ability of future generations to meet their needs, and contributing to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015
- (b) taking other action that promotes achievement of that objective, and
- (c) not taking action that hinders achievement of that objective.

One of the 5 Key Planning Principles set out in **Planning Policy Wales Edition 10** is making best use of resources. The efficient use of resources, including land, underpins sustainable development.

The planning system has a vital role to play in making development resilient to climate change, decarbonising society and developing a circular economy for the benefit of both the built and natural environments and to contribute to the achievement of the well-being goals. The national sustainable placemaking outcomes which lead from this principle include making the best use of resources and the prevention of waste.

Peat Resource

Peat is a body of sedimentary material, usually dark brown or black in colour, comprising the partially decomposed remains of plants and organic matter that is preserved in anaerobic conditions within an essentially waterlogged environment.

There are two principal types of peat:

1. The upper (acrotelm) layer which is quite fibrous and contains plant roots etc. Acrotelmic peat ~~is in good condition, is wet. This is the part of the peat profile that may dry out during the summer or times of drought. Water moves relatively quickly through acrotelmic peat. relatively dry and has some tensile strength.~~

2. The lower (catotelm) layers are highly amorphous, with very high water content and tend to have very low tensile strength. Water moves relatively slowly through catotelm layers. The structure of catotelmic peat tends to disrupt completely on excavation and handling.

Peatlands hold large stocks of ~~poorly protected~~ carbon. When peat is left undisturbed the carbon is protected. Problems only arise when the peat body is drained, burnt or over-grazed and. The excavation of peat will result in large carbon losses from the excavated peat and also the areas affected by drainage. Minimising peat excavation will reduce these potential carbon losses and consequently reduce the carbon payback period associated with developments on peat.

Excavated peat will be classified as waste if it is discarded or the holder intends to or is required to discard it. Unless the waste peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to Natural Resources Wales (NRW) regulatory controls.

The recommended management options for developments on peat are based on the the waste hierarchy:

Prevention

The best management option for peat on a development site is to design the development so that it is left in situ wherever possible.

This can be done through the use of forward planning, comprehensive on-site investigations and the use of Peat Management Plans or Natural resource management plans and assessment of alternative construction methods e.g. piling. The early consideration of these techniques will allow developers to prevent/minimise the excavation of peat and the production of waste peat.

On-site use

If the excavation of peat cannot be avoided, developers should prioritise the use of excavated peat on-site in the first instance, by exploring restoration opportunities - catotelmic peat is very good for use in peat dams, contour bunds etc, whereas acrotelmic peat is not. in the first instance. These activities should minimise carbon loss and maximise ecological benefit. It is acknowledged that the potential use of peat, especially catotelmic peat, for construction or restoration is limited due to its physical characteristics. However, there are a number of on-site activities which may involve the use of peat in construction or reinstatement e.g. restoration of hardstanding areas, borrow pits, road verges, peatland restoration and peatland translocation.

Off-site options: Uses of peat & recycling/recovery/treatment

After on-site uses have been exhausted, excavated waste peat may be suitable for use off-site within the local area. This should be identified in the peat management plan, including estimated volumes for each use, destination, final intended outcome and justification of suitability of the peat material and the need for the specified quantities of peat material.

Storage

Highly organic materials such as peat can have a devastating impact on watercourses if they wash off from storage areas. It is also important to use the peat as soon as possible after excavation (to minimise the exposure of the peat to the air) and to maintain moisture conditions in the peat to keep carbon losses to a minimum.

Disposal

Disposal of peat, particularly catotelmic peat, can lead to a number of issues due to its very low tensile strength and high water content e.g.

- It is likely to have a very low load bearing capacity, making it a hazard to people or animals walking on it if not used correctly. There are examples of peat dams and low contour bunds having been constructed from catotelmic peat. Livestock use these dams and bunds to move around on however, they are no more than 30cm high.
- Slides or movement are highly likely and can be caused by heavy rainfall but only if used incorrectly and not re-profiled to allow vegetation colonisation.
- Potential for contaminated run-off again if used incorrectly.

Peat arising and requiring management as a waste within a development will require characterisation and consideration of its condition upon excavation.

The propensity of the waste peat to flow will be a key characteristic in determining whether it can be landfilled i.e. if it is classified as a liquid it cannot be landfilled without some form of pre-treatment.

Pembrokeshire Coast National Park Authority

Pembrokeshire Coast National Park Local Development Plan 2

Caravan, Camping and Chalet

Supplementary Planning Guidance

Consultation Approval Date: September 2020

Adoption Approval Date:

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

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- Figure 2 Landscape sensitivity for static large scale development
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- Figure 8 Landscape capacity for caravan and camping development

Individual maps for each Landscape Character Area

1. Introduction

- 1.1. This supplementary planning guidance supports Policy 41 Caravan, Camping and Chalet Development of the Pembrokeshire Coast National Park Local Development Plan 2.
- 1.2. The guidance provides a systematic assessment of the capacity of existing Landscape Character Areas (LCAs) in the National Park to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. It provides advice on an LCA basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated.
- 1.3. Very small scale development such as a single caravans in a curtilage and matters relating to licensing of sites are outside the scope of this guidance.
- 1.4. The National Park has two statutory purposes, the first of which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. In order to achieve this, Pembrokeshire Coast National Park Authority (the NPA) seeks to conserve and enhance the special qualities of the National Park. The overarching qualities of particular relevance to this guidance are the area's coastal splendour, distinctive settlement character, rich historic environment, remoteness, tranquillity and wildness and space to breathe. Each individual landscape character area (LCA) has its own special qualities and characteristics.
- 1.5. The second Purpose is to help people understand and enjoy the special qualities of the National Park. The many visitors attracted to the Park has led, over time, to significant development of caravans, camping and chalet developments – many of which precede the National Park designation. Whilst such developments have supported the local economy, they have in some instances also detrimentally impacted the very qualities that visitors seek to enjoy. When considering applications for new sites or changes to existing sites, where there is an irreconcilable conflict between the Purposes, the Sandford Principle gives supremacy to the 1st protectionist Purpose. In pursuance of the twin purposes the Authority has a duty to seek to foster the economic and social well-being of local communities within the national park. This guidance seeks to assist the National Park Authority to direct existing and new caravan, camping and chalet development to appropriate locations within the context of the Purposes and Duty.

~~The character and nature of the National Park attracts many visitors. This has led to significant development of caravans, camping and chalet developments in places which in turn have detrimentally affected the qualities of the National Park that visitors seek to enjoy. This development has supported the economy of the area, especially in the summer months. In carrying out the two primary purposes the NPA has a duty to seek to foster the economic and social well-being of local communities within the National Park. There is therefore a balance to be struck in conserving and enhancing the National Park as the prime purpose on the one hand whilst supporting the local economy on the other. This guidance seeks to assist the National Park Authority in guiding existing, and possibly new, caravan, camping and chalet development to achieve this balance.~~
- 1.6. This draft supplementary planning guidance is subject to public consultation before it is considered by the NPA and formally adopted. As the guidance is based on the NPA's evidence for the Local Development Plan 2 Examination's Policy 41 Caravan, Camping and Chalet Development it will be a material planning consideration in decision-making in the interim, i.e. during the consultation period.
- 1.7. The guidance is structured to explain the method used (Chapter 2), give an overview of the issues encountered in the assessment (Chapter 3), summarise the sensitivity and capacity of the LCAs (Chapter 4), and then to assess each LCA in turn (Chapter 5).
- 1.8. The appendices deal with a glossary of terms (**Appendix A**), ~~overall guidelines for caravan, camping and chalet development (Appendix B)~~ and the statutory definition of a caravan (**Appendix CB**).

2. Method

- 2.1. The method for this guidance has built on the principles of sensitivity and capacity assessment of the landscape to accommodate various types of development without detrimental impact.
- 2.2. The terms used in the study can be found in the glossary in **Appendix A**. This uses terms primarily defined by the latest landscape and seascape character guidance. Other sources include the European Landscape Convention, and LANDMAP, the Welsh landscape appraisal tool.
- 2.3. The relevant guidance and references taken into account by this guidance are as follows, in date order:
- Topic Paper 6 Techniques and criteria for judging Capacity and Sensitivity, Countryside Agency, Caryl Swanwick and LUC, 2004.
 - Guidelines for Landscape and Visual Impact Assessment Edition 3, 2013 (GLVIA3).
 - Landscape character assessment for Pembrokeshire Coast National Park, adopted as SPG in June 2011.
 - Seascape character assessment for Pembrokeshire Coast National Park, adopted as SPG in December 2013.
 - The LANDMAP Information System, Countryside Council for Wales, March 2012.
 - An approach to landscape character assessment, Natural England, 2014.
 - Landscape and seascape sensitivity studies in Wales and England.

Guidance process and method

- 2.4. A flow diagram of the process is shown in **Box 1**. This shows the series of tasks and reporting undertaken for guidance preparation.
- 2.5. A desk study was carried out bringing together all relevant landscape, seascape and constraints mapping data. Using this context, the National Park was visited by an experienced landscape and seascape assessor with another landscape architect with similar knowledge of the area acting as a sounding board. Every landscape character area was visited and assessed and three boat trips were made to assess the views towards and along the coast from adjoining seascape character areas. These trips covered the south east coast between Amroth and Lydstep, St Brides Bay and Fishguard Bay / Newport Bay. All site visits were carried out in late July and August in order to ensure that the peak season for seasonal camping was covered, and tents and touring caravans would be most apparent.

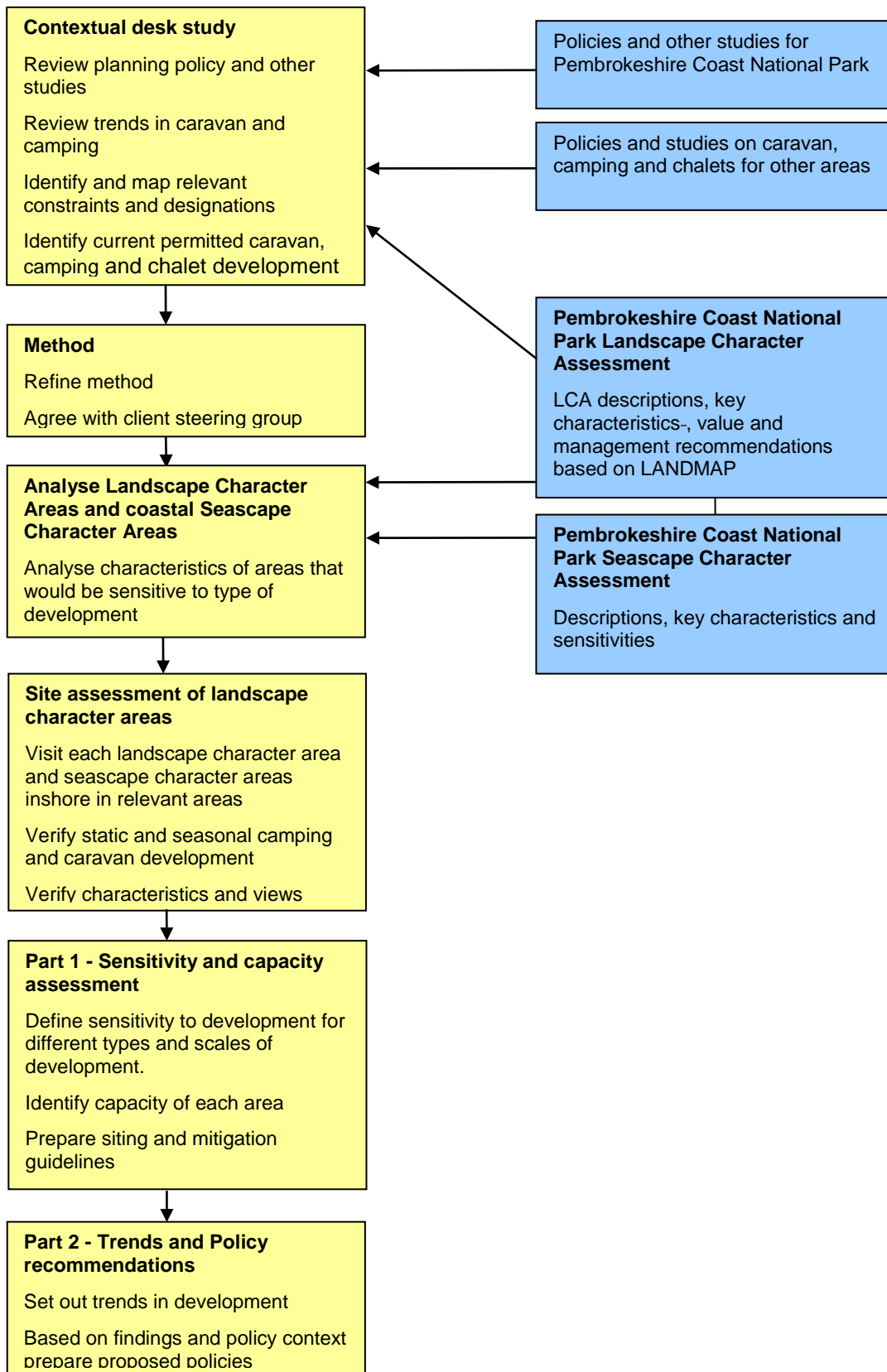
Definitions

- 2.6. **Sensitivity** is taken to mean the extent to which a landscape character area (LCA) can accommodate a particular type and scale of change without adverse effects on its character. Sensitivity is derived from an appraisal of its landscape character sensitivity and visual sensitivity to development (or susceptibility as coined in GLVIA3) ~~and its~~ [intrinsic value](#).

Box 1: Summary of study process

LANDSCAPE SENSITIVITY & CAPACITY ASSESSMENT

SEPARATE CONTEXTUAL ASSESSMENTS



- 2.7. **Capacity** is taken to mean the amount of change that an LCA can accommodate without adverse changes to character or key characteristics or undue consequences for the

achievement of landscape policies in the area. It takes into account existing development within the area as well as the sensitivity and deals with the issue of potential cumulative effects at a strategic level. Therefore an area which has a substantial amount of existing development may be considered to be at capacity even though its characteristics may be able to accommodate certain types of development. An area which has no existing development with characteristics which are highly sensitive would also have no capacity for development.

Definition of Different Types of Development

- 2.8. In order to establish the sensitivity and capacity of the landscape to accommodate different types of camping and caravan development it is necessary to categorize different types of development. There are static caravans, chalets, touring caravans, camping and glamping units such as pods. Some sites have a combination of these. The layout, density, unit colour and other factors can also influence the impact any given site. Whilst there are an increasing number of different types of accommodation it is not clear how successful the new types will be in the long term. The glamping market is moving swiftly with some creative options being pursued to capture the imagination of visitors. These include gypsy caravans, vintage camper vans and more exotic options such as grounded aircraft and upturned boats. It is therefore necessary to simplify the assessment focusing on the basic principles of whether a site / development is permanent throughout the year, i.e. static or seasonal, and its size / scale. These are set out below. The other factors that influence how a site should look and fit into the landscape are dealt with in the general guidelines in [Appendix B Section 6](#) and guidelines for each LCA. The size thresholds were derived from a preliminary assessment of a sample of different developments in the Pembrokeshire landscape taking into account the scale and pattern of the landscape.

Table 1 Definition of Different Types of Development

Type of development and site size	Definition
Static: large	Static units including caravans, chalets and pods / hard structure glamping options on a site above 3 hectares.
Static: medium	Static units including caravans, chalets and pods / hard structure glamping options on a site >0.5Ha- 3 hectares.
Static: small	Static units including caravans, chalets and pods / hard structure glamping options on a site 0-0.5 hectares.
Seasonal: large	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents above 3 hectares.
Seasonal: medium	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents >0.5- 3 hectares.
Seasonal: small	Seasonal units including touring caravans, tents, soft structure glamping options such as yurts, tepees and safari tents 0-0.5 hectares.

- 2.9. There are some important provisos to be made to the above development definitions:

- Touring caravans left on site for the majority of the summer season or stored *in situ* over winter are generally considered to be the equivalent of static caravans in terms of this assessment of sensitivity.
- Soft structure glamping options such as yurts, tepees and safari tents are assumed to be seasonal, being removed from the site for the majority of the year. They are also assumed to be free-standing without hard features such as timber

capacity for further development is very limited and that the existing development should be improved in order to enhance the area.

- 2.13. Capacity is derived from consideration of its sensitivities to different levels and types of development and the existing caravan and camping development within that area, and visible from it. The capacity assessment is divided into the capacity for new sites, the extension to existing sites increasing the number of units and the extension of existing sites in order to improve the existing with no overall increase in the number of units. The latter option offers the opportunity to improve the 'offer' of a given site. The capacity for improvement of sites is also set out.

- 2.14. The definitions for capacity are as follows:

Table 4 Capacity definitions

<i>Level</i>	<i>Definition</i>
No capacity / At capacity	The area is unable to accommodate further / any units as it has a high or high / medium sensitivity and / or it has substantial caravan / chalet / camping development which already significantly cumulatively adversely affects character and conflicts with the primary purpose of the National Park.
Limited	The area is only able to accommodate very limited further units relating to existing sites as it has a high or high / medium sensitivity and / or it has caravan / chalet / camping development which already significantly cumulatively adversely affects character and conflicts with the primary purpose of the National Park.
Moderate	The area may be able to accommodate some further units in some defined situations as it has between high / medium and medium / low sensitivity and / or it has some caravan / chalet / camping development which adversely affects character in parts and conflicts with the primary purpose of the National Park.
Substantial/moderate	The area is able to accommodate further units in many situations without adverse effects on character as it has between low and medium / low sensitivity and / or it has caravan / chalet / camping development which slightly adversely affects character and slightly conflicts with the primary purpose of the National Park.
Substantial	The area is able accommodate a substantial number of further units without adverse effects on as it has between low and medium/low sensitivity and/or it has caravan / chalet / camping development which does not affect character and is consistent with the primary purpose of the National Park.

Guidance

- 2.15. Where there is potential for new units to be accommodated within an area guidance is given on how to minimise landscape, seascape and visual effects. A generic list of siting guidance is located in **Appendix B Section 6** which should be taken as applying throughout. The relevant guidance for each LCA is also set out in the sensitivity and capacity assessment for each. This leads to some repetition within the report but hopefully avoids doubt.
- 2.16. Guidance on mitigation indicates how to enhance existing sites and how to achieve positive designs in new sites or extensions. As with the siting guidance an overall generic list is located in **Appendix B Section 6** but the relevant factors are also listed for each LCA.

3. Overview of issues and sensitivities

- 3.1. The assessment has revealed a number of issues. These are:

4. Summary of recommendations for Landscape Character Areas

- 4.1. The main recommendations of this guidance are generally to site any new development away from the coast and Preseli Hills and not intervisible with them, and with no significant historic or nature conservation constraints, so that the key qualities of the National Park are conserved. Where there is existing development close to or on the coast, it is recommended that the sites are enhanced in places by revising the layout of static caravans in particular, placing preferably amenity space or seasonal units in more prominent locations within the sites.
- 4.2. Some LCAs which have a significant density of existing development are considered to be at capacity with some existing sites in need of enhancement. Other areas without development are considered to be highly sensitive and their character should be maintained without new development. These LCAs include the islands and exposed headlands and hills such as Carn Llidi. There are other LCAs where there is limited potential for new sites, usually small scale, or extending existing sites.
- 4.3. A key principle is that if the guidance considers that a particular type of development at a particular scale is acceptable in a given LCA, for example a new site of small scale seasonal development, this does not mean that, if implemented, that it would be appropriate or acceptable to increase the size or intensify the use of the site in future. The sensitivity and capacity in the LCA would remain unchanged as it is based on the National Park's qualities and principles.
- 4.4. A summary of the sensitivity and overall capacity findings for each LCA is set out below with summary figures indicating the pattern of sensitivity and capacity. Each LCA is considered individually in **Section 5**.
- 4.5. These assessments provide a broad context for considering proposals and therefore due to the wide range in the size, nature and location of sites, it is important that individual sites are considered on a case-by-case basis taking account of the site's individual circumstances and features.
- 4.6. The tailored recommendations and guidance for each landscape character area takes precedence over the generic guidance on siting, mitigation and enhancement which is set out in [Appendix B Section 6](#) of this report.
- 4.7. The cumulative effects of developments would also need to be considered including impacts on neighbouring planning authority areas.

Landscape Character Area

LCA 20: Trefin

Related Seascape Character Areas

SCA 11: Strumble Head to Penbwhdy

SCA 13: Penbwhdy to Penllechwen

SENSITIVITY					
Summary of sensitivity	The sensitivity of the area lies in the almost entirely undeveloped indented coastal edge, the long sea facing slopes, the small scale field pattern, the sparse settlement pattern and tranquillity, the historic interest along the coast and to the north and west, and the coastal views in particular from Garn Fawr and Carn Llidi.				
Sensitivity to types of development	Low	Medium/low	Medium	High/medium	High
Static: large					
Static: medium					
Static: small					
Seasonal: large					
Seasonal: medium					
Seasonal: small					
Key sensitivities	<p>The following characteristics make the area sensitive to development:</p> <ul style="list-style-type: none">• An almost entirely undeveloped indented coastal edge and cliffs with semi-natural vegetation including coastal heath.• Sea facing slopes adjacent to the coast and steep incised valley slopes.• The open character of much of the landscape with low hedge banks or hedges and dry stone walls allows long views along the coast and out to the sea.• Very small scale field pattern in places especially west of Trefin.• Sparse rural settlement pattern generally limited to farmsteads, with a few distinctive villages including Porthgain and Trefin with their associated Conservation Areas.• Historic interest includes prehistoric promontory forts and industrial heritage particularly between Porthgain and Abereddy. Many features are scheduled monuments.• The far western part of the area and the far northern part lie within Registered Landscapes of Historical Interest, St David's Headland and Ramsey Island, and Pen Caer: Garn Fawr and Strumble Head respectively.• Internationally important coastal habitats.• Much of the coast is tranquil with limited vehicle access.• Key unspoilt views are from Garn Fawr and Carn Llidi outside the area and from the Pembrokeshire Coast Path including around popular locations such as Porthgain, Abereddy, Trefin and Abercastle. Views are also possible from kayaks and other occasional leisure sailors.• The value of the area lies in its National Park status and the historic and nature conservation features mentioned above.				
Development in area	There are a small number of small/medium sites including statics and chalets back from the coast with a larger seasonal site close to the coast. The developments tend to be further to the south/west rather than north/east.				
CAPACITY					
Capacity of LCA for development or further development/units	Substantial	Substantial/moderate	Moderate	Limited	No capacity / At capacity
Summary of	There is very limited capacity for new sites. As any new development would be likely to be noticeable it would be limited to small/medium seasonal sites in discreet locations only to				

capacity	<u>minimise impact on the landscape character</u> . There is potential for improvement particularly to the larger seasonal site close to the coast.
Capacity for new sites	There is very limited capacity for new sites. As any a New development would be likely to be noticeable it would be limited to small/medium seasonal sites in discreet locations only.
Capacity for extensions to existing sites (increasing accommodation)	There does not appear to be potential for extension to existing sites without increasing the impact on landscape character.
Capacity for extensions to existing sites (to improve sites without increase in accommodation)	There is no apparent capacity to extend existing sites as this would only increase the spread of effects.
Capacity for changes within existing sites	There is potential for some improvements.
GUIDANCE	
Siting guidance specific to LCA	<ol style="list-style-type: none"> 1. Site in areas enclosed by landform, trees or mature hedges both within and adjacent to a site. 2. Site within field boundaries, not spilling into adjacent fields. 3. Site on plateau or flat land, provided there is enclosure. 4. Site units close to the edges of enclosing elements such as field boundaries or woodland rather than in the middle of fields or spaces. 5. Associate with farm complexes if possible, especially small sites. 6. If siting in woodland, ensure some woodland is protected and a management strategy is in place to maintain tree cover between units over time eg phased regeneration/replanting. 7. Site adjacent to modern development. 8. Avoid national or locally designated nature conservation sites or reserves. 9. Avoid unimproved pasture and semi-natural habitats including coastal heath and ancient woodland. 10. Avoid siting static units in or in the setting of Conservation Areas, scheduled ancient monuments and listed buildings and their curtilages.
Mitigation guidance specific to LCA	<ol style="list-style-type: none"> 1. Avoid placing static caravans very close to boundaries or road edges so planting can help to buffer effects. 2. Restrict static and touring caravans to the edge of fields. 3. Restrict units to the edge of fields. 4. Change colour of caravans to less obtrusive shades and tones, e.g. light green, to reduce visual impact. Avoid white roofs and variety of finishes and colours across sites unless well integrated by intervening planting. 5. Maintain or change lighting to downward facing and low level lighting to minimum areas where necessary. 6. Enhance the appearance of site facilities e.g. to give a rural farm complex appearance, and mitigate effects with planting where appropriate. 7. Maintain, reinstate and enhance the field boundary pattern including traditional hedgebanks, hedgerows and trees to help filter or screen views to sites. 8. Conserve woodland planting in and adjacent to sites to maintain and enhance screening. 9. Improve the biodiversity within sites to enhance habitats and wildlife corridors e.g. semi-natural habitats, watercourses and field boundaries etc. 10. Improve site entrances to have a rural character, using rural detailing, materials and planting reflecting the vernacular, avoiding large or obtrusive signs, bright

6. General Siting, Mitigation and Enhancement Guidance

Note: The siting guidance should be read in conjunction with the recommendations and guidance for each individual landscape area. The latter takes precedence.

Siting guidance

In siting units avoid the following:

1. Tranquil, undeveloped areas
2. Islands
3. Coastal edge
4. Coastal slopes most intervisible with the sea.
5. Prominent sites.
6. Skylines, especially visible from the coastal edge.
7. Eroding gaps between settlements and other developments.
8. National or locally designated nature conservation sites or reserves.
9. Unimproved pasture and semi-natural habitats including coastal heath, sand dunes and ancient woodland.
10. Siting static units in or in the setting of Conservation Areas, Registered Parks and Gardens, scheduled monuments and listed buildings and their curtilages.
11. Siting static units in Registered Historic landscapes where possible.
12. Siting in areas with key views such as to and from the sea, from the Pembrokeshire Coast Path and other long distance paths and from sensitive areas of designated open access land.
13. Siting in distinctive landscapes or seascapes and those with a strong sense of place.

If the proposal meets the above criteria, the following more detailed siting requirements apply:

1. Site in areas enclosed by landform, trees or mature hedges both within and adjacent to a site.
2. Site within field boundaries, not spilling into adjacent fields.
3. Site on plateau or flat land, provided there is enclosure.
4. Site units close to the edges of enclosing elements such as field boundaries or woodland rather than in the middle of fields or spaces.
5. Associate with farm complexes if possible, especially small sites.
6. Site on improved pasture, arable or brownfield land.
- ~~Avoid unimproved pasture and semi-natural habitats including coastal heath, sand dunes and ancient woodland.~~
7. If siting in woodland, ensure some woodland is protected and a management strategy is in place to maintain tree cover between units over time e.g. phased regeneration/replanting.
8. Site adjacent to modern development.

Mitigation and enhancement guidance

1. All landscape improvements should be in character with the LCA in which they are located. For instance, trees and high hedges are not appropriate in open landscapes with low hedge banks, or in open moorland.
2. Reduce density of static caravan development creating green space with native tree planting between caravans, especially where caravans or chalets 'stack up' slopes.
3. Avoid placing static caravans very close to boundaries so planting can help to buffer effects.
4. In principle, restrict static, touring caravans and other 'hard' units to the edge of fields, and tents to the edge of fields in prominent coastal locations.
5. Consider static unit layouts which are less rectilinear with curving access roads and spaces.
6. In more prominent locations/fields and those directly by the coast consider removing static units and using the space for amenity e.g. open space recreation, play, dog walking.
7. In more prominent locations/fields and those directly by the coast consider removing static units and using the space for lower impact units, preferably seasonal tents, yurts or safari tents.
8. Change colour of caravans to less obtrusive shades and tones, e.g. light green, to reduce visual impact. Avoid white roofs and variety of finishes and colours across sites unless well integrated by intervening planting.
9. Limit the extents of decks and associated timber railings and avoid wide decks on sloping ground to avoid unsightly areas beneath.
10. Consider native shrub planting to soften the hard appearance of decks.
11. Maintain or change lighting to downward facing and low level lighting to minimum areas where necessary.

12. Place solar panels in discreet locations, preferably at a low level, to avoid wide visibility.
13. Where possible, place small scale wind turbines so they are visually associated and integrated with the structure/s they are serving.
14. Enhance the appearance of site facilities e.g. to give a rural farm complex appearance, and mitigate effects with planting where appropriate.
15. Maintain, reinstate and enhance the field boundary pattern including traditional hedgebanks, hedgerows and trees to help filter or screen views to sites.
16. Increase native tree and shrub planting within sites to break up the development and mitigate visual impact.
17. Replace fences with native hedges or hedgebanks.
18. Replace conifer hedges with native hedges.
19. Replace conifers with deciduous native trees.
20. Conserve woodland planting in and adjacent to sites to maintain and enhance screening.
21. Improve the biodiversity within sites to enhance habitats and wildlife corridors e.g. semi-natural habitats, watercourses and field boundaries etc.
22. Improve site entrances to have a rural character, using rural detailing, materials and planting reflecting the vernacular, avoiding large or obtrusive signs, bright lighting, bright colours and over-large areas of hard standing.
23. Improve pedestrian access out of sites to places of interest whilst using discreet and appropriate detailing of stiles and gates.

Note: The siting guidance ~~only applies to landscape character areas where potential for sites have been identified and~~ should be read in conjunction with the recommendations and guidance for each individual landscape area, which The latter takes precedence.

Siting guidance

In siting units avoid the following:

- ~~1.14. Tranquil, undeveloped areas~~
- ~~2.15. Islands~~
- ~~3.16. Coastal edge~~
- ~~4.17. Coastal slopes most intervisible with the sea.~~
- ~~5.18. Prominent sites.~~
- ~~6.19. Skylines, especially visible from the coastal edge.~~
- ~~7.20. Eroding gaps between settlements and other developments.~~
- ~~8.21. National or locally designated nature conservation sites or reserves.~~
- ~~9.22. Unimproved pasture and semi-natural habitats including coastal heath, sand dunes and ancient woodland.~~
- ~~10.23. Siting static units in or in the setting of Conservation Areas, Registered Parks and Gardens, scheduled monuments and listed buildings and their curtilages.~~
- ~~11.24. Siting static units in Registered Historic landscapes where possible.~~
- ~~12.25. Siting in areas with key views such as to and from the sea, from the Pembrokeshire Coast Path and other long distance paths and from sensitive areas of designated open access land.~~
- ~~13.26. Siting in distinctive landscapes or seascapes and those with a strong sense of place.~~

If the proposal meets the above criteria, the following more detailed siting requirements apply:

- ~~1.9. Site in areas enclosed by landform, trees or mature hedges both within and adjacent to a site.~~
- ~~2.10. Site within field boundaries, not spilling into adjacent fields.~~
- ~~3.11. Site on plateau or flat land, provided there is enclosure.~~
- ~~4.12. Site units close to the edges of enclosing elements such as field boundaries or woodland rather than in the middle of fields or spaces.~~
- ~~5.13. Associate with farm complexes if possible, especially small sites.~~
- ~~6.14. Site on improved pasture, arable or brownfield land.~~
- ~~7.15. Avoid unimproved pasture and semi-natural habitats including coastal heath, sand dunes and ancient woodland.~~
- ~~8.16. If siting in woodland, ensure some woodland is protected and a management strategy is in place to maintain tree cover between units over time e.g. phased regeneration/replanting.~~
- ~~9.17. Site adjacent to modern development.~~

Mitigation and enhancement guidance

- ~~1.24. All landscape improvements should be in character with the LCA in which they are located. For instance, trees and high hedges are not appropriate in open landscapes with low hedge banks, or in open moorland.~~
- ~~2.25. Reduce density of static caravan development creating green space with native tree planting between caravans, especially where caravans or chalets 'stack up' slopes.~~
- ~~3.26. Avoid placing static caravans very close to boundaries so planting can help to buffer effects.~~
- ~~4.27. In principle, restrict static, touring caravans and other 'hard' units to the edge of fields, and tents to the edge of fields in prominent coastal locations.~~
- ~~5.28. Consider static unit layouts which are less rectilinear with curving access roads and spaces.~~
- ~~6.29. In more prominent locations/fields and those directly by the coast consider removing static units and using the space for amenity e.g. open space recreation, play, dog walking.~~
- ~~7.30. In more prominent locations/fields and those directly by the coast consider removing static units and using the space for lower impact units, preferably seasonal tents, yurts or safari tents.~~
- ~~8.31. Change colour of caravans to less obtrusive shades and tones, e.g. light green, to reduce visual impact. Avoid white roofs and variety of finishes and colours across sites unless well integrated by intervening planting.~~
- ~~9.32. Limit the extents of decks and associated timber railings and avoid wide decks on sloping ground to avoid unsightly areas beneath.~~
- ~~10.33. Consider native shrub planting to soften the hard appearance of decks.~~
- ~~11.34. Maintain or change lighting to downward facing and low level lighting to minimum areas where necessary.~~
- ~~12.35. Place solar panels in discreet locations, preferably at a low level, to avoid wide visibility.~~
- ~~13.36. Where possible, place small scale wind turbines so they are visually associated and integrated with the structure/s they are serving.~~

- ~~14.37. Enhance the appearance of site facilities e.g. to give a rural farm complex appearance, and mitigate effects with planting where appropriate.~~
- ~~15.38. Maintain, reinstate and enhance the field boundary pattern including traditional hedgebanks, hedgerows and trees to help filter or screen views to sites.~~
- ~~16.39. Increase native tree and shrub planting within sites to break up the development and mitigate visual impact.~~
- ~~17.40. Replace fences with native hedges or hedgebanks.~~
- ~~18.41. Replace conifer hedges with native hedges.~~
- ~~19.42. Replace conifers with deciduous native trees.~~
- ~~20.43. Conserve woodland planting in and adjacent to sites to maintain and enhance screening.~~
- ~~21.44. Improve the biodiversity within sites to enhance habitats and wildlife corridors e.g. semi-natural habitats, watercourses and field boundaries etc.~~
- ~~22.45. Improve site entrances to have a rural character, using rural detailing, materials and planting reflecting the vernacular, avoiding large or obtrusive signs, bright lighting, bright colours and over large areas of hard standing.~~
- ~~23.46. Improve pedestrian access out of sites to places of interest whilst using discreet and appropriate detailing of stiles and gates.~~

Appendix ~~C~~B Definition of a Caravan

Pembrokeshire Coast National Park Authority

Pembrokeshire Coast National Park Local Development Plan 2

Parking Standards

Draft Supplementary Planning Guidance

Consultation Approval Date: September 2020

Adoption Approval Date:

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

Introduction

1. The purpose of this Supplementary Planning Guidance (SPG) is to assist those making planning applications with details of parking requirements for new developments. The guidance is embedded within the context of sustainable development, the need to reduce car travel and prioritisation of more sustainable means of travel.
2. SPG documents do not form part of an adopted Local Development Plan but are intended to offer detailed guidance elaborating on the Plan. They assist developers, applicants and planning officers in discussions prior to the submission of planning applications and provide a context for the evaluation of planning applications by planning officers and Authority Members.
3. This draft SPG is subject to public consultation before it is considered by the National Park Authority and formally adopted.
4. This SPG has been prepared in accordance with national planning policy and national transport guidance, in particular taking account of:
 - Planning Policy Wales ([Edition 10; December 2018](#) [Edition 11 February 2021](#)): *Welsh Government*
 - Technical Advice Note 18 – Transport (2007): *Welsh Government*
 - Manual for Streets (2007): *Department for Transport and Welsh Government*
 - Manual for Streets 2 (2010): *Chartered Institution of Highways and Transportation*
5. The parking requirements set out in this SPG are based on the All Wales Parking Standards and adapted for the local National Park context. They are based on a series of zones, identified by the proximity to Centres and availability of car-free access to facilities and services. They set out the **maximum** parking requirements for types of development in each of the zones. Requirements for cycle parking, disabled parking and motorcycle parking are also included.
6. Policy 59 of Local Development Plan 2 (Sustainable Transport) sets out requirements to ensure appropriate transport, access and parking requirements for new developments.

Policy 59	Sustainable Transport (Strategy Policy) To ensure that opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by: <ol style="list-style-type: none">a) Permitting proposals that assist in delivering improved traffic and parking management;b) Permitting facilities to improve public transport by helping to link between travel modes or providing facilities for passengers;c) Ensuring new development is well designed by providing
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- d) appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate; and
- e) Not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (see Policy 60)

Setting the Context for Sustainable Development

7. A key element of sustainable development is its location and the ability to reach the facilities and services needed. Welsh Government requires us to give priority to walking and cycling for shorter journeys and using public transport rather than private motor vehicles wherever we can. For this reason, the majority of new development will be directed towards locations that reduce the need to travel by car. This also means giving full consideration to pedestrian and cycling infrastructure within developments.
8. In rural areas such as Pembrokeshire it is acknowledged that there is a greater reliance on cars to get about but even so, new development should be located as to minimise the need to travel by car. Looking ahead, as technology changes, we need to ensure that our homes and communities are able to adapt quickly and easily to cleaner fuels. In addition to creating a favourable environment for walking and cycling, we need to equip our homes, businesses and public areas to support the use of ultra-low emissions vehicles (ULEV). In line with Planning Policy Wales (Edition [10-11](#)), paragraphs [4.1.39–4.1.40](#) and [4.1.41](#), the National Park Authority will encourage the provision of ULEV charging points as part of new developments.

Figure 8_The Sustainable Transport Hierarchy for Planning



Source: [Figure 9 Planning Policy Wales \(Edition 10-11, December 2018–February 2021\)](#)

Pembrokeshire Coast National Park

Local Development Plan 2

Place Plan Toolkit

Developing Affordable Housing with a
Community Land Trust

Consultation: September 2020

Adoption: **Approval Date**

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

Pembrokeshire Coast National Park Authority

8. For ease of reference a summary for suitable exception sites for affordable housing from that exercise is attached at Appendix 3 Suitable Sites for Affordable Housing along with a link to the Register.
9. If a new site is proposed by the Community Land Trust (i.e. one that has not previously been identified), the National Park Authority will undertake an assessment of the site's suitability for development free of charge.
10. This assessment will consider the initial suitability of the site in terms of whether it lies within or adjoining (if proposed solely for affordable housing) a Local Development Plan 2 Centre and the size and scale of the site is in keeping with the character of the Centre. – a list of Centres and the Communities they lie in is provided in Appendix 2 Centres listed in Local Development Plan 2. A copy of the full assessment form is provided in Appendix 4 Site Assessment.
11. The Authority will use the same approach it used to provide the assessment of sites for Local Development Plan 2. The parameters below will help inform a site's suitability in more detail.

Bringing A Site Forward: Tips and Advice		
Land owner Intention Are they willing to release the land?	Landscape Impact Would development of the site conserve or enhance the character of the village / street scene / surrounding context? Mitigation?	Amenity Privacy, Light, Noise
Ecological Sensitivity Is the site <u>or species</u> protected or worthy of protection?	Flood Risk Will the development be vulnerable to, or increase the risk of flooding?	Sewerage Capacity Water Supply Can the sewerage system cope? Can water be supplied?
Access for people and traffic Can the road network cope with the amount and type of traffic? Motorist and pedestrian safety.	Historic Environment Impact upon any of the following present on the site or neighbouring: Listed Buildings, Conservation Areas, Scheduled Monuments.	Affordable Housing Need The proposal meets affordable housing need in the locality.

Section 2 – Detailed Site Appraisal

	Criterion	Commentary	Assessment Criteria
1	Is the site within or adjoining an existing Centre?		Within a Centre
			Adjoining edge of Centre
			Countryside
2	Is the site located on previously developed (brownfield) land, as defined by Planning Policy Wales (page 3837, Edition 4011)		Brownfield
			Part Brownfield/part Greenfield
			Greenfield
3	Would the development of the site result in the loss of the best and most versatile agricultural land?		No loss
			Grade 3a and above
			Grade 1 or 2
4	Is the site accessible from a public highway?		Yes
			Yes – with improvements
			No
5	Is the nearby highway network capable of accommodating the resulting traffic movements?		Yes
			Yes – with improvements
			No
6	Is public transport available?		Yes – more than 5 buses / trains per day
			Yes – fewer than 5 buses / trains per day
			No
7	Would the development of the site result in the loss of publicly accessible open space?		Would not result in a loss
			Would affect public access but could be mitigated
			Would result in a loss
8	Is the site within 100m of existing water, sewerage, electrical, gas and telecommunications systems?		Yes
			No
9	Is there a possible infrastructure capacity		No

Pembrokeshire Coast National Park Authority

Renewable Energy

Draft Supplementary Planning Guidance to the

Pembrokeshire Coast National Park Local

Development Plan 2

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This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

Glossary

AD – Anaerobic Digestion

AONB – Area of Outstanding Natural Beauty

BREEAM – Building Research Establishment Environmental Assessment Method

CAD – Centralised Anaerobic Digestion

CCHP – Combined cooling heat and power

CHP – Combined heat and power

CIL – Community Infrastructure Levy

CLG – Communities and Local Government

CSH – Code for Sustainable Homes

EIA – Environmental Impact Assessment

FIT – Feed In Tariff

GSHP – Ground Source Heat Pump

KWh – Kilowatt hours

LAPC – Local Air Pollution Control

LCA – Landscape Character Area

LDP – Local Development Plan

LPA – Local Planning Authority

LUC – Land Use Consultants

MIPPS – Ministerial Interim Planning Policy Statement

MW - Megawatt

MWh – Megawatt hours

NNR – National Nature Reserve

NPA – National Park Authority

NPS – National Policy Statement

[NRW – Natural Resources Wales](#)

PCNP – Pembrokeshire Coast National Park

PCNPA – Pembrokeshire Coast National Park Authority

PLANED - Pembrokeshire Local Action Network for Enterprise and Development

PPW – Planning Policy Wales

PV – Photovoltaics

ROC – Renewable Obligation Certificate

RHI – Renewables Heat Incentive

SAC – Special Area of Conservation

SDF – Sustainable Development Fund

SEA – Strategic Environmental Assessment

SHW – Solar Hot Water

SPA – Special Protection Area

SPG – Supplementary Planning Guidance

SSSI – Site of Special Scientific Interest

TAN – Technical Advice Note

[WG – Welsh Government](#)

Introduction

- 1.1 The purpose of the Supplementary Planning Guidance (SPG) is to provide guidance to support the positive implementation of the Pembrokeshire Coast National Park Local Development Plan [2](#), Policy 33.
- 1.2 ~~An earlier version of this~~ guidance ~~was~~ adopted [under Local Development Plan 1](#).
- 1.3 ~~The main changes to be found in this replacement guidance are:~~
 - ~~▪ Updating local and national policy and other guidance references.~~
 - ~~▪ Removing dated advice regarding the planning application process and other consenting processes.~~
 - ~~▪ Updates to guidance on wind turbine development within the Landscape Character Areas sheets.~~
 - ~~▪ A review of landscape sensitivities for wind turbines as a result of a LANDMAP update. This has resulted in updates to sensitivities in for Landscape Character Area 9 (Marloes) and 27 (Mynydd Preseli).~~
- 1.4 ~~As much of the guidance reflects that set out in Local Development Plan 1 this guidance will be used in the interim for development management purposes effective from the date of Local Development Plan 2 adoption with the exception of advice for the Marloes and Mynydd Preseli Landscape Character Areas in relation to wind turbine development. A report of consultations will be prepared for National Park Authority consideration before the guidance is finally adopted.~~

The Role of Renewable Energy

- 1.5 Renewable energy refers to energy flows that occur naturally and continuously in the environment, such as energy from the wind or sun. These sources are not depleted by being used.
- 1.6 The term renewable energy is commonly used to describe both 'renewable' energy and 'low carbon' technologies. Whilst 'renewable energy' technologies (such as wind and solar energy) do not create carbon emissions during energy generation, 'low- carbon' energy technologies (such as air source heat pumps) have associated carbon emissions (in this case from the use of electricity to drive the motor), albeit much lower than that associated with conventional energy generation. [It is recognised that heat pumps can produce zero carbon energy, for example, where electricity is supplied by a green energy provider.](#)
- 1.7 For the purpose of this [Supplementary Planning Guidance](#), the term 'renewable energy' will be used to refer to renewable and low-carbon energy technologies.
- 1.8 ~~Renewable energy offers an alternative to energy generation using fossil fuels. The environmental benefits of renewable energy primarily link to reducing carbon dioxide (CO2) emissions. Renewable energy generation is a~~

key part of the commitment to reducing reliance on fossil fuels, tackling the climate emergency and meeting the Welsh Government's targets to achieve decarbonisation.

- 1.9 In addition to powering and heating homes, buildings and businesses, renewable energy can bring social and economic benefits through job creation in the manufacturing, construction and maintenance industries. Renewable energy schemes can support rural diversification and educational opportunities, and community-owned renewable energy projects can provide incentives and ownership, as well as promoting self-sufficiency.
- 1.10 Careful consideration also needs to be given to likely adverse effects. Renewable energy schemes should minimise any environmental, social, resource and economic impacts through careful site selection, good design, construction and other measures that reflects local circumstances. These are 'material planning considerations' that will need to be addressed on a site-by-site basis. This is particularly important in National Parks, where renewable energy installations should not adversely affect their special qualities.

National Parks and special qualities

- 1.11 National Parks have been designated to conserve their natural beauty, wildlife and cultural heritage. It remains a central objective to maintain the integrity and quality of the landscape within National Parks. It follows that development proposals should not adversely affect the special qualities of the National Parks.

Valued and Resilient: The Welsh Government's Priorities for Areas of Outstanding Natural Beauty and National Parks July 2018

'4. Green energy and decarbonisation

Designated landscapes must **contribute to a sustainable low carbon economy for Wales**, for example, **through enabling the generation of renewable energy at an appropriate scale, water management and carbon sequestration.**

In order to conserve and enhance the outstanding quality of these landscapes, AONBs and National Parks are afforded special protections within the land use planning system compared with the rest of the countryside. This is right. However, it is also right for the Authorities and Partnerships to be challenged to assist Welsh Ministers to discharge the duty under the Environment (Wales) Act to ensure that in 2050 net emissions are at least 80% lower than the baseline set in legislation.

Through careful planning and management these landscapes can play a key role in meeting the challenges of adaptation and mitigation of climate change, achieving energy security whilst creating resilient communities and supporting the environment. **Communities should be supported to bring forward appropriate renewable energy schemes** which have the

[potential to reduce dependence on carbon based energy and be a source of revenue for the community.](#)

- 1.12 The special qualities are those characteristics and features of a National Park that individually or in combination contribute to making the National Park unique. The special qualities of Pembrokeshire Coast National Park are outlined in the Pembrokeshire Coast Landscape Character [Supplementary Planning Guidance](#) and in the Pembrokeshire Coast National Park Local Development Plan-[2](#) and are as follows:

The special qualities of Pembrokeshire Coast National Park

- Coastal splendour
- Diverse geology
- Diversity of landscape
- Distinctive settlement character
- Rich historic environment
- Cultural heritage
- Richness of habitats and biodiversity
- Islands
- Accessibility
- Space to breathe
- Remoteness, tranquillity and wildness
- The diversity of experiences and combination of individual qualities

- 1.13 The priorities for protecting these special qualities are outlined in Policy 8 of the Pembrokeshire Coast National Park Local Development Plan [2](#).

- 1.14 [The National Park Authority has prepared Guidance on Sustainable Design and Development.](#) This includes useful design guidance for renewable energy, to which developers and applicants should refer. This guidance is reflected in the technology-specific guidance that follows.

- 1.15 [The National Park Authority has also prepared Guidance on the Cumulative Impact of Turbines which will assist.](#)

[National Planning Policy context](#)

- 1.16 The key policy drivers for renewable and low carbon energy developments in Wales are as follows:

National policy

[Renewable Energy \(General\)](#)

- 1.17 Nationally Significant Infrastructure Projects: The Planning Act 2008 defines what a Nationally Significant Infrastructure project is. The 2008 Act process, as amended by the Localism Act 2011, involves an examination of major proposals relating to energy, transport, water waste and waste water. Under the 2008 Act an application is made for a Development Consent Order (DCO) to the Planning Inspectorate. The Authority's role in the Examination is that of a statutory consultee and it is under a duty to submit a 'Local Impact Report' to the Examining Authority. National Policy Statements (NPSs) are

produced by the UK Government and decisions on Nationally Significant Infrastructure Projects are taken within the context of these statements.

- 1.18 Developments of National Significance in Wales: The statutory basis for the Development of National Significance (“DNS”) process is provided in Part 5 of the Planning (Wales) Act 2015, which amends the Town and County Planning Act 1990 (“the Act”), and the Developments of National Significance (Procedure) (Wales) Order 2016 and subsequent Regulations.
Future Wales – The National Plan 2040 states that proposals for large-scale energy development are classed as ‘Developments of National Significance’ and are determined by Welsh Ministers. As set out in legislation applications for Developments of National Significance must be determined in accordance with Future Wales, which is the national development plan for Wales. Large-scale energy developments include all on-shore wind generation of 10 or more megawatts and other energy generation sites with generating power between 10 and 350 megawatts.
Add para number: Future Wales Policy 17 states that in Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale energy development in these areas. Applications for large-scale wind and solar will not be permitted in National Parks and AONBs. Policy 18 states that proposals outside of the Pre-Assessed Areas for wind developments and everywhere for all other technologies will be permitted subject to the proposal having no unacceptable adverse impact on the surrounding landscape (particularly on the setting of National Parks and AONBs).
- 1.19 A full list of the types of developments covered by this can be found in The Developments of National Significance (Wales) Regulations 2016.
- 1.20 A Local Impact Report is also required for these types of proposals.
- 1.21 This guidance will be used to consider both planning applications to this planning authority for renewable forms of energy and for preparing Local Impact Reports.
- 1.22 Planning Policy Wales (PPW) Edition 40-11 (20182021) sets out the land use planning policies of the Welsh Government. Chapter 4 of PPW Productive and Enterprising Places states as part of Welsh Government’s aim to promote sustainability through the planning system, “The benefits of renewable and low carbon energy, as part of the overall commitment to tackle climate change and increase energy security, is of paramount importance.” (PPW, para.5.7877, 20182021).
- 1.23 Planning Policy Wales section 5.9 Renewable and Low Carbon Energy states the planning system should be used to optimise renewable energy generation, optimise low carbon energy generation, ~~facilitate combined heat and power systems (and combined cooling, heat and power)~~ maximise the use of waste heat or other heat sources such as former mine workings and promote heat networks where feasible and recognise that the benefits of

renewable energy are part of the overall commitment to tackle climate change by reducing greenhouse gas emissions as well as increasing energy security. However, these objectives need to be viewed alongside obligations to protect designated areas, species and habitats as well as the historic environment; ensuring mitigation measures are used to offset potential detrimental effects on local communities the need to minimize impacts on local communities, the impact on the natural and historic environment and cumulative impacts, whilst ensuring the potential impact on economic viability is given full consideration and; encourage the optimisation of renewable and low carbon energy in new development to facilitate the move towards zero carbon buildings.

- 1.24 Technical Advice Note (TAN) 8: Planning for Renewable Energy (2005) Planning Policy Wales 11 paragraph 5.9.8 states that Local Planning Authorities should undertake an assessment of the potential of all renewable energy resources, renewable energy technologies, energy efficiency and conservation measures and include appropriate policies in local development plans must develop an evidence base to inform the development of renewable and low carbon energy policies. Planning authorities should identify the accessible and deliverable renewable energy resource potential for their area whilst taking into account the cumulative impact of renewable energy development and associated infrastructure. Pembrokeshire Coast National Park Authority has undertaken such an assessment and it is this assessment that forms the background to this guidance.
- 1.25 Policy 33 Renewable and Low Carbon Energy: Policy 33 of the Local Development Plan sets out the policy framework for considering renewable and low energy proposals in the National Park.
- 1.26 Permitted Development Rights: Planning permission is not required for certain types of renewable energy developments. This is because these types of development are identified as being 'permitted development', under the Town and Country Planning (General Permitted Development) Order 1995 (the "GPDO"), as introduced by the Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2012. These changes include minor alterations to homes and the installation of a wide range of micro-generation equipment. It is important to consider the wider implications of any permitted development proposals. Although in some circumstances development may not require planning permission, it may still have the potential to adversely impact upon the natural environment. In such instances it is the responsibility of the applicant to ensure no harm results from the development. It is recommended that prior to changes being made applicants seek advice from the National Park Authority or Natural Resources Wales (NRW) in case other (legal) consents are required, e.g. an abstraction licence. Permitted development rights are sometimes removed by Local Planning Authorities. This can happen where an Article 4 Direction is put in place. It can also arise where a condition is put on a planning permission which removes permitted development rights.

Small Scale Solar Installations

What Are Small scale Solar installations?

- 1.27 Solar technologies are concerned with capturing energy from the sun. The two most common types of technology, and those considered here are solar hot water (SHW); and solar photovoltaics (PV). There are also emerging systems that heat the air of the building utilising roof mounted collector plates. This section covers small-scale building mounted SHW and solar PV installations. Some are subject to 'permitted development rights'. ¹ Field-scale commercial solar installations (known as 'solar farms') are addressed in Section 3.
- 1.28 Solar hot water: Solar water heating is deployed primarily as a building-mounted or building-integrated technology serving the needs of the building with which it is associated. It involves collecting heat from the sun via highly heat-absorbent collectors. Two main types are common in the UK: flat plate collectors and evacuated tube collectors, the latter being more effective throughout the year but more expensive. In both types, radiation from the sun is collected by an absorber plate in the collector, and is transferred as heat to a liquid, which may be either water, or a special fluid employed to convey the energy to the hot water system using a heat exchanger. A typical solar hot water installation is shown in the image below.
- 1.29 Solar Photovoltaics (PV): Solar Photovoltaics (PV) produce electricity from the light of the sun. Solar PV can either be roof-mounted, building-integrated through the use of solar shingles, solar slates, solar glass laminates or stand alone² in modular form.

Solar hot water panel (evacuated tube system)



Credit: Centre for Sustainable Energy

¹ Where such rights apply, no specific application for planning permission is needed.

² which is not installed on a building.

Field-Scale Solar Photovoltaics (PV)

What Are Field-scale Solar Photovoltaics (PV)?

- 1.35 Solar technologies are concerned with capturing energy from the sun. This section covers field-scale solar PV installations. Small-scale solar PV and solar thermal installations are addressed in Section 2.
- 1.36 Field-scale solar PV has been popular with developers, however, following changes to the FiT scheme, field-scale solar PV is only eligible for limited funding.
- 1.37 Proposals for field-scale solar PV developments consist of groups of solar PV panels installed in 'arrays' of 18-20 panels with each PV panel typically able to generate 220 watts of electrical power.
- 1.38 Four sizes of field-scale solar PV developments have been identified as having the potential to be located within National Park (classified to reflect its landscape sensitivities). These are:

Size	Area
Large	> 5 ha.
Medium	3 ha. – 4.9
Small	1 ha. – 2.9 ha.
Very small	<1 ha.

- 1.39 The main features of field-scale solar PV installations include:
- **Panels are dark in colour as a result of their non-reflective coating** to maximise absorption of light. Panels may however, appear paler in colour dependent on light conditions and type of panel. Panel surrounds and electric cable coverings may also reflect more light. They have been likened to polytunnels, silage bales wrapped in black plastic, or standing water (i.e. reservoirs or lakes) when viewed from a distance. Panels may also be seen from behind (back of the panels) or from the side (down the rows of frames) which strongly influences how they are perceived.
 - **Panels are encased in an aluminium frame**, supported by aluminium or steel stands mounted and secured either on pre-moulded concrete block 'anchors', or foundations. Some developments contain panels that can be manually rotated and/or tilted several times a year to enable the arrays to track the sun. The technology does exist to allow for automatic tracking, although this is rarer.
 - **Panels are held at a fixed angle** between 20-40 degrees from the horizontal, facing south to maximise absorption of energy from the sun
 - **Arrays are sited in rows with intervening gaps** between them for access and to ensure that the individual panels are not in the shade of another panel. The actual arrangement of the arrays within the

landscape varies from scheme to scheme (i.e. regular layouts versus more varied and irregular, depending on the site situation). Generally though, the **layout of solar arrays is regular**.

- **The height of the racks of solar panels varies** depending on the panel manufacturer and installer, but they tend to be between 2-4m off the ground. The approved scheme at Rhos-y-Gilwen [Solar Park, Pembrokeshire](#) has panels that will stand 2.5 metres above ground level and will be supported on metal legs.



Credit: Land Use Consultants

Installed solar array near Berlin, Germany



Credit: Land Use Consultants

Close up view of free-standing solar array

- **Grazing by sheep or geese** is possible dependent on the height of the solar panels. This is a compatible form of land management, as it

ensures that growing vegetation does not affect the efficiency of the panels, and allows for traditional rural land management to continue.

- **Security fencing up to three metres in height** is generally proposed as part of field-scale solar PV developments for insurance purposes. This tends to be mesh fencing, often topped with razor wire.
- **Screen planting may be necessary** to ensure the solar panels and associated infrastructure are screened from view. This has to be at sufficient distance to avoid casting shade over the peripheral panels.

1.40 In addition to the main features listed above, other aspects of field-scale solar PV developments include:

- Temporary storage for plant, machinery and materials during construction.
- Inverters to convert the electricity from DC to AC – these may be housed within small new or existing buildings.
- Transformer / underground power cables to transfer the electricity to the National Grid.
- On-site power house or control room (usually a Portacabin with a concrete base). The size of the proposed control room for the approved Rhos-y-Gilwen solar farm was 10 x 8 metres.
- CCTV.

~~1.41 New access tracks are not a requirement because temporary matting can be used to bring the solar panels to site (i.e. if a site is not accessible by existing roads or tracks).~~

Technological potential within Pembrokeshire Coast National Park

1.42 Wales is an attractive location in the UK for this technology, due to its good levels of solar radiation, relative to the UK as a whole.

Choosing a suitable site within the National Park

1.43 In general, the favoured sites for field-scale solar PV installations are plateaux tops / flat land or gentle slopes with a southerly aspect to maximise efficiency. From a landscape impact and logistical point of view, steep slopes should be avoided.

1.44 The capacity of power lines running close to the site is also an important consideration. 11kV lines can support installation of a solar array with an output of 2 or 2.5 MW, while 33kV lines could support a solar array which generates up to 5MW or more. It is also important to check the proximity of the nearest electricity substation, to which the solar panels will be connected.

1.45 Another consideration for site selection is the proximity of the railway and road network—, public rights of way and residential areas. The provision of any reflective material used on the panels should not interfere with the line of sight of train drivers and road users (for public safety reasons). In addition, the potential for glare or reflection of light from the panels that may impact

upon signalling should be explored and eliminated. Similarly, the impact of the siting of solar panels, particularly in terms of their reflectivity, should be considered in relation to views from the sea and the impacts that may have on sea users (e.g. for fishing, tourism and other commercial activities), [views from public rights of way and from residential areas](#).

- 1.46 The cumulative effect of multiple schemes should be taken into account, particularly as they tend to cluster around grid connection points.
- 1.47 The need to protect the high quality coastal landscape of the Pembrokeshire Coast National Park, limits locations suitable for the installation of field-scale solar PV developments. In March 2011, an assessment of landscape sensitivity to field-scale solar PV was completed on behalf of Pembrokeshire Coast National Park Authority. This used the Landscape Character Assessment of Pembrokeshire Coast National Park as a base. This divides the landscape of the National Park into 28 unique Landscape Character Areas (LCAs) each with its own distinct landscape character. The sensitivity of each Landscape Character Area to different scales of solar PV installation is indicated in Figure 3.1 – 3.4 while Annex 1 provides a commentary on these sensitivities and guidance on where and how solar PV developments can be accommodated within the National Park.
- 1.48 To use this information, identify the location of interest and relevant LCA using Figure 3.1 – 3.4 and review the sensitivity description and guidance provided in Annex 1 where separate information is provided for each LCA.

Key landscape sensitivities and general guidance for siting field-scale solar installations within the National Park

- 1.49 Field-scale solar PV installations can occupy substantial areas of ground which may be visible (particularly where sites are able to be viewed from adjacent higher ground). Key landscape effects of field-scale solar PV developments are that they may:
 - Be highly visible in open landscapes and on the upper slopes of hillsides, especially where covering significant areas.
 - Lead to a perceived increase in human influence on the landscape.
 - Result in a change in land use and in the appearance of a field or fields, affecting land cover patterns.
 - Introduce a regular edge (to the panels) that can be particularly conspicuous in more irregular landscapes (especially where the panels do not follow contours).
 - 'Overtop' hedgerows where panel heights rise to 3-4m, potentially reducing the visual prominence of field boundaries – this will be a particular issue where a number of adjacent small fields are developed.
 - Change the character of enclosure with security fencing and screen planting (including hedges allowed to grow out) around solar PV developments.
 - Damage landscape features during construction.

- Result in a significant change in the character of wild or natural landscapes which are valued for their high nature conservation value and qualities of remoteness.
- Introduce ancillary buildings that can be uncharacteristic in more wild and open landscapes.
- Result in glint and glare from the panels.

1.50 Annex 1 provides guidance on the location and siting of field-scale photovoltaic developments. A checklist of the main factors to be taken into account in the siting of field-scale photovoltaics is provided below:

- Locate any development back from the coastal edge so that it does not detract from the relative remoteness, drama and natural character of the coastline, maintaining its open and exposed character.
- Consider views along and to the coast, from local viewpoints, and from popular tourist and scenic routes (including The Pembrokeshire Coast Path and other rights of way). Avoid locating solar PV developments where they could be directly overlooked at close quarters from important or sensitive viewpoints.
- Maintain uninterrupted views from the coast to the internal landscape to preserve its remote and strong cultural and historic sense of place.
- Site solar PV development on flat landforms or on lower slopes/within folds in gently undulating lowland landscapes rather than on prominent upland landforms, highly visible slopes, or coastal headlands.
- Ensure PV developments do not span across different landscape types, such as across upland-lowland transitions.
- Site PV developments in landscapes where screening is already provided by woodland, hedgebanks or high hedges. Where new screen planting is required the National Park Authority should be consulted on the appropriate choice of species.
- Avoid siting PV developments across multiple fields in areas with a small scale irregular field pattern that is important to landscape character.
- Site PV development in areas that already contain signs of human activity and development rather than in landscapes with a high degree of perceived naturalness or remoteness.
- Consider how panels will be transported to site – some rural lanes are very narrow and have hedges either side. Small vehicles suitable for these narrow lanes should be used to ensure these features are not damaged.
- Suitable materials (such as cladding of buildings) and finish colours should be used that integrate any new buildings with their surroundings. Utilise existing farm buildings to house inverters wherever possible.
- Avoid adversely affecting areas of semi-natural habitat, and designated historic and archaeological sites directly or indirectly.
- Protect the character and setting of buildings within Conservation Areas.

- Ensure that any PV developments do not detract from prominent landmarks.
- Protect the special qualities of the Pembrokeshire Coast National Park (see Policy 8).
- Measures should be taken to minimise any visual and noise impacts on the amenity of neighbouring land uses.

Anaerobic Digestion

What is anaerobic digestion?

- 1.51 Anaerobic digestion (AD) is a method of waste treatment that can either produce a biogas with high methane content or, following a similar process, produces hydrogen, both from organic materials such as organic agricultural, household and industrial wastes and sewage sludge (feedstocks). The methane or hydrogen can be used to produce heat, electricity, or a combination of the two. Alternatively hydrogen can be used for storage of energy in hydrogen cells or as a medium for transporting energy for use elsewhere.
- 1.52 Anaerobic digesters utilising farm and food wastes bring considerable benefits. They convert methane, a significant greenhouse gas and a major by-product of animal slurries from livestock farming and anaerobic decomposition of food waste, into energy (electricity and heat). They make a significant contribution to reducing greenhouse gas emissions, both by reducing the quantities of methane released into the atmosphere, and by providing a low carbon energy source that substitutes for energy generated from fossil fuels.
- 1.53 An AD plant typically consists of a digester tank, buildings to house ancillary equipment, a biogas storage tank and a flare stack (3 – 10m in height). The digester tank is usually cylindrical or egg-shaped, its size being determined by the projected volume and nature of the waste. It can be part buried in the ground.
- 1.54 There are two scales of anaerobic digestion plant of relevance to Pembrokeshire Coast National Park:
- Small scale plants dealing with the waste from a single farm (generating in the region of 10kW) with the biogas potentially used to heat the farmhouse and other farm buildings in the winter when farm wastes are available.
 - A medium-sized centralised facility (CAD) dealing with wastes from several farms supplemented by other feedstocks and potentially producing up to 2MW.
- 1.55 The potential sourcing of feedstock for anaerobic plants within the National Park includes:
- **Farm wastes:** the National Park is a major livestock producing area with a large number of small dairy farms producing significant quantities of farm slurries that are an ideal feedstock. In addition, the resultant digestate from AD is a good and stable fertiliser that does not have the environmental problems associated with farm slurries which may be easily washed into water courses.
 - **Agricultural crops:** Where farm wastes are used in anaerobic digestion these are often supplemented during the summer by farm crops grown for that purpose.

- **Food processing wastes:** Food wastes produced within the National Park are a possible source.
- **Alternative plant materials:** Other sources of vegetation that have been considered as a feedstock for anaerobic digestion include waste vegetation arising from land management activities.

Technological potential within Pembrokeshire Coast National Park

- 1.56 The potential for anaerobic digestion will depend on the availability of suitable feedstocks within the area.

Choosing a suitable site within the National Park

- 1.57 Small-scale AD plants and those dealing with wastes from one or two farms offer significant potential for the generation of electricity and heat within the National Park. Provided digesters are integrated into the existing farm complex, or building groups, and natural screening is provided where appropriate, small digesters can be incorporated into the wider landscape and should not conflict with the National Park Management Plan objectives. Larger digesters, shared between a number of farms, or located to provide heat and energy to groups of houses, will need to be considered in terms of traffic movements and the potential impacts on landscape and the built environment.
- 1.58 Large commercial AD plants are unlikely to be acceptable within the National Park, because of the scale of the development and the lorry / tractor movements required to supply the feedstock through the year. As highlighted in the South West Wales Regional Waste Plan [August 2008, Appendix J](#), national parks are automatically excluded from areas of search for [sub-regional waste management sites](#). [In addition, Policy 27 Local Waste Management Facilities provides for facilities which predominantly serve the National Park rather than a wider area.](#)

Key landscape sensitivities and general guidance for siting anaerobic digestion plants within the National Park

- 1.59 Areas of the National Park where AD development of any scale should be avoided are:
- Tranquil, rural areas where human influence is limited.
 - The coastal edge.
 - All areas of semi-natural habitat.
 - Areas with a strong historic character.
- 1.60 A checklist of the main factors to take into account in the siting of small or medium-scale anaerobic digestion plants is provided below:
- They should be integrated or adjacent to existing buildings or farmsteads.
 - The digester tank should be part buried in the ground.

- Installations should not be sited in prominent locations or on exposed skylines – the flare stack can be prominent.
- Installations should not be prominent in key views, particularly those along the coastline.
- Existing landmarks (for example church towers and spires) should remain prominent and installations should not detract from views to these landmarks.
- Installations should not affect the historical value of designated industrial features, historic monuments and archaeological sites and remains, or the ecological value of semi-natural habitats.
- Installations should not adversely affect the character and appearance of any building Conservation Areas and listed buildings.
- Suitable materials (such as cladding of buildings) and finish colours should be used that integrate structures with their surroundings.
- Tree planting (using native species) that helps filter views of the AD plant should be considered from key public vantage points. This may include tree planting at a distance from the anaerobic digestion plant.
- Measures should be taken to minimise any visual, odour and noise impacts on ~~local residents~~ the amenity of neighbouring land uses associated with the operation of the plant and delivery of feedstocks.

Biomass Plants

What are biomass Plants?

- 1.61 Biomass plants are concerned with producing heat from the burning of plant materials. The final output will either be heat or electricity. For electricity production the heat / steam is used to turn a turbine. There are currently three basic categories of biomass plant:
- **Plants designed primarily for the production of electricity.** These are generally the largest schemes, in the range 10 – 40 MW. Excess heat from the process is not utilised. These plants are major multi-million pound developments and are unlikely to be suitable within the National Park because of the scale of development and associated traffic movements. **They are therefore not considered further here.**
 - **Combined Heat and Power (CHP) plants** where the primary purpose is the generation of electricity but the excess heat is utilised, for instance, as industrial process heat or in a district heating scheme. The typical size range for combined heat and power is 5 to 30 MW thermal total energy output but smaller 'packaged' schemes of a few hundred kilowatts have been built in the UK.
 - **Plants designed for the production of heat.** These cover a wide range of applications from domestic wood burning stoves and biomass boilers to boilers of a scale suitable for district heating, commercial and community buildings and industrial process heat. Size can range from a few kilowatts to above 5 MW of thermal energy.
- 1.62 Small and medium-scale biomass heating systems (and combined heat and power systems) for commercial premises, tourism facilities/accommodation complexes, community facilities (schools, leisure centres, public buildings) and groups of dwellings are typified by the following:
- A boiler (and boiler house) and associated storage facilities. A small heat plant for a school might consist of a 4m x 4m boiler house with a fuel bunker of similar proportions, which may be part underground, with a lockable steel lid.
 - A chimney – for a small plant like the one described above, this will be 3m to 10m high, depending on plant design and surrounding buildings.
 - Sufficient space to manoeuvre a large lorry or tractor and trailer safely for fuel delivery.
- 1.63 Domestic systems, including wood-burning stoves and biomass boilers, comprise the following features / requirements:
- Woodburning stoves are the size of a typical room heater and may be fitted with a back boiler to provide water heating as well as room heat. These typically use sawn logs.

- Ensure installations do not affect the historical value of designated industrial features, historic monuments or archaeological sites and remains, or the ecological value of semi-natural habitats.
- Ensure installations do not adversely affect the character and appearance of building Conservation Areas or of listed buildings.
- Suitable materials (such as cladding of buildings) and finish colours should be used that integrate structures with their surroundings.
- Measures should be taken to minimise any visual, odour and noise impacts on ~~local residents~~ the amenity of neighbouring land uses associated with the operation of the plant and delivery of feedstocks.

2 Micro-Hydro

What is Micro-hydro?

- 2.1 Hydro power is the use of water flowing from a higher to a lower level to drive a turbine connected to an electrical generator, with the energy generated proportional to the volume of water and vertical drop or head.
- 2.2 Small-scale hydro power plants in the UK generally refer to sites generating up to a few hundred kilowatts where electricity is fed directly to the National Grid. Plants at the smaller end of this scale (typically below 100kW) are often referred to as micro-hydro and may include schemes providing power to a single home.
- 2.3 The majority of suitable locations are likely to be for 'run of river' schemes, where a proportion of a river's flow is taken from behind a low weir and returned to the same watercourse downstream after passing through the turbine. Appropriate locations for 'storage' schemes, where the whole river is dammed and flow released through turbines when power is required, are unlikely to exist. The key elements of a 'run of river' micro-hydro scheme are:
 - A source of water that will provide a reasonably constant supply. Sufficient depth of water is required at the point at which water is taken from the watercourse, and this is achieved by building a weir across the watercourse of sufficient height to fill the penstock or 'intake'.
 - A pipeline, often known as a 'penstock', to connect the intake to the turbine. A short open 'headrace' channel may be required between the intake and the pipeline.
 - A cover / small shed housing the turbine, generator and ancillary equipment – the 'turbine house'.
 - A 'tailrace' returning the water to the watercourse.
 - A link to the electricity network, or the user's premises.

Technological potential within Pembrokeshire Coast National Park

- 2.4 Hydro power is well developed in Wales where most sites with a potential greater than 1 MW have been exploited. Within the Pembrokeshire Coast National Park the realistic options will be micro-hydro 'run of river' with an installed capacity of less than 100kW and the restoration of traditional mills (both river mills and tidal mills).

River Basin Management Plans and Abstraction Licenses

- 2.5 Local Planning Authorities have a statutory duty to have regard to River Basin Management Plans in exercising their planning powers. For hydropower schemes, this means ensuring that the hydropower development will not compromise the ability to achieve:
 - The environmental objectives of the River Basin Management Plan;
 - Good ecological status / potential of the waterbody; and
 - No deterioration of water quality status.

- 2.6 For all hydro power schemes, [Natural Resources Wales](#) will need to be contacted to issue an abstraction license. In addition, an Impoundment Licence and Flood Defence Consent may also be required from [Natural Resources Wales](#).

Choosing a suitable site within the National Park

- 2.7 Micro-hydro schemes can be integrated into the landscape with appropriate siting and design, utilising landform and existing vegetation to help screen the new small turbine housing.
- 2.8 The sensitive restoration of old water mill sites or other structures (i.e. weirs, mill ponds, millraces or leats, sluice gates and tailrace outlets) will bring considerable conservation benefits over and above the generation of electricity.

Key landscape sensitivities and general guidance for siting micro hydro schemes within the National Park

- 2.9 The following checklist should be noted when siting micro hydro schemes within Pembrokeshire National Park.
- Hydro schemes sited in rivers lined with trees may be concealed more easily than those in open landscapes.
 - In areas of more open landscape, high standards of design will help to minimise visual impacts, including the use of local materials for weirs and built structures along with vegetation screening.
 - Burying pipelines and minimising hard surfacing and ‘formal’ planting can help to integrate more visible schemes into the rural landscape.
 - Mills that are Listed Buildings and/or located within a Conservation Area require sensitive restoration that respects the structure of the original building.
 - Measures should be taken to minimise any visual or noise impacts on the amenity of neighbouring land uses.

3 Ground and Air Source Heat Pumps

What are ground and air source heat pumps?

Ground source heat pumps

- 3.1 Ground source heat pump (GSHP) systems capture the energy stored in the ground surrounding (or even underneath) buildings or from water (rivers, canals, lakes or underground aquifers). Essentially, they use low grade thermal energy from the ground and a refrigeration cycle to deliver heat energy at higher temperatures, (typically 40-45°C) or low temperatures, using a reverse cycle, for cooling (typically 6-12°C).
- 3.2 GSHP systems collect or deliver heat using ground collectors (typically coils or loops of pipe laid in trenches in the ground or vertical boreholes), in which a heat exchange fluid circulates in a closed loop and transfers heat via a heat exchanger to or from the heat pump. The heat pump itself is a similar size to a large fridge and is situated inside the building. A typical GSHP comprises the following:
- A heat pump.
 - An earth collector loop (which may be laid in a trench or in boreholes).
 - An interior heating or cooling distribution system.
 - Boreholes or trenches – boreholes drilled to a depth of between 15 - 150 metres benefit from higher ground temperatures than trenches.
- 3.3 Once installed, there are no externally visible features associated with ground source heat pumps.

Air source heat pumps

- 3.4 An air source heat pump (ASHP) uses the air as a heat source for heating a building. They can be described as an air-conditioning unit running in reverse. Air source heat pumps are typically mounted on an external wall (sometimes under a window). Increasingly, manufacturers are producing internally-mounted air source heat pumps which only need louvers and/or roof vents for air supply/exhaust emissions (as in a conventional boiler). Air source heat pumps tend to be much easier and cheaper to install than ground source heat pumps (as they lack any need for external heat collector loops). Once installed, the only externally visible structure may be the 'air conditioning unit' associated with the heat pump facility, although, as noted above, internally mounted pumps are now increasingly available which have no external visual impact. Air source heat pumps, depending on the manufacturer, may be no louder than a central heating boiler.
- 3.5 For both technologies, temperatures generated will generally be cooler than that associated with conventional heating systems. They are therefore better at supporting under floor heating (in the case of GHSP) or ducted warm air (in the case of ASHPs). However, new product ranges are emerging that can be retrofitted to conventional household heating systems.

Technological potential within Pembrokeshire Coast National Park

- 3.6 There are opportunities to use ground and air source heat pumps throughout the National Park.

Choosing a suitable site within the National Park

- 3.7 Because of their minimal landscape impacts, all areas of the National Park could be considered for the installation of ground and air source heat pumps.

Key landscape sensitivities and general guidance for siting ground and air source heat pumps within the National Park

- 3.8 The following checklist should be considered when siting ground or air source heat pumps within Pembrokeshire Coast National Park:
- The underground pipework associated with ground source heat pumps can easily be covered with soft or hard surfaces and so the system will not be visible from outside the building.
 - During construction, the laying of pipes linked to ground source heat pumps should avoid disturbing ground which would be difficult to restore, such as unimproved grasslands, semi-natural habitats, tree roots and archaeological remains.
 - Pembrokeshire Coast National Park Authority may require an archaeological survey before construction of ground source heat pumps and advice will need to be sought from the Dyfed Archaeological Trust.
 - Air source heat pumps should be mounted on the least visible elevations, such as the rear or side elevation of the building if using an externally mounted unit. Internal units are appropriate anywhere within the National Park.
 - Measures should be taken to minimise any visual and noise impacts on the amenity of neighbouring land uses.

4 Wind Energy

What is wind energy?

- 4.1 Wind turbines are one of the best known and understood renewable technologies. Wind turbines use the wind's lift forces to rotate aerodynamic blades that turn a rotor creating a mechanical force that generates electricity. The amount of energy derived from a wind turbine depends on wind speed and the swept area of the blade (the greater the swept area, the more power the turbine will generate). Wind turbines are generally given planning permission for 25 years, although re-powering (providing a new generation of turbines) may take place after this period has elapsed.
- 4.2 Wind turbines can be deployed singly, in small clusters, (2 – 5 turbines) or in larger groups as wind farms (typically 5 or more turbines). In the Pembrokeshire Coast National Park, to conserve the National Park's special qualities, the only potential will be as single turbines or, in very specific cases, small clusters of 2 – 3 turbines.
- 4.3 In all cases wind turbines consist of:
- the tower
 - a hub
 - blades
 - a nacelle (which contains the generator and gear boxes); and
 - a transformer that can be housed either inside the nacelle or at the base of the tower.
- 4.4 The infrastructure requirements for large-scale turbines, in addition to the turbine itself, include:
- road access to the site (usually a bell mouth or equivalent off the main road but may include road widening of more minor roads to achieve access if turbines are large)
 - on-site tracks (for construction and on-going maintenance)
 - turbine foundations
 - one or more anemometer masts
 - electrical cabling and an electrical sub-station/control building plus connection to the grid.
 - temporary crane hardstanding areas
 - temporary construction compound
- 4.5 Wind energy developments are unique in relation to other tall structures in the landscape, in that they introduce a source of movement into the landscape. In most current designs the turbine blades turn around a horizontal axis (See image below) but in some designs, which have been deployed in and around the National Park, the blades turn around a vertical axis. Two-bladed turbines are also available.

1 Height to blade tip

2 Efficiency and energy output is increasing all the time and therefore these values are likely to increase

Technological potential within Pembrokeshire Coast National Park

- 4.7 On the whole, Pembrokeshire Coast National Park has a good wind energy resource compared to many other parts of the UK. For more details, refer to the Renewable Energy Assessment for Pembrokeshire Coast National Park. Currently the BWEA³ suggests that a large wind turbine requires an average wind speed of more than 7m/s to be viable. Small turbines may be viable with average wind speeds as low as 5m/s.

Choosing a suitable site within the National Park

- 4.8 The potential for wind energy development within the National Park is constrained by the need to conserve the special qualities of the National Park. However, there is some potential for single or, in more limited locations, small clusters of 2 -3 small turbines where carefully sited.
- 4.9 An assessment of landscape sensitivity to different sizes of wind turbine was completed in 2008⁴. This used the Landscape Character Assessment of Pembrokeshire Coast National Park as a base. This divides the landscape of the National Park into 28 unique Landscape Character Areas (LCAs) each with its own distinct landscape character. The sensitivity of each Landscape Character Area to each class of turbine height is indicated in Figures 9.1 - 9.3 while Annex 2 provides a commentary on these sensitivities and guidance on where and how wind turbine developments can be accommodated within the National Park. To use this information, identify the location of interest and relevant LCA using Figures 9.1 – 9.3 and review the sensitivity description and guidance provided in Annex 2 where separate information is provided for each LCA. [This Supplementary Planning Guidance has been updated to take account of where wind turbines have resulted in discernible change in landscape character as a result of the LANDMAP update by Natural Resources Wales in March 2015.](#)

Key landscape sensitivities and general guidance for siting wind energy schemes within the National Park

- 4.10 Figures 9.1 – 9.3, and Annex 2 summarise the key landscape sensitivities to wind energy installations within the National Park. A checklist of the main

³ British Wind Energy Association (BWEA) : Wind Power: A guide for farms and rural businesses (November 1994)

factors to take into account in the siting of wind energy developments is provided below:

- Locate any wind energy developments back from the coastal edge so that they do not detract from the relative remoteness, drama and natural character of the coastline.
- Locate any wind energy developments (other than those within the curtilage of a private dwelling or associated with a settlement) at least one field back from the coastal edge to maintain its open and exposed character.
- Locate any wind energy developments away from the most prominent rural skylines and consider the impact of associated access tracks and ancillary buildings.
- Consider views along the coast, from local viewpoints, popular tourist and scenic routes (including The Pembrokeshire Coast Path and rights of way network) when siting any wind energy developments in the landscape.
- Ensure wind farm sites do not span across different landscape types, such as across upland-lowland transitions.
- Utilise existing woodlands, rolling topography and overgrown hedges to integrate any infrastructure associated with any wind energy development into the landscape.
- Avoid affecting areas of semi-natural habitat, directly or indirectly.
- Protect designated historic and archaeological sites.
- Protect the character and setting of buildings within Conservation Areas.
- Ensure that any wind energy developments do not detract from prominent landmarks.
- Avoid siting turbines in the most tranquil areas.
- Consider how turbines will be transported to site – some rural lanes are very narrow and have hedges either side. Small vehicles suitable for these narrow lanes should be used to ensure these features are not damaged.
- Protect the Special Qualities of the Pembrokeshire Coast National Park as set out in the Pembrokeshire Coast National Park Local Development Plan [2](#).
- The National Park Authority should ensure that any wind turbine development located within the protected landscape does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park⁵.

⁵ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

The National Park Authority has also prepared detailed supplementary guidance on the cumulative impacts of wind turbines.

New Para:

Where proposed off-shore wind energy developments are intervisible with an area of sea or coast along with another terrestrial wind energy development and / or off-shore renewable energy development, the cumulative effects on regional or local seascape character area(s) should be identified depending on the scale of the development, taking into account the national seascape assessment⁶ and the sensitivity of seascape to off-shore wind farm development. This is considered in a linked series of reports available from the NRW website⁷. Local seascape character assessments are detailed in the National Park Authority's Supplementary Planning Guidance on Seascape Character.

⁶ National Seascape Assessment for Wales, NRW Evidence Report No 80, November 2015.

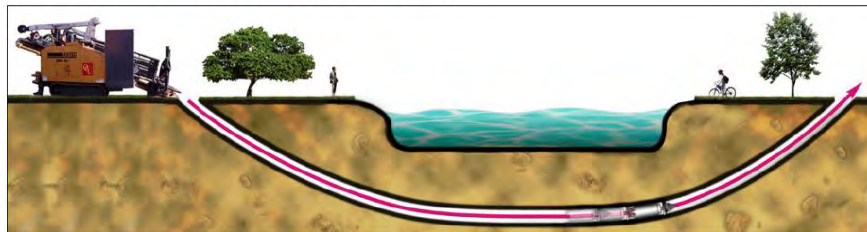
⁷ Seascape and visual sensitivity to offshore wind farms in Wales: Strategic assessment and guidance. Stages 1-3, NRW Evidence Report No 315, Natural Resources Wales, 2019.

On-shore Grid Connectors for Off-shore Wind and Tidal Energy Installations

What is an on-shore grid connector?

- 4.11 On-shore grid connectors provide a distribution transformer to which the off-shore generator (the wind turbines or tidal energy installations) can be connected via a cable, which is usually routed underground, but could be overhead—, or laid on the ground, e.g. over a cliff face.
- 4.12 The on-shore grid connection infrastructure consists of a grid connector (built structure), and cabling to link to the off-shore generator (the wind turbines or tidal energy installations). The cables will either take a route to the nearest road or a direct route to the nearest sub-station. In some cases, new sub-stations may be required. A single cable would typically be of the order 22-100mm in diameter, depending on the continuous current rating.
- 4.13 Cables are generally buried beneath the onshore material at a depth of around 1.5m deep. If the coastline includes cliffs, a hole is drilled from the cliff top down to the base of the cliff. The cables will be connected within an inspection chamber (approx. 2m concrete cube, buried underground) at the cliff base; the cables pass through the rock and into a second chamber, placed at the top of the cliff, buried but with an inspection hatch exposed. The cable runs are buried in trenches at around 1.5m depth – width depends on the size and number of cables (e.g. a large offshore windfarm will require a trench width of over 2m).

Simplified illustration of directional drilling to cross a surface feature



Annex 1: Landscape sensitivity and guidance for field scale solar PV development by LCA

This Annex provides a summary of landscape sensitivity to field scale solar PV development for each landscape character area (LCA) within the Pembrokeshire Coast National Park. LCAs 2, 17 and 23 are excluded as the assessment has focussed on predominantly rural LCAs.

The sensitivity of each Landscape Character Area to different scales of solar PV installation is indicated in **Figure 3.1 – 4**.

To use this information, identify the location of interest - see the attached **Map** showing the Landscape Character Area and relevant LCA using **Figure 3.1 – 3.4** and review the sensitivity description and guidance provided in **Annex 1** where separate information is provided for each LCA.

Landscape sensitivity levels and definitions

Sensitivity Level	Definition
High	Key characteristics of the landscape would be adversely affected by the renewable energy development. Such development would result in a significant change in character. Likely to be unsuitable for the renewable energy development.
Moderate-high	Many of the key characteristics of the landscape would be adversely affected by the renewable energy development. Such development would result in a noticeable change in character. There may be some limited opportunity to accommodate the renewable energy development without changing landscape character. Great care would be needed in locating infrastructure.
Moderate	Some of the key characteristics of the landscape are vulnerable and may be adversely affected by the renewable energy development. Although the landscape may have some ability to absorb some development, it is likely to cause some change in character. Care would be needed in locating infrastructure.
Low-moderate	Few key characteristics of the landscape would be adversely affected by the renewable energy development. The landscape is likely to be able to accommodate development without only minor change in character.

LCA 5: Stackpole

Landscape attribute	Sensitivity				
Overview	Although the enclosed nature of the landscape could indicate reduced sensitivity to solar PV development, the intimate scale of the river valleys, dense semi-natural woodland landcover, nationally important cultural and historic designed landscape and outstanding ecological importance of its diverse habitats all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
Key sensitivities	<ul style="list-style-type: none"> The enclosed, intimate scale of this valley landscape clad in long-established estate woodlands. The strong historic sense of place. Diverse habitats of international importance. The nationally important historical and archaeological value of the areas. The flooded coastal valley system with sand dunes and scenic beaches at Barafundle Bay and Broad Haven. 				
Guidance	<ul style="list-style-type: none"> This area is assessed as having a high sensitivity to any size and scale of solar PV development and therefore no guidance has been included. 				

LCA 18: St David's Headland

Landscape attribute	Sensitivity				
Overview	Although the rolling nature of this landscape could indicate reduced sensitivity to solar PV development, the irregular pattern of small-medium scale fields, considerable amounts of pasture, its open and exposed nature, valued semi-natural habitats and outstanding historic and cultural heritage all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
Key sensitivities	<ul style="list-style-type: none"> • Its open character particularly along the coast and on the headland. • Its predominantly pastoral land use with lack of woodland or other tall vegetation. • The presence of large tracts of semi-natural habitat including heathland, wetlands and rough grassland of international importance. • Pattern of irregular small-medium scale fields. • Extensive unspoilt views along the open coastline. • Outstanding historic and cultural value, including prehistoric features such as the Clegyr Boia Neolithic settlement and early Christian sites. • Strong associations with the cathedral city of St. David's 				
Guidance	<ul style="list-style-type: none"> • The pattern of irregular small-medium scale fields, lack of enclosure and large-swathes of internationally important semi-natural habitats means that the landscape is particularly sensitive to 'small', 'medium' and 'large' scale solar PV developments. • The natural and highly visible coastal edge is sensitive to all scales of PV development requiring that any PV developments are sited well back from the coast so that they do not detract from its remote and strong cultural sense of place. 				

LCA 20: Trefin

Landscape attribute	Sensitivity				
Overview	Although the undulating nature and scale of the landscape could indicate reduced sensitivity to solar PV development, the strong pattern of medium scale irregular fields, high percentage of pasture land, limited enclosure, presence of highly valued natural habitats, important historic features and sense of remoteness along the coast all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
Key sensitivities	<ul style="list-style-type: none"> • Its open and exposed character with few woodlands particularly along the coast. • The extensive views along the coast and the essential relationship of this landscape with its coastline. • The area's strong relative sense of remoteness, particularly along the coastal edge. • Its highly valued habitats of international importance, particularly along the coastal cliffs and the areas of lowland heathland. • The strong, irregular field pattern defined by hedgebanks and walls. • The nationally important archaeological sites, including prehistoric and early Christian monuments and remains relating to its industrial past, such as lime kilns. • The character and appearance of the Conservation Areas at Porthgain and Trefin. 				
Guidance	<ul style="list-style-type: none"> • -The presence of a strong pattern of irregular medium scale fields, limited enclosure and valued semi-natural habitats means that the landscape is particularly sensitive to 'medium' and 'large' scale PV developments. Small fields would also be sensitive to all but the smallest 'small' scale PV developments. 				

	<ul style="list-style-type: none"> • The natural and highly visible coastal edge and wooded inlets would be sensitive to all scales of solar PV development requiring that any PV developments are sited well back from the coastal edge so that they do not detract from its remote and strong cultural sense of place. • Avoid all scales of PV development in areas of very small fields. • More generally do not allow PV development to mask the field pattern with development across multiple fields • Use folds in the landform and small woodland clumps and scrub to screen PV development from public vantage points including rights of way, favouring flat landforms and lower slopes, while avoiding prominent landforms, highly visible slopes, or coastal headlands. • Avoid development in the more remote and tranquil parts of this LCA. • No development should occur on the open swathes of lowland heathlands and coastal cliffs of international importance. • Ensure that PV development does not affect the wealth of historical and archaeological features present, dating from prehistoric times to the recent industrial past, with the northernmost area of this LCA Pen Caer: Garn Fawr and Strumble Head Registered Landscape of Special Historic Interest in Wales. • Ensure that PV development does not affect the character and setting of the Trefin and Porthgain Conservation Areas, the latter recognising the large-scale industrial heritage of the area. • Protect views along the coastline from the Pembrokeshire Coast Path, other rights of way and public vantage points. Avoid locations where PV developments would be directly overlooked at close quarters by important/sensitive viewpoints.
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LCA 27: Mynydd Preseli

Landscape attribute	Sensitivity				
Overview	Although the large scale of the landscape could indicate reduced sensitivity to solar PV development the presence of very small irregular fields, extensive open moorland, improved pasture, slopes and higher summits providing panoramic views, the sparse nature of settlement, valued habitats and it's outstanding historical and cultural value all increase levels of sensitivity to solar PV development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large scale solar PV					
Medium scale solar PV					
Small scale solar PV					
Very small scale solar PV					
Key sensitivities	<ul style="list-style-type: none"> The open, exposed character of the moorland, with a strong sense of remoteness. Dominance of very small irregular fields surrounding the extensive open moorland. The pastoral character of the fringing agricultural land. The presence of valued upland habitats including acidic grassland and heathland grading into much wetter vegetation including boggy flushes, marshy grassland and wet heath. The presence of nationally valued prehistoric remains. The extensive views to the coast and the surrounding landscapes. The high visual prominence of the LCA – present in views from across northern Pembrokeshire. 				
Guidance	Because of the very high sensitivity of this area no guidance has been included.				

Annex 2: Landscape sensitivity and guidance for wind energy development by LCA

This Annex provides a summary of landscape sensitivity to wind energy development for each Landscape Character Area (LCA) within the Pembrokeshire Coast National Park. LCAs 2, 17 and 23 are excluded as the assessment has focussed on predominantly rural LCAs.

Landscape sensitivity levels and definitions

Sensitivity Level	Definition
High	Key characteristics of the landscape would be adversely affected by the renewable energy development. Such development would result in a significant change in character. Likely to be unsuitable for the renewable energy development.
Moderate-high	Many of the key characteristics of the landscape would be adversely affected by the renewable energy development. Such development would result in a noticeable change in character. There may be some limited opportunity to accommodate the renewable energy development without changing landscape character. Great care would be needed in locating infrastructure.
Moderate	Some of the key characteristics of the landscape are vulnerable and may be adversely affected by the renewable energy development. Although the landscape may have some ability to absorb some development, it is likely to cause some change in character. Care would be needed in locating infrastructure.
Low-moderate	Few key characteristics of the landscape would be adversely affected by the renewable energy development. The landscape is likely to be able to accommodate development without only minor change in character.
Low	Key characteristics of the landscape are robust and would not be adversely affected by the renewable energy development. The landscape is likely to be able to accommodate development without a significant change in character.

The sizes of wind turbine that have been considered are:

Size	Height to blade tip
Large	65m – 125m
Medium	25m – 65m
Small	<25m

Where the assessments have made reference to 'small clusters' of wind turbines, these comprise groups of 2-3 turbines.

LCA1: Saundersfoot Settled Coast

Landscape attribute	Sensitivity				
Overview	The area is already densely settled, and this indicates that this is landscape already affected by human impact and could therefore, in theory, accommodate additional built elements. However, the prominent undeveloped skylines, relative sense of tranquillity away from urban areas, the area's rich archaeology, and open views along the coast <u>indicate that this landscape would be sensitive to wind turbine development mean that this landscape has an overall moderate-high sensitivity to the development of wind turbines.</u>				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that could be sensitive to any scale of wind turbine development are:</p> <ul style="list-style-type: none"> • The open views along the coast, particularly south towards Tenby. • The relative sense of tranquility away from the urban areas. • The prominent undeveloped skylines, especially as viewed from the coast. • High historical value of industrial features and remains. • The ecological value of the semi-natural habitats. • The historic value of the parkland / estate around Hean Castle and Coppet Hall. • The character and appearance of the Saundersfoot Conservation Area. 				
Guidance	<ul style="list-style-type: none"> • Locate any wind energy developments away from the most prominent rural skylines and consider the impact of tracks and ancillary buildings. There may be some opportunity for single or small clusters of small scale wind turbines within or on the edges of existing urban areas. • Utilise existing woodlands and the rolling topography to integrate any infrastructure associated with any turbine development into the landscape. • Ensure that development does not adversely affect the character and appearance of Saundersfoot's Conservation Area. 				

	<ul style="list-style-type: none"> • <u>Avoid the close juxtaposition of different small turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Consider the open views along the coast when siting any wind turbines. • Ensure the church spire, seen above Monkstone Point, remains the prominent landmark in the view southwards from Amroth towards Tenby and turbines do not compete or conflict with this landmark. • New development within Saundersfoot may provide opportunities for integrating renewable energy structures such as wind turbines. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park⁹.
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⁹ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA3: Caldey Island

Landscape attribute	Sensitivity				
Overview	This landscape's open aspect would provide great potential to harness wind energy. However, the high visibility of the island from the mainland, its strong sense of tranquillity, nationally significant archaeological and historic features, along with its high value for biodiversity (including sea bird colonies and cliff top habitats) mean it has an overall high-high sensitivity to wind turbine developments of any size or scale.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that make it unsuitable for wind technology development are:</p> <ul style="list-style-type: none"> • Its high visual prominence from the mainland (including the island's lighthouse) and its flat terrain. • The small scale character of the island's landscape. • Its tranquil and lightly settled character. • Nationally important archaeological and historic remains, including the island's medieval priory and the potential of the inter-tidal zone. • The Conservation Area status of the eastern part of the island. • Important coastal habitats and species, including sea bird colonies on the cliffs. 				
Guidance	This area is assessed as having a high sensitivity to any size and scale of wind turbine development, therefore no guidance has been included.				

LCA4: Manorbier / Freshwater East

Landscape attribute	Sensitivity				
Overview	Although this LCA contains some development impacting on its otherwise open feel, the presence of an enclosed small-medium scale traditional agricultural landscape, internationally important habitats, and a strong historic sense of place means that it would have an overall moderate-high sensitivity to the development of wind turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that make it sensitive to wind turbine development are:</p> <ul style="list-style-type: none"> • Its traditional enclosed farmland character with a strong historic sense of place. • The open skyline with views across the coast and beyond to Caldey Island. • Presence of internationally important habitats and bird species (e.g. peregrine falcon, chough). • Wealth of historic and archaeological sites including the preserved manorial landscape of Manorbier (a landscape of outstanding historic importance) • Two Conservation Areas at Manorbier and Portclew. 				
Guidance	<ul style="list-style-type: none"> • This LCA is unsuitable for large scale turbines. • Single or small clusters of small scale turbines are likely to be most appropriate in this relatively small scale, rolling traditional farmed landscape. There may be opportunity for the single or small clusters of medium-scale turbines where sensitively sited, particularly inland. • Link any development to existing points of focus in the landscape, such as building clusters or industrial sites. • Consider the visual impact of tracks and ancillary buildings. There may be some opportunity for small scale wind turbines (below 25 metres) within or on the edges of existing or new urban development. • Utilise existing woodlands, the rolling topography and overgrown hedges to integrate any infrastructure associated with any turbine development into the landscape. 				

	<ul style="list-style-type: none"> • <u>Avoid the close juxtaposition of different small turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Site turbines away from the coastal edge so that they do not intrude into coastal views, particularly to Caldey Island and the coastal cliffs to the east. Consider views to the Preselis when siting any turbine development. • Protect the internationally important ecology by locating turbines away from sites of interest. • Protect historic and archaeological sites including the preserved manorial landscape of Manorbier (a landscape of outstanding historic importance). • Protect the character and setting of the Conservation Areas at Manorbier and Portclew. • Ensure that any turbine developments do not detract from the prominent landmarks at Manorbier; its castle, church and dovecote. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹⁰.
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¹⁰ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA5: Stackpole

Landscape attribute	Sensitivity				
Overview	This LCA's nationally important cultural and historic designed landscape, its enclosed and confined character, the outstanding ecological importance of its diverse habitats, its lack of built forms and the presence of important buried archaeology, make it highly sensitive to wind turbine developments. It is therefore assessed as having an overall high sensitivity to this form of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that make it sensitive to wind turbine development are:</p> <ul style="list-style-type: none"> • The strong historic sense of place. • The tranquil nature of the area. • Enclosed, intimate valley landscape • Diverse habitats of international importance. • The nationally important historic and archaeological features. • Scenic beaches with strong cultural presence. • The presence of breeding sea bird colonies on the cliffs. 				
Guidance	<ul style="list-style-type: none"> • This LCA is unsuitable for large and medium scale turbines. • Single small scale turbines are likely to be most appropriate in this enclosed and intimate landscape. • Link any development to existing points of focus in the landscape, such as building clusters. • Utilise existing woodlands and the steep valley sides to integrate any infrastructure associated with any turbine development into the landscape. • Protect the strong historic character of the Stackpole Estate and ensure the location of any turbines does not detract from this. • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Site turbines away from the coastal edge and outside of views to and from the beaches at Broad Haven and Barafundle Bay. 				

LCA6: Castlemartin / Merrion Ranges

Landscape attribute	Sensitivity				
Overview	The large scale of the landscape, the presence of military structures on the skyline, and the intrusive sound of gunfire in an otherwise tranquil landscape could indicate that this landscape might be able to accommodate additional man-made structures such as wind turbines. However, its open and wild landscape character, sense of relative remoteness, unsettled nature, long views along the coast, strong archaeological interest and the presence of important habitats supporting a range of wildlife species all pose constraints to the development of turbines and their associated infrastructure.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that could be sensitive to wind turbine development of any scale are:</p> <ul style="list-style-type: none"> • Its wild landscape character, with a sense of relative remoteness. • Its open and exposed character with long views across the coast. • Its largely undeveloped character. • The ridgetop skyline of prominent lines of church towers and spires. • The presence of nationally important historic and archaeological sites. • Valued coastal habitats and species, including coastal grassland and heathland. 				
Guidance	<ul style="list-style-type: none"> • The majority of this LCA is unsuitable for large or medium scale turbines. There may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys <u>(on the north-western edge of the LCA)</u> to provide a new point of focus as long as they are sited sensitively following the guidance below. • Elsewhere, this landscape is most suitable for single or small clusters of small scale turbines. 				

	<ul style="list-style-type: none"> • Site turbines well away from the coastal edge to conserve the open views along the coast and the naturalistic character of the coastal edge. • <u>Small scale turbines that are visually associated with existing built development (e.g. adjacent to buildings) and rationed within the landscape rather than concentrated in one particular area, will be most suited to this landscape.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Turbines would be most appropriately sited alongside existing built development (e.g. adjacent to buildings). • Ensure turbines do not compete with the church towers and spires as landmarks on the skyline. • Protect the internationally important coastal ecology, including semi-natural habitats and breeding bird sites and feeding areas. • Protect historic and archaeological sites from infrastructure associated with turbines. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹².
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¹² 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA 7: Angle Peninsula

Landscape attribute	Sensitivity				
Overview	The small scale field patterns, open undeveloped skylines, important coastal views, strong historic sense of place and the presence of important archaeological features and wildlife habitats all pose constraints to the development of turbines and their associated infrastructure.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that could be sensitive to wind turbine development of any scale are:</p> <ul style="list-style-type: none"> • Its exposed and undeveloped skyline, with sensitive coastal views, including to St Ann's Head. • The small scale of the landscape with a strong sense of tranquillity. • The outstanding historical and cultural value including presence of nationally important historic and archaeological sites, including the Milford Haven Waterway and Angle Conservation Area. • Valued estuarine habitats and species, including overwintering wildfowl and waders. 				
Guidance	<ul style="list-style-type: none"> • The majority of this LCA is unsuitable for large or medium scale turbines. There may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys <u>(on the eastern edge of the LCA)</u> to provide a new point of focus as long as they are sited sensitively following the guidance below. • There may be limited opportunity for single small scale turbines only on land close to the existing developed areas and built features, as long as they are sited sensitively following the guidance below. • <u>Small scale turbines that are visually associated with existing developed areas and built features and rationed within the landscape rather than concentrated in one particular area, will be most suited to this landscape.</u> 				

	<ul style="list-style-type: none"> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Site turbines away from the undeveloped coastal edge to protect coastal views, including to St Ann's Head. • Site well away from the planned Medieval village of Angle. • Ensure traditional agricultural field patterns with hedges and hedgebanks are not affected. • Protect valued habitats and species, including Angle Bay for its overwintering bird species. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹³. • <u>Identify and take account of possible cross-boundary cumulative impacts associated with turbines outside the National Park.</u>
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¹³ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA8: Freshwater West / Brownslade Burrows

Landscape attribute	Sensitivity				
Overview	This LCA's remote and undeveloped character, and the presence of a rare dune system and nationally important wildlife habitats, indicates that this LCA has a high-high sensitivity to any scale of wind turbine.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The landscape attributes that will be sensitive to turbine development of any scale are:</p> <ul style="list-style-type: none"> • Its remote and undeveloped character. • Rare dune system. • Diverse semi-natural habitats supporting a range of important plant and animal species. • Historic and archaeological sites, including Iron Age hillforts. 				
Guidance	This area is assessed as having a high sensitivity to any size and scale of wind turbine development, therefore no guidance has been included.				

LCA 9: Marloes

Landscape attribute	Sensitivity				
Overview	<p>Although this LCA already contains some existing small-scale turbines, the sparse settlement, predominantly rural character, inter-visibility with off-shore islands, undeveloped skylines and strong cultural heritage and valued wildlife habitats indicate that this landscape would be sensitive to wind turbine development, mean that this landscape has an overall moderate-high sensitivity to the development of wind turbines.</p>				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are sensitive to turbine development are:</p> <ul style="list-style-type: none"> • Its strong sense of rural tranquillity and undeveloped skylines. • Coastal views, including to and from Skomer and Stockholm islands. • Strong sense of tranquillity and relative remoteness, particularly at St Ann's Head. • Lighthouses that form landmarks on an otherwise open skyline. • Heathland and shoreline habitats of international importance supporting species such as peregrine falcon and grey seal. • Important historic features and cultural landscapes, including prehistoric sites and the Milford Haven Waterway. 				
Guidance	<ul style="list-style-type: none"> • This LCA is unsuitable for large or medium-scale turbines. • <u>There may be opportunity for single small scale turbines close to existing built elements (such as farm buildings). There may also be limited opportunities for single medium-scale turbines so long as they are sensitively sited. The guidance below must be adhered to.</u> • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> 				

LCA 10: Skomer and Skokholm

Landscape attribute	Sensitivity				
Overview	The islands' open aspect would provide great potential to harness wind energy. However, their high visibility from the mainland, open skylines, defining wilderness qualities, internationally significant archaeological and historic features, internationally important natural heritage and lack of human disturbance mean they have a high-high sensitivity to wind turbine developments of any size or scale.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that are sensitive to wind turbines are:</p> <ul style="list-style-type: none"> • Open and exposed character with panoramic sea views. • Strong wilderness qualities. • High visibility in views from most of the local mainland. • Absence of human disturbance. • Internationally important colonies of sea birds and natural habitats. • Internationally significant archaeological remains, including prehistoric agricultural and settlement features. • Constant relationship between the islands and the sea. 				
Guidance	This area is assessed as having a high sensitivity to any size and scale of wind turbine development, therefore no guidance has been included.				

LCA 11: Herbrandston

Landscape attribute	Sensitivity				
Overview	The dominating presence of industry on land in and immediately adjacent to this LCA indicates that it could accommodate additional man-made structures on the skyline. However, the landscape's peaceful, rural qualities, its lightly settled character, its outstanding historic and cultural heritage and valued estuarine habitats all increase sensitivity to the development of turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The landscape attributes that are sensitive to turbine development are:</p> <ul style="list-style-type: none"> • Its peaceful, agricultural character. • Valued estuarine habitats along Sandy Haven Pill and Milford Haven. • Important historic features and cultural landscapes, including structures associated with the Milford Haven Waterway Registered Landscape of Outstanding Historic Interest in Wales. • Views from St Ishmael's across Sandy Haven Pill and views across the Milford Haven Waterway. 				
Guidance	<ul style="list-style-type: none"> • This LCA is unsuitable for large scale turbines. • <u>There may, however, be limited opportunity for a single or a small cluster of medium or large (under 100m to blade tip) scale turbines on land close to existing oil refinery chimneys (on the eastern edge of the LCA) to provide a new point of focus as long as they are sited sensitively following the guidance below. There may be opportunities for single or small clusters of small-scale turbines sited within or adjacent to existing or new building clusters in the LCA.</u> • <u>Small scale turbines that are visually associated with existing or new building clusters and rationed within the landscape rather than concentrated in one particular area, will be most suited to this landscape.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Site turbines away from important estuarine habitats. 				

	<ul style="list-style-type: none"> • Ensure development does not adversely affect the setting of the nationally significant historical sites. Particularly consider how any development appears in views from and to Sandy Haven Pill, Great Castle and St Ann's Head (LCA 9) and across the Milford Haven Waterway towards the Angle Peninsula (LCA 7). • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹⁵. • <u>Identify and take account of possible cross-boundary cumulative impacts associated with turbines outside the National Park.</u>
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¹⁵ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA12: St Bride's Bay

Landscape attribute	Sensitivity				
Overview	Although this is a large scale landscape, the open skylines, the remote and undeveloped coastal edge, and presence of historical and archaeological features all pose constraints to development of wind turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The key landscape attributes that could be sensitive to wind turbine development of any scale are:</p> <ul style="list-style-type: none"> • The strong relationship between land and coast and the constant sight and sound of the sea. • The views across St. Brides Bay and along the undeveloped coastline. • The sense of remoteness/ tranquillity associated with the higher ground and the cobble beach at Newgale Sands. • Landscapes of high ecological value. 				
Guidance	<ul style="list-style-type: none"> • –This LCA is unsuitable for large or medium scale turbines. • There may be some limited opportunity for single or small clusters of small scale single turbines in areas of the rolling farmed landscape, associated with existing buildings, for example farm buildings. • <u>Small scale turbines that are visually associated with existing buildings or farms and rationed within the landscape rather than concentrated in one particular area, will be most suited to this landscape.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Avoid siting turbines on the undeveloped coastline within views across St. Brides Bay. • Avoid siting turbines in the most tranquil areas i.e. on the higher ground and the cobble beach of Newgale Sands. • Consider views to and from the Marloes coast, St David's headland and the off-shore islands. • Protect habitats of high ecological value. 				

	<ul style="list-style-type: none"> • Protect historical and archaeological features and the relationship with their surrounding landscape, including prehistoric sites and monuments. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹⁶. • <u>Identify and take account of possible cross-boundary cumulative impacts associated with turbines outside the National Park.</u>
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¹⁶ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA13: Brandy Brook

Landscape attribute	Sensitivity				
Overview	The presence of the main A487 cutting across the west of this LCA introduces a human form which could indicate the landscape could accommodate further man-made structures. In addition, the woodland and vegetation cover may indicate some structures could be hidden from view. However, its small scale, strong sense of peace and tranquility, strong visual relationship with Roch Castle, valued river habitats and species and archaeological remains all pose constraints to the development of wind turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The main landscape attributes that would be sensitive to wind turbine developments are:</p> <ul style="list-style-type: none"> • Its small scale, intimate character. • The relative sense of tranquility and peacefulness. • Strong visual relationship with Roch Castle as a prominent skyline feature. • Views to sea from hilltops. • Valued riparian habitats supporting species such as the otter. • Important prehistoric remains. 				
Guidance	<ul style="list-style-type: none"> • Large <u>or medium</u> scale turbines would not be appropriate in this landscape due to its small scale and tranquil character. • <u>Small scale turbines that are visually associated with existing groups of buildings and rationed within the landscape rather than concentrated in one particular area, will be most suited to this landscape.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Single small scale turbines are likely to be most appropriate where sensitively sited — e.g. near existing groups of buildings. • Ensure that Roch Castle remains the dominant skyline feature, making sure that the siting of turbines does not conflict with this local landmark. 				

	<ul style="list-style-type: none"> • Use the area's woodlands to provide screening against any turbines or related infrastructure. • Maintain coastal views to and from St David's Headland and St Bride's Bay. • Protect the area's valued semi-natural habitats and archaeological remains when considering the location of turbines and infrastructure. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹⁷. • <u>Identify and take account of possible cross-boundary cumulative impacts associated with turbines outside the National Park.</u>
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¹⁷ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA 14: Solva Valley

Landscape attribute	Sensitivity				
Overview	The area's industrial past, presence of built features/ buildings and high woodland cover indicate that this LCA could accommodate well sited man-made structures. However, its small scale, tranquil character, Solva's strong historic sense of place, the presence of an outstanding historic and archaeological heritage, and the presence of valued habitats and species all increase sensitivity to the development of wind turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are particularly sensitive to wind turbine development are:</p> <ul style="list-style-type: none"> • The small scale, intimate character of the valley landscape and its relative sense of tranquillity. • Solva's historic sense of place and special historic, cultural and architectural interest (as recognised by its Conservation Area status). • The strong link between the harbour at Solva and the coast. • Outstanding historic and archaeological features, particularly lime kilns by Solva harbour. • Internationally important heathland habitats along the valley floor supporting priority species such as the peregrine falcon and chough. 				
Guidance	<ul style="list-style-type: none"> • Large or medium scale turbines would not be appropriate in this landscape due to its small scale. • There may be limited opportunity for single small scale turbines as long as they are sensitively sited and take account of the guidance below. • Only site small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> 				

LCA 15: Dowrog & Tretio Commons

Landscape attribute	Sensitivity				
Overview	This landscape's large scale, presence of man-made features (airfield and main road) and lack of prominent skylines within the LCA indicate that this landscape may be able to accommodate well sited built features, such as wind turbines. However, its relative sense of tranquillity, inter-visibility with the Carn Llidi mountains and St David's, outstanding historic and cultural significance, and presence of highly valued semi-natural habitats all increase sensitivity to this form of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The main landscape attributes that would be sensitive to wind turbine developments are:</p> <ul style="list-style-type: none"> • Its open, undeveloped skylines and inter-visibility with the Carn Llidi mountains. • The strong rural and relative sense of tranquillity, particularly away from the main road through the LCA. • The large areas of unenclosed common land with internationally valued heathland habitats. • Outstanding historic and cultural interest, particularly the prehistoric sites and early Christian monuments, linking to the wider St David's Headland & Ramsey Island Registered Historic Landscape, and the Caerfarchell Conservation Area. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this open landscape due to it's<u>its</u> inter-visibility with surrounding areas. • There may be limited opportunity for single small scale turbines as long as they are sensitively sited and take account the guidance below. • <u>Only site single small scale turbines in areas where they can visually relate to existing buildings or built structures in the landscape. Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> 				

	<ul style="list-style-type: none"> • Consider views from the Carn Llidi mountains and St David's headland when siting small turbines • Protect areas of greatest tranquillity (there may be some opportunity to site small turbines close to the main road). • Ensure turbines and infrastructure do not affect the area's valued heathland habitats and commons. • Ensure that turbine development does not affect the character and setting of the Caerfarchell Conservation Area. • Ensure that turbine development does not affect the prehistoric significance of this landscape or the value of the St David's Headland & Ramsey Island Registered Historic Landscape. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park¹⁹.
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¹⁹ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA16: Carn Llidi

Landscape attribute	Sensitivity				
Overview	The distinctive open rocky skylines, strong feeling of remoteness with little human disturbance, and the wealth of outstanding archaeology and internationally important habitats all pose serious constraints to this type of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that make it unsuitable for wind turbines are:</p> <ul style="list-style-type: none"> • Its distinctive open, rocky skylines and inter-visibility with lower land including St David's and the Dowrog and Tretio Commons • Its strong sense of tranquillity and remoteness, with little human development. • Its nationally important archaeology, displaying thousands of years of use and settlement (recognised as part of the St. David's Headland and Ramsey Island Registered Landscape of Outstanding Historical Interest in Wales). • Its internationally important heathland and maritime habitats. 				
Guidance	This area is assessed as having a high sensitivity to any size and scale of wind turbine development, therefore no guidance has been included.				

LCA18: St David's Headland

Landscape attribute	Sensitivity				
Overview	This landscape's rural remote character, open and undeveloped skylines, extensive coastal views, wealth of outstanding archaeology and internationally important habitats all pose serious constraints to this type of renewable energy development. However, inland cultivated areas are a little less sensitive.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The main landscape attributes that would be sensitive to wind turbine developments are:</p> <ul style="list-style-type: none"> • Its peaceful, rural character with few built intrusions, particularly along the coast and on the headland. • Its open, undeveloped skylines, with St David's Cathedral a prominent local landmark. • The extensive unspoilt coastal views, including those to and from Ramsey Island. • Its outstanding historic and cultural value, including prehistoric features such as the Clegyr Boia Neolithic settlement and early Christian sites. • The presence of internationally important heathland, grassland and wetland habitats. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this open landscape. • There may be limited opportunity for single small scale turbines as long as they are sensitively sited and take account the guidance below. • Only site single small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape, well away from the coastal edge. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Maintain the open views along the coast and to Ramsey Island, Carn Llidi, St Bride's Bay and south to the Marloes 				

LCA20: Trefin

Landscape attribute	Sensitivity				
Overview	This landscape's large scale, open aspect, settled character, and past industrial activity may indicate that features such as wind turbines may be accommodated within the LCA if sensitively sited. However, its open undeveloped skylines, extensive coastal views, relative sense of remoteness on the coastal edge, highly valued coastal and heathland habitats, and presence of nationally important archaeological and historic sites all increase sensitivity to wind turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are particularly sensitive to wind turbines are:</p> <ul style="list-style-type: none"> • Its large scale, open aspect and undeveloped skylines. • The extensive views along the coast. • The area's strong relative sense of remoteness, particularly on the coastal edge. • The wealth of nationally important archaeological sites, particularly related to the area's industrial heritage such as lime kilns and the famous Blue Lagoon quarry. • The character of the Conservation Areas at Trefin and Porthgain. • Its highly valued habitats, particularly along the coastal cliffs and the areas of lowland heathland. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this landscape. • There may be limited opportunity for single or small clusters of small scale turbines as long as they are sensitively sited and take account the guidance below. • Only site small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> 				

LCA21: Pen Caer / Strumble Head

Landscape attribute	Sensitivity				
Overview	This landscape's open aspect would make it well suited for harnessing wind energy. However, its open, undeveloped skylines, extensive coastal views, strong sense of tranquillity and remoteness, valued habitats and species, and the presence of nationally important archaeological and historic sites all pose constraints to the development of turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are particularly sensitive to the development of wind turbines are:</p> <ul style="list-style-type: none"> • The undeveloped and characterful skylines of jagged coastal cliffs and rocky hill summits. • The landmarks of Strumble Head lighthouse and Iron Age hillfort at Garn Fawr . • The extensive views along the coast and intervisibility with the Preseli Hills. • The strong sense of tranquillity and remoteness, with sparse settlement and lack of intrusive development. • The presence of nationally important archaeological sites, including the prominent hill forts at Garn Fawr and Garn Fechen and early Christian sites. • Its valued habitats, particularly along the coastal cliffs and the open hill summits. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this landscape. • There may be limited opportunity for single small scale turbines as long as they are sensitively sited and take account the guidance below. • Only site small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape, preferably adjacent to existing farm buildings, and well away from the coastal edge. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> 				

	<ul style="list-style-type: none"> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Ensure turbines do not affect the undeveloped and characterful skylines of jagged coastal cliffs and rocky hill summits. • Consider views to and from the Preseli Mountains in the east when siting any turbines. • Ensure turbines do not conflict with views to important land mark features, namely the hillforts on Garn Fawr and Garn Fechen, and the lighthouse on Strumble Head. • Do not site turbines of any size on Strumble Head, or along the landscape's distinctive coastline. • Ensure turbines and related infrastructure do not affect the area's valued heathland and cliff-top habitats or the area's valued historic and archaeological features, particularly its prehistoric and early Christian sites and monuments. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park²².
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²² 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA22: Mynydd Carningli

Landscape attribute	Sensitivity				
Overview	This landscape's distinctive rocky and undeveloped skylines, strong sense of tranquillity and remoteness, internationally valued habitats, and nationally important archaeological and historic sites indicate that this LCA has a high-high sensitivity to any scale of wind turbine development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are particularly sensitive to the development of wind turbines are:</p> <ul style="list-style-type: none"> • Its undeveloped skylines with distinctive rock formations and Iron Age hillfort, which are dominant features when viewed from the surrounding landscape. • The intervisibility of the area with the coast and the Preseli Hills. • Its strong sense of tranquillity and remoteness and relative inaccessibility. • Its sparse settlement and lack of intrusive development. • The presence of nationally important archaeological sites, including the prominent hill forts at Garn Fawr and Garn Fechen and early Christian sites. • Its valued habitats (including open moorland and heathland), particularly along the coastal cliffs and the open hill summits. 				
Guidance	This area is assessed as having a high sensitivity to any size and scale of wind turbine development, therefore no guidance has been included.				

LCA24: Dinas Head

Landscape attribute	Sensitivity				
Overview	Although this landscape has a large scale landform and settled character, its relative sense of tranquility, open undeveloped skyline, coastal views and valued prehistoric archaeology all present sensitivities to this form of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are particularly sensitive to wind turbines are:</p> <ul style="list-style-type: none"> • The prominent headland of Dinas Head and the rocky coastline, visible in many views from within the LCA. • The relative sense of tranquillity away from the A487 road. • The scattered, traditional settlement pattern. • The distinctive views to, and inter-visibility with, Mynydd Carningli and the Preseli Hills. • Nationally valued prehistoric remains including Carrig Cerrig y Gof chambered tomb, as part of the Newport and Carningli Registered Landscape of Special Historic Interest. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this landscape. • There may be limited opportunity for single small scale turbines as long as they are sensitively sited and take account the guidance below. • Only site single small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape, including adjacent to existing farm buildings, and well away from the coastal edge. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Ensure turbines do not affect the characteristic undeveloped skylines of rocky coastal cliffs and the distinctive feature of Dinas Head. Do not site any turbines on Dinas Head. 				

	<ul style="list-style-type: none"> • Consider views to and from the Preseli Hills Mountains and Mynydd Carningli when siting any turbines. • Ensure turbines and related infrastructure does not affect the area's prehistoric remains within the Newport and Carningli Registered Landscape of Special Historic Interest, particularly Cerrig y Gof Neolithic tomb. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park²³. • <u>Identify and take account of possible cross-boundary cumulative impacts associated with turbines outside the National Park.</u>
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²³ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA25: Cemaes Head

Landscape attribute	Sensitivity				
Overview	Although this landscape has a large scale landform, its relative sense of tranquillity, open undeveloped skylines, coastal views and valued prehistoric archaeology all present sensitivities to this form of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The landscape attributes that would be particularly sensitive to the development of wind turbines are:</p> <ul style="list-style-type: none"> • The landscape's sparse settlement pattern, lack of visible development and strong sense of tranquillity. • Its open, undeveloped skylines including distinctive burial mounds and tumuli on the high outcrop of Crugiau Cemmaes. • The open and exposed coastal edge and important coastal views. • Inter-visibility with the adjacent Mynydd Carningli and Mynydd Preseli. • The presence of nationally valued prehistoric remains including burial mounds and tumuli on the high outcrop of Crugiau Cemmaes. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this landscape. • There may be limited opportunity for single or small clusters of small scale turbines as long as they are sensitively sited and take account the guidance below. • Only site small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape, e.g. adjacent to existing farm buildings, and well away from the coastal edge. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Take advantage of the screening effects of the area's woodlands and hedgerows when locating wind turbine infrastructure. 				

LCA26: Cwm Gwaun / Afon Nyfer

Landscape attribute	Sensitivity				
Overview	The small and intimate scale of the valleys, high levels of tranquillity, sparse settlement, and the presence of valued semi-natural habitats and historic sites all pose constraints to this form of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>Landscape attributes that are particularly sensitive to the development of wind turbines are:</p> <ul style="list-style-type: none"> • The small scale and intimate character of the valley landscapes. • The landscape's sparse settlement pattern, lack of recent development and sense of tranquillity. • Its wooded, undeveloped skylines and views to the adjacent uplands of Mynydd Carningli and Mynydd Preseli. • Valued woodland and meadow habitats, particularly in the Cwm Gwaun valley. • The landscape's nationally significant archaeology, including Iron Age hillforts and Neolithic tombs around Nevern. 				
Guidance	<ul style="list-style-type: none"> • Large or medium scale turbines would not be appropriate in this landscape. • There may be limited opportunity for single small scale turbines as long as they are sensitively sited and take account the guidance below. Only site small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape, preferably adjacent to existing buildings. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Take advantage of the screening effect of the area's woodlands and overgrown hedges when locating any infrastructure associated with small scale turbines. 				

LCA27: Mynydd Preseli

Landscape attribute	Sensitivity				
Overview	This landscape's conspicuous landform, undeveloped skylines, absence of settlement and built development, and nationally valued prehistoric remains all pose significant constraints to the development of wind turbines.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The landscape attributes that would be particularly sensitive to the development of wind turbines are:</p> <ul style="list-style-type: none"> • Its open moorland character with an overriding sense of tranquility and remoteness. • The lack of development and woodland cover. • The strong visual prominence of the hills in the wider landscape of northern Pembrokeshire. • The extensive views to the coast and across the surrounding landscapes. • Its nationally valued archaeological resource, particularly the breadth and range of prehistoric remains. 				
Guidance	<ul style="list-style-type: none"> • This landscape would be highly sensitive to the development of all sizes and scales of turbine. There may be very limited potential for single or small clusters of small scale turbines, providing the guidance below is followed. • Only site small scale turbines in areas where they can relate <u>visually</u> to existing buildings or built structures in the landscape, preferably adjacent to existing farm buildings. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Take advantage of the screening effects of the area's plantations when locating wind turbine infrastructure. • Ensure turbines do not affect the undeveloped skylines and views across the surrounding landscape towards the coast. • Do not site turbines in prominent positions which could be visible from surrounding areas. 				

	<ul style="list-style-type: none"> • Ensure turbines and related infrastructure does not affect the area's prehistoric remains within the Preseli Registered Landscape of Outstanding Historic Interest in Wales. • The National Park Authority should ensure that any wind turbine development located within this LCA does not sacrifice the essential integrity, coherence and character of the landscape or the special qualities of the National Park²⁶. • <u>Identify and take account of possible cross-boundary cumulative impacts associated with turbines outside the National Park.</u>
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²⁶ 'Integrity' refers to how the landscape reads as a whole, whilst 'coherence' relates to how the individual components of the landscape connect together. 'Character' relates to the combination of essential landscape elements which make one landscape distinctive from another.

LCA28: Daugleddau

Landscape attribute	Sensitivity				
Overview	Although there are signs of former industry (small scale mining industry and limestone quarrying), this landscape's sheltered and intimate rural character, undeveloped skylines, great sense of tranquility, characterful views across the river, and semi-natural habitats present sensitivities to this form of renewable energy development.				
	Low	Low-Moderate	Moderate	Moderate-High	High
Large turbines					
Medium turbines					
Small turbines					
Key sensitivities	<p>The landscape attributes that would be particularly sensitive to the development of wind turbines are:</p> <ul style="list-style-type: none"> • The landscape's lightly settled character and high levels of tranquility. • Its intimate and enclosed landscape character with strong historic sense of place. • Its undeveloped, wooded skylines. • The presence of historic features including Bronze Age barrows, Iron Age hillforts and parkland. • The presence of valued semi-natural habitats. 				
Guidance	<ul style="list-style-type: none"> • Large and medium scale turbines would not be appropriate in this landscape. • There may be limited opportunity for single or small clusters of small scale turbines as long as they are sensitively sited and take account the guidance below. • Only site small scale turbines in areas where they can <u>visually</u> relate to existing buildings or built structures in the landscape, preferably adjacent to existing farm buildings, and away from the estuary edges. • <u>Avoid the proliferation of separate small turbine schemes along the same ridgelines.</u> • <u>Avoid the close juxtaposition of different turbine designs and heights, aiming instead for a consistent height and design in any given area.</u> • Take advantage of the screening effect of the area's woodlands when locating wind turbine infrastructure. 				

Pembrokeshire Coast National Park Authority

Pembrokeshire Coast National Park Local Development Plan 2

Sustainable Design & Development

Future-proofing buildings in the Pembrokeshire Coast National Park – including residential and agricultural development



Draft Supplementary Planning Guidance

This item is also available in Welsh/ Mae'r eitem hon ar gael yn Gymraeg hefyd

Consultation: **September 2020**

Adoption: **Approval Date**

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Sustainability in the Pembrokeshire Coast National Park

Purpose of this guidance

4. The aim of this guidance is to promote high quality, sustainable design that enhances the natural beauty, wildlife and cultural heritage of the Pembrokeshire Coast National Park. The aim is to ensure that the design of developments includes high quality buildings and spaces, based on the principles of intelligent siting, climate-responsive structures, using sustainably sourced materials.

What types of developments need to be sustainable?

5. Basically we need to ensure all types of new developments and modifications to existing buildings are sustainable. In Pembrokeshire Coast National Park the focus tends to be on residential development, agricultural development, visitor attractions and accommodation, and commercial and business development.

~~Background—where has this guidance come from?~~

- ~~6. As at 5th January 2020, 25 countries have made national declarations of a climate emergency¹.~~
- ~~7. On 10 May 2019 Pembrokeshire County Council—which provides many public services within the National Park—also declared a climate emergency.²~~
- ~~8. The National Park Authority responds to climate change across its functions, for example via carbon reduction and sequestration, adaptation and mitigation. The Authority is also considering where it can take further action.~~
- ~~9. According to the Technology Strategy Board, the construction, operation and maintenance of the built environment accounts for 45% of total UK carbon emissions (27% from domestic buildings and 18% from non-domestic buildings).~~
- ~~10. The UK Green Building Council says that around 10% of the UK's carbon dioxide emissions are directly associated with construction. This includes the CO₂ generated through the entire building process.~~
11. It is therefore no surprise that the focus on buildings and the reduction of their impact on the environment—whilst being built and then when occupied—needs serious consideration. Time spent carefully designing prior to construction will be repaid with environmental, social and economic gains in the future.

¹Wikipedia Climate Emergency Declaration, 4th February 2020.

²Wales Newsonline Climate Emergency Declared by Pembrokeshire County Council May 10 2019

- ~~12. If this pattern of consumption were repeated on a global scale, we would require the resources equivalent to 3 of our worlds to support our existence. This level of consumption is unsustainable.³~~
- ~~13. Better design and construction techniques will assist with lowering harmful emissions, whilst also offering economic and social benefits through more sustainable supply systems, improved energy efficiency, aesthetic improvements to our future built heritage and enhanced community cohesion.~~
14. Design quality is not just how a structure looks, but how it functions and meets the social, economic and environmental needs of the people it serves. A well designed building will also allow for flexible use of its spaces to enable adaptations to be made to assist with it being used to its full potential and taking into account future needs.

Planning context – where does this guidance sit?

- ~~15. Since the previous Pembrokeshire Coast Local Development Plan and the original Supplementary Planning Guidance on Sustainable Design (adopted 22nd June 2011, technical update December 2013) and the separate Supplementary Planning Guidance on Siting and Design of Farm Buildings (adopted 13th June 2012), there has been a huge increase in the understanding and need to address the consequences of climate change. The Welsh Government has been at the forefront of attempting to make changes to planning to combat the negative effects that climate change is having on Wales, and Welsh Government's ambition is for Wales' public sector to be carbon-neutral by 2030. There is now substantial guidance in the form of Planning Policy Wales (PPW) 10 (please note in particular the national sustainable placemaking outcomes and section 5.8.3 of PPW10) and Technical Advice Note (TAN) 12 which demonstrate how the Welsh Government sees 'Planning' addressing the matter of sustainability. A further overview and direction (not just for planning purposes) comes from the Wellbeing of Future Generations Act (2015). The ways of working towards a more sustainable future with an ambition of being zero carbon is contained in the Commissioner's for Wellbeing of Future Generation's literature. These documents need to be read to understand the context of sustainability thinking for Wales.~~
16. This guidance has been produced to support in particular Policy 29 Sustainable Design and Policy 30 Amenity - Pembrokeshire Coast National Park Local Development Plan 2 in September 2020. It forms supplementary planning guidance to the Local Development Plan 2. It will be used by the Pembrokeshire Coast National Park Authority to assess whether planning applications comply with the policies of Local Development Plan 2.
17. A report of consultations detailing how this Supplementary Planning Guidance was consulted upon will be made available to view on the Authority's website when the guidance is adopted.

³ Quote from Building a Future for Wales, WWF & WSA 2005.

Definitions, planning policy

What is Sustainable Development?

18. “Sustainable Development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.
19. Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. (Planning Policy Wales [40-11](#) - Introduction)
20. ‘Good design is not inevitable. It requires a collaborative, creative, inclusive, process of problem solving and innovation - embracing sustainability, architecture, place making, public realm, landscape, and infrastructure.’ TAN 12, 2016.

Advantages of sustainable design and development

21. Achieving sustainable design cannot be an optional extra to development. High quality sustainable development is essential if long term damage to the environment of the National Park is to be minimised.
22. A scheme based on the principles of sustainable design will have the following advantages:
 - The running costs of a development will be much reduced.
 - Design approaches providing for sustainability and incorporating appropriate renewable energy should not add prohibitively to capital costs when valued over the life of the building.
 - The development will meet the needs of the local community through addressing local as well as global needs. An Energy Performance Certificate, which rates how efficient homes are on a scale of A-G, is required for all homes marketed for sale or to let in England and Wales.
 - As occupiers recognise the benefit of lower running costs the properties will become more marketable
 - The building will minimise its own and its occupiers’ impact on it’s surrounding – including visual, environmental, light and sound.
23. Many of the requirements of sustainable design can be addressed through sensible siting and passive design - measures which add little or nothing to the capital cost of a scheme. The provision of sources of renewable energy will add to the capital cost of a scheme, but in the longer term can be positively balanced against lower future energy costs and lower environmental impact.

Building a sustainable future

24. Traditional methods of construction in the National Park can be characterised by buildings which we appreciate for adding value to the landscape, being read as part of their setting and being distinct in the local area. Local building techniques using local resources were shared locally by builders, designers and occupiers through necessity. However, with the advent of cheap energy and the ability to access materials from anywhere, these skills are dwindling. This has resulted in the building design becoming homogenised - no distinction between areas and no difference in character. It is interesting to note that it is often the older, more traditionally-built settlements that remain favoured by us in terms of appreciation of aesthetics – creating locally distinct places.
25. This guidance promotes a thoughtful approach to the design of buildings in the National Park. The traditions of sensible siting and orientation which make the most of the local topography to maximise sunlight and minimise exposure should be at the forefront of design practice, as should the use of locally produced and sourced sustainable materials and energy sources.
26. New technologies give us the opportunity to explore radical design solutions and to a point the National Park Authority will embrace such ideas – so long as it can be demonstrated that the outcome will be a high quality addition which will enhance the National Park ethos. ~~Sustainable buildings and developments which are in unsustainable locations, i.e., remote and inaccessible are very rarely appropriate and will be resisted.~~

40. Heating costs can be reduced through good siting, design, adoption of ventilation principles and draught proofing. The following options should be considered as a means of improving a building's energy performance.

Passive design

41. This means designing with climate in mind so that a building can benefit from aspects such as solar gain (the ability of a structure to absorb the temperature from the sun), daylight and natural ventilation, whilst providing shelter and comfort inside and outside buildings. Designs must balance solar exposure with surface heat losses and internal gains. The daily and annual movement of the sun should be considered, as solar gain's benefits can vary depending on building use and times of building occupation.
42. The following issues should be addressed through the design process:-

Siting

43. Buildings and extensions should be sited to optimise 'free' aspects of climate [where this is compatible with other planning policy considerations including impacts on the environment etc.](#) These include useful solar gain, shading and sheltering, useful wind and ground conditions. Larger windows should face the south, and smaller windows to the north. Take care, however, to avoid unacceptable overlooking and light spillage.
44. Traditionally, buildings were sited to take advantage of these aspects; the principle of 'wrap up warm and face south' is evident throughout the traditional architecture of the National Park.
45. Energy use and amenity value can also be improved by considering how siting, layout and landscape may shelter buildings from cold windy conditions that often prevail in exposed elevated rural and coastal sites. Landscaping and native tree planting can be used for shelter belts. This can be especially important when considering large agricultural buildings and their vehicular access requirements which can have a substantial impact on the landscape.

Siting of agricultural buildings

46. Preference should be given to new buildings which sit within or are well related to existing building complexes, since the existing development can help to provide a context which is less intrusive than new isolated development. However, it is recognised that such siting is not always appropriate, for operational, pollution control or other practical reasons. It may

need to be sensitively located on the building and be in a position and colour which does not dominate. Dark matt coloured flues tend to be the best design solution. Shiny metallic flues attract the eye and can also create unacceptable glare for neighbours over a long distance.

Roof lights in agricultural buildings

68. Normally non-opening these are designed to maximise day light in large single span buildings. However their use has wide ranging implications in the National Park in terms of allowing light pollution into dark skies and limiting the mitigation of having darker coloured materials to blend in to the landscape. Special consideration should be paid to their position (a chequer-board effect should be avoided as this further high-lights the light pollution).

Airtightness and ventilation

69. Ventilation systems should be designed and not rely on accidental leaks resulting from poor design. In low energy, low thermal capacity buildings unwanted air leaks can have a dramatic impact on heating costs. There must be evidence of a designed ventilation system.

Renewable energy

70. ~~All proposals, however small, should consider the energy efficiency and the installation of appropriate renewable energy systems, but what will be appropriate will depend on individual circumstances.~~ [The National Park Authority has prepared Supplementary Planning Guidance \(available on our website\) on Renewable Energy which provides detailed advice on the provision of solar, wind turbine and other technologies listed below.](#)

Solar

71. In addition to passive solar design, there are active systems, including solar hot water (water heated by solar energy), and photovoltaic cells (which convert light to electrical energy). Solar water systems are generally mounted on south facing roofs and can largely offset the cost of hot water. Solar water heating is a cost-effective renewable technology, and relatively simple to install.
72. PV or photovoltaics need daylight to convert light energy into electric energy. Again, these are ideally sited facing south and with no overshadowing from other buildings or trees.

73. Although solar panels tend to be roof mounted there is the option of ground mounted panels which should also be considered in sensitive locations and if roof mounting is inappropriate, for example on listed buildings.
74. Panel design is standardised in terms of width length and depth. The frame of the panel is normally reflective aluminium which can create a jarring visual impact. It is worth seeking out frameless panels or those with black trim; these look more discreet. New roofs can incorporate roof tiles which have PV properties which are an option especially in entirely new buildings.
75. Batteries are now becoming much more commonplace to store excess energy. Combining solar panels and batteries together with power supplies for electric items, including cars, would be leading towards self-sufficiency in term of energy requirements.
76. Agricultural buildings offer an ideal opportunity for a large roofspace to be utilised for energy creation. Rising costs of electricity are adding to the overheads faced by farmers and affect profitability. Farm buildings can provide large, uncomplicated roof spaces which are ideal for PV installations which can help farmers significantly reduce their energy bills. Where a south-facing roof with a suitable pitch can be incorporated into a design, solar panels should be considered for installation at construction stage or for the future. The initial design of the building should ensure it is strong enough to support the installation of panels on it. Putting solar panel details in the planning application for such additions should be considered a worthwhile option. Care should be taken to consider the visual impact – a darker roof (as panels can be) can assist with a building melting into the landscape thus creating a win-win situation.

Wind

77. In sensitive landscapes and Conservation Areas the visual impact of masted turbines can be an issue and great care needs to be taken in their siting.
78. For an average three bedroom home a 1.5 – 3 kw turbine will make a significant contribution to energy needs.
79. Wind turbines on farms should also be considered at a size and scale required for the farm's energy requirements. As these are likely to be larger than domestic installations further advice from the Pembrokeshire Coast National Park Authority should be sought. ~~The Authority has prepared Supplementary Planning Guidance on Renewable Energy which provides further advice on turbines and other technologies listed below.~~

Biomass

80. Biomass is the term used to describe fuel derived from renewable biological sources, such as wood pellets or chips. Modern biomass boilers are efficient and easy to maintain. If biomass heating is appropriate, designers need to

	Site Characteristics	Resources and Servicing	Project Size and Function
	appropriate to surroundings.		
Micro Hydro	Dependent on availability of suitable water resource.	The type of turbine suitable for a particular project will depend on the height from which the water travels (the 'head') and the flow rate of the water.	Range from a few hundred watts for domestic schemes up to around 300kW for commercial systems.
Heat pumps	Adequate area which can be excavated.	Best with under floor heating system.	-

Materials and resources

The problem defined - background and measures

86. The construction industry is a major consumer of land and raw materials and a major contributor to waste production. Around 50% of all global materials are used in construction. Building materials have an embodied energy content related to extraction, processing, manufacture, transportation, maintenance and demolition. [All opportunities should be explored to incorporate materials should be selected from natural, renewable or recycled resources and be which are](#) locally sourced. Material waste from construction amounts to around 400 million tonnes in the UK each year.

Measures

87. Calculations demonstrating savings in embodied energy are complex. However, by taking some simple steps such as reducing site waste and selecting materials with a low embodied energy rating, a significant contribution to improving sustainability can be made. A Construction Management Plan (CMP) [should be submitted with all major planning applications. The CMP should detail how waste will be processed on site, reducing and reusing where possible. Planning Policy Wales \(Edition 11\) states that "Planning authorities must consider the potential for temporary environmental risks, including airborne pollution and surface and subsurface risks, arising during the construction phases of development. Where appropriate planning authorities should require a construction management plan, covering pollution prevention, noisy plant, hours of operation, dust mitigation and details for keeping residents informed about temporary risks"](#)

[\(paragraph 6.7.26\).](#) The right materials, along with correct siting of the development, can significantly cut space heating costs.

Economic use of land

88. It is important that developments are not wasteful in their use of land, and that all available land is used to enhance its sustainability, for example through energy generation, habitat creation or by providing outdoor amenity. Designers, architects and builders need to think of the development of the site as a whole and design in sustainability in the widest sense of the word – using outdoor space to enhance habitats and encourage occupiers to understand the need for maintaining such spaces in the future. External space can often be multi-functional – for example a recreational space can also provide swales for water run-off and a habitat for wildlife, which can form part of the Sustainable Drainage applications.

Re-use of existing buildings

89. The re-use of existing buildings is generally encouraged within the framework of national and local planning policy in order to provide development opportunities and to sustain traditional buildings, landscape, townscape and local communities.

Design for re-cycling and modern methods of construction

90. Materials can be selected to ensure they can be reused or recycled in the future. Likewise, the current promotion of modern methods of construction for speed and resource efficiency may also have added value in terms of sustainability.
91. Prompts for designers
- Can recycled or reclaimed materials from accredited sources be used?
 - What proportions of the materials for your building are to be locally sourced?
 - Are the materials from renewable or 'certificated' sources?
 - Have you checked your contractor's waste policy?
 - Have Sustainable Drainage (SUDs) principles been applied to the scheme?
 - Have water-efficient appliances been specified?
 - Have compost toilets or bio-digesters been considered?
 - Is mains sewerage available? If on-site sewage disposal is required, what measures have been taken to address potential pollution of ground water?

Building materials

92. Building materials should be long lasting, locally sourced and from renewable or re-cycled sources [wherever possible](#); such materials include those salvaged from demolished buildings – this can help tie-in newly constructed buildings with their surroundings. However, such materials need to be verified to ensure they have not been removed from vulnerable buildings or stone walls.

Local materials

93. Local materials have traditionally contributed to distinctiveness and sense of place. The use of local materials is to be encouraged, provided they are fit for purpose within the principles of sustainable design. Consideration should be given to reusing materials found onsite. For instance, stone removed from the interior of existing traditional buildings to increase room size could easily be reused to provide stone boundary walling and create a local sense of place. Boundary treatment for all types of development (including agricultural) is particularly important in ensure a development contributes and enhances the public realm. All too often the sensitive consideration of gates, gate piers, and boundary treatments are not given sufficient weight in the overall design.

Low-impact building materials

94. New building materials should be selected on the basis of sustainable supply and minimal embedded energy in production and transportation. Timber is a relatively low impact, renewable material, but care must be taken that it is sourced from sustainably managed forests.
95. Other low-impact materials may come from natural sources for example, sheep's wool insulation, hemp thermal insulation, turf roofs and straw bales. Alternatively they may be derived from materials and components that are low energy in manufacture or processing.

Types of Materials for agricultural uses

96. Traditional local stone is a material which blends well with the rural environment. Local stone can be used to good effect as a plinth to a portal framed and timber clad building.
97. Vertical timber boarding is a popular cladding material, in particular for livestock buildings, and usually blends successfully with traditional buildings. Horizontal boarding can also be acceptable but needs to be considered with care as it tends to emphasis the horizontal width of buildings, which in the case of large span buildings is something which needs to be reduced not

emphasised. Careful use of preservative treatments can also have a positive blending effect for buildings – colours do fade and weather over time and this should be considered when making the choice. Plywood, blockboard, hardboard and similar sheeted timber materials are generally visually unsatisfactory, and are unacceptable.

98. Plastic coated metal sheeting can have a good appearance if a suitable colour is chosen. It requires no maintenance, has an extremely long life, erection is simple and the sheets can be re-used. It is available in a range of suitable colours and profiles. Coloured fibre cement sheeting is also acceptable. As a general rule, the bigger the building, the bigger should be the profile (i.e. the distance between the corrugation which gives the ripple appearance). For smaller buildings traditional rounded corrugation is appropriate.

Colour of Materials in the landscape

99. The use of appropriate colour is very important when trying to make the building fit into its surroundings. Dark colours have less visual impact. Most materials come in a range of colours and the following general advice is given:
- use dark matt finishes on roofs and walls such as brown, dark green, black or dark grey which blend well with the landscape and a building will appear to be smaller.
 - choose a darker colour for the roof – the roof reflects more daylight than the walls and so will appear lighter if coloured the same as the walls.
 - avoid a large expanse of a single colour for walls – a blend of materials or shades can be preferable.
 - colour-coated sheets are preferable to some through-colour pigmented sheets, as they give more even and long-lasting results.
100. Natural Resources Wales has produced guidance on the benefits of using colour in base line analysis to manage change in the landscape.⁴ Key points from feedback and discussion in the preparation of the guidance and how this may be used for planning proposals are set out below:
- Consensus that colour was a significant factor in considering development.
 - Understanding the role colour plays in contributing to local identity is fundamental to the successful management of change and the integration of new built form into the landscape.
 - Guidance for colour and materials selection can also help conserve and promote some of the special qualities of a landscape.
 - Previously samples would have been used, but now appreciate that understanding the context is also important to get the colour right in a setting.
 - Winter surveys – are best to give an all year-round starting point for the assessment.

⁴ [Web address from Natural Resources Wales pending](#)

contaminants before being released into the soil or the sewer network. These can be small, and fitted to individual downpipes, or they can be larger, and used within road schemes.

- **Swales:** Long, shallow, landscaped channels that reduce the speed of surface water - cleaning it and where possible allowing it to gradually infiltrate into the soil. Where it is not possible for the water to infiltrate the water into the ground, the swales gradually return the water into the sewer network at a slower rate.
- **Porous paving:** Paving that is designed to allow surface water to pass through it, rather than over it into nearby drains. Porous paving comes in a variety of appealing designs.
- **Filter strip:** Filter strips are strips of ground where water running off a site can pass through it, allowing some or all of it to soak away. The rest often enters a swale or another sustainable drainage system.
- **Grass channels:** These are strips of grass that can be installed on side streets and back alleys of terraces to provide a permeable surface for water to soak through.
- **Geocellular storage:** Geocellular systems can be used to control and manage surface water runoff either as a soakaway or as a storage tank. These can be installed beneath roads and kerbs and help to reduce the speed at which surface water enters the sewer network.⁶

Efficient reuse of water

115. [The feasibility of R](#)ainwater harvesting ('greenwater') for non-drinking purposes and a 'greywater' system (using water from dishwasher and machine washing) for toilet flushing should be considered at an early stage in the design process. Developers should provide occupiers with information on fixtures and fittings designed to reduce the use of water (e.g. dual flush toilets) and details of a rainwater harvesting and/or grey water reuse system.

Landscape and Biodiversity

Landscape

116. National Parks are essentially cultural landscapes. Their building blocks are provided by internationally renowned geology and natural heritage. Landforms have subsequently been moulded by millennia of human habitations – farmland, buildings and settlements, roads, hedges and walls. Buildings and settlements contribute significantly to the character of our landscapes and to the rich diversity of qualities that make them special. Good building design must be sensitive to the character of its landscape setting, and must seek to enhance rather than detract from its special qualities. The

⁶ Dwr Cymru-My Wastewater Service RainScape

122. In recognition of the cultural and historical importance of landscapes and their need for careful management, Cadw has produced a Register of Landscapes of Outstanding and Special Historic Interest in Wales identifying 58 Historic Landscapes across Wales that are of national importance. Both contribute hugely to the special qualities of the National Park.
123. There is now a recognition that biodiversity is not merely a nice-to-have addition in a development, but a necessity if we are to ensure our own futures. As stated in Planning Policy Wales [4011 \(page 120 second paragraph\)](#): By protecting and enhancing biodiversity, and our natural environment more generally, it will be possible to future proof economic assets in response to the challenges presented by climate change, to promote low carbon and appropriate resource choices which address the causes of climate change and to provide cost effective ecosystems services such as clean air and water.
124. The emphasis on maintaining and creating wildlife habitats through the planning process has been clarified by Welsh Government in a letter from the Chief Planner to all Heads of Planning in October 2019:
- ‘where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission.’⁷
125. All development including residential, community, tourist and agricultural has a vital role to play in the conservation and enhancement of biodiversity and geodiversity of our National Park. Ensuring continuity and enhancement of habitats will be increasingly important if species are to adapt or move in response to climate change. Careful thought needs to be given, from design to execution, to avoid and minimise damage to the natural environment. The Authority is preparing supplementary planning guidance on biodiversity.

How can development have a negative impact on biodiversity and geodiversity?

126. Potential negative impacts can include:
- Outright destruction or damage to semi-natural habitats, such as woodlands and flower rich meadows.
 - Loss or damage to wildlife “corridors”, such as traditional field boundaries and rivers, which provide colour to our landscape and link remaining areas of semi-natural habitats, providing routes for bats, birds, small mammals and invertebrates.
 - Loss or damage to geological features, for example through quarrying and landscape restoration schemes.

⁷ Biodiversity enhancements: guidance for heads of planning | GOV.WALES

time for survey work, as they are often only able to be done in certain seasons.

- Assess the impacts of your proposals on the natural environment, and seek guidance on how damage can be avoided or, at the very least, minimised. Retain existing trees and hedges wherever possible.
- Consider how a new or converted building could provide roosting and nesting opportunities for bats and birds. Features like dedicated bat lofts or swift nest boxes / bricks recessed into the roof space could make a significant contribution to local biodiversity.
- Consider landscaping for wildlife: planting trees and shrubs that are native to the area to augment existing trees, hedges and woodland edges, and providing sources of nectar for butterflies and insects. The result – a colourful and exciting garden, which the birds and bats will also love.
- Consider the impact of external lighting on the surrounding area, and seek out designs that minimise “backscatter” and general light pollution.
- Consider how to minimise the effect of water run-off from hard surfaces into ditches, rivers and streams with the use of SuDS.
- Explore ways of protecting and enhancing any habitats and geological features that are individual to your site as an integral part of the design of your scheme.
- Where exterior or street lighting is necessary – question how light pollution disturbance can be minimised, for example by use of a full cut off fixture and a low-pressure sodium light source.

Place and Local/Historic Distinctiveness

132. Conservation of the National Park’s special qualities and local distinctiveness is paramount. Place making is about ensuring that this protected landscape retains its unique character. The guidance encourages the use of appropriate aspects of local design traditions to produce developments which are fit for purpose – now and into the future. In the preparation of this guidance the aim has therefore been to dovetail these critical issues of sustainability and place-making within the setting of the Pembrokeshire Coast National Park.
133. This is not to say that we shouldn’t look at new technologies, but rather take innovative design and fit it into the landscape context. -We may on occasion be at the forefront of innovative design and look back and learn from these. [Assessing such contemporary designs do however require a particular focus and attention in terms of considering integration in a specific landscape and seascape areas.](#) Design issues may take the occupation of a building – say 10 years on from construction - for us to ascertain its true sustainability credentials.
134. New developments should be designed to enhance the quality of their surroundings, being sympathetic to the immediate and wider context. This does not eliminate contemporary design; rather it should promote it.
135. Buildings, building groups and settlements must respond to their landscape settings and their visual, aesthetic, historical, cultural and ecological aspects.