

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. One was a guidance document prepared jointly with Pembrokeshire County Council.

Cumulative Impact of Wind Turbines - Guidance prepared jointly with Pembrokeshire County Council
Coal - Land Instability
Loss of Hotels and Guest Houses
Regionally Important Geodiversity Sites
Safeguarding Minerals Zones
Angle Conservation Area
Caerfarchell Conservation Area
Caldey Conservation Area
Little Haven Conservation Area
Manorbier Conservation Area
Newport Conservation Area
Portclew Conservation Area
Porthgain Conservation Area
Saundersfoot Conservation Area
Solva Conservation Area
St Davids Conservation Area
Tenby Conservation Area
Trefin Conservation Area

3. The guidance document on Cumulative Impact of Wind Turbines covers the whole of Pembrokeshire and was prepared with Pembrokeshire County Council. The rest cover the Pembrokeshire Coast National Park only. In September 2021 this Authority agreed to publish these draft Supplementary Planning Guidance documents for public consultation.
4. A public consultation on the guidance started in early January 2022 and ended on the 15th April 2022. 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.

Electronic copies were made available on our websites with paper copies available at Llanion and Oriell y Parc. The consultation period for all documents ran until 4.30pm on 15 April 2022. A reminder of the impending closing date for comments was placed in a press release in mid-March 2022.

Officer Appraisal

5. A report summarising the results of the public consultation and identifying recommended changes to the Supplementary Planning Guidance is attached at [Appendix A](#). The Loss of Hotels Guidance responses require more to be undertaken and are not reported at this time.
6. The responses (excluding Loss of Hotels) have resulted in thirty six individual representations being logged. [Appendix B](#) contains the full text of those representations that were difficult to insert in full 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.
7. The main issues and changes identified to the Supplementary Planning Guidance following the public and internal consultations are:
 - a. **Cumulative Impacts of Wind Turbines:** Clarification was sought in relation to how National Park purposes are referred to in the document; the role of National Park planning policies contained in Local Development Plan 2; how cumulative impacts are considered alongside Environmental Impact Assessments; how onshore turbines are considered alongside offshore proposals and how the distances used to define search areas for turbines vary from ranges to providing distances.
 - b. **Land Instability** – Former Coal Workings: Minor comment only.
 - c. **Safeguarding Minerals Zones** – Introducing Minerals Safeguarding Assessments proposed and the approach taken to defining a buffer adjacent to existing development queried.
 - d. **Conservation Areas:** Minor comments on Newport and Tenby Conservation Areas. Detailed comment provided on the Trefin Conservation Area document including the Authority's approach to consultation and engagement. A proposed response is provided along with edits to the documentation.
8. It is understood that Pembrokeshire County Council is considering its response to the consultation on the 7th November 2022 at its Cabinet meeting.

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

Financial considerations

9. The Authority had money 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

10. 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

11. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. 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

12. 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.
13. Assessing impacts on the Welsh language is also an integral part of the Sustainability Appraisal process for Local Development Plan preparation.
14. 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 on the topics set out below subject to the amendments set out in Appendix C to this report ²:**

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

Cumulative Impact of Wind Turbines - Guidance prepared jointly with Pembrokeshire County Council
Coal - Land Instability
Regionally Important Geodiversity Sites
Safeguarding Minerals Zones
Angle Conservation Area
Caerfarchell Conservation Area
Caldey Conservation Area
Little Haven Conservation Area
Manorbier Conservation Area
Newport Conservation Area
Portclew Conservation Area
Porthgain Conservation Area
Saundersfoot Conservation Area
Solva Conservation Area
St Davids Conservation Area
Tenby Conservation Area
Trefin Conservation Area

- 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 Cumulative Impact of Wind Turbines Supplementary Planning Guidance. 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 \(edition 3, March 2020\)](#)

[Planning Policy Wales, edition 11](#)

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

*Authors: Martina Dunne, Gayle Lister, Sarah Hirst, Phil Barlow (Park Direction)
Consultees: Tegryn Jones, Pembrokeshire County Council, Forward Planning*

Report of Consultations
APPENDIX A
Supplementary Planning Guidance

Rep No.	Reference	Representation	Officer Response and Recommendation
General			
1.	2617/ Woodland Trust Wales	<p>Coed Cadw - the Woodland Trust works at national level to seek to create a favourable policy environment for the retention and expansion of tree cover in Wales.</p> <p>Please see Appendix B for the full representation.</p>	<p>Comments noted.</p> <p>The representation is beyond the scope of these guidance documents and does not comment on any specific item of Supplementary Planning Guidance.</p>
Cumulative Impact of Wind Turbines			
2.	4705/ NRW Landscape	<p>We welcome and support the Joint Supplementary Planning Guidance (SPG) on the Cumulative Impact of Wind Turbines on Landscape and Visual Amenity. The SPG will provide useful guidance for both planning authorities. We suggest some changes which could help clarify the guidance, which are detailed below.</p> <p>The document is an update to the previous document of 2013, published by the Pembrokeshire Coast National Park Authority (PCNPA) as draft SPG and adopted in 2013. The draft SPG was rolled over for PCNPA's Local Development Plan (LDP) 2 and this document will replace the rolled over guidance. We support the requirement for an assessment of both combined and additional cumulative effects where Cumulative Landscape and Visual Impact Assessment is considered necessary, as set out in 1.12.</p>	<p>Support noted.</p> <p>Support noted.</p>
3.	4705/ NRW Landscape	<p>We suggest a re-wording of 2.14, in relation to the National Park, where it states, 'no significant adverse cumulative change to its purposes, special qualities and sensitive characteristics.' The purposes themselves would not change, rather, conflict with the purposes e.g. to conserve and enhance natural beauty and adverse effects on the special qualities and sensitive characteristics could occur.</p>	<p>Agree. Delete reference to 'purposes' in the sentence. See Appendix C for edit.</p>
4.	4705/ NRW Landscape	<p>Care is needed with the use of the Environmental Impact Assessment (EIA) term 'significant'. This is particularly the case with cumulative effects, where</p>	<p>Advice noted. Footnote added to paragraph 2.14. See Appendix C for edit.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>numerous adverse effects that fall below the EIA threshold of significance, can nevertheless conflict with the purposes of a national designated landscape and undermine the special qualities. 2.14 (2nd bullet) goes on to state that unacceptable impact, here is taken to mean where wind turbines significantly adversely affect the purposes or special qualities of the designated area and/or become a dominant or key characteristic of a landscape, depending on its sensitivity.</p>	
5.	4705/ NRW Landscape	<p>The wording of 2.14 appears to set up some conflict with Table 1. For example, one or several large scale, but distant wind turbines/farms within the setting of a designated landscape could be noticeable or conspicuous but fall below the EIA threshold of significance. This could, however, change the landscape from category 1 (no wind turbines) to 2 (occasional wind turbines within or intervisible with the landscape). The scale of wind turbine/farm need not be small or medium in the case of intervisibility, as this would depend on the distance. Paragraph 3.10 notes that a change from one category to another may be a significant combined cumulative landscape effect. This would presumably include a change from category 1 to 2.</p> <p>Paragraph 2.14 also appears to be somewhat at odds with LDP Policy 8 Special Qualities, as described in 10.19, which is concerned with PCNPA priorities to protect and enhance and with Policy 14, which refers to the conservation and enhancement of the National Park – ‘development would not be permitted where it would adversely affect the qualities and special character’, although this policy does refer to ‘significant visual intrusion’.</p>	<p>The text in Table 1 advises: ‘<i>The scale of turbine is likely to be small or medium at most.</i>’ which would not preclude the situation referenced. No change is needed to for this situation to be considered.</p> <p>Agree.</p> <p>Pembrokeshire Coast National Park Local Development Plan 2 also includes Policy 33 Renewable Energy which works alongside Policy 8 and 14 to support the provision of some renewable energy that is compatible with the National Park landscape. This allows for limited change without adversely affecting National Park special qualities.</p>
6.	4705/ NRW Landscape	<p>Table 4 (8.3) provides recommended search and study areas for cumulative assessments. We question why some recommended areas are given in a range of distances and some are one distance. We suggest for consistency, either a range or one average distance is provided. Paragraph 8.6 states that this is for onshore developments. This should be clarified on Table 4 to avoid confusion.</p>	<p>The approach reflected the degrees of certainty of the underlying data. However, as the majority of values are single distances and in reviewing the underpinning analysis we have gone for this approach to give developers certainty on the requirements for all sizes of turbines. Table 4 has been amended to give single distances.</p> <p>See Appendix C for edit.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
			<p>The title for Table 4 has also been revised to indicate it is for onshore developments.</p> <p>See Appendix C for edit.</p>
7.	4705/ NRW Landscape	<p>In Appendix B the rationale for recommended areas for cumulative assessment search and study areas, provides a detailed explanation of how the distances in Table 4 have been arrived at, based on Scottish Natural Heritage, offshore energy strategic environmental assessment recent proposals and NRW Guidance Note 46 information. Table 4 uses a slightly different set of ranges to the NRW guidance. The NRW guidance for study areas is similar but slightly larger, with a distance range. The search areas are considerably smaller. The NRW guidance has taken an approach which aims to focus on areas where proposals would be likely to have significant effects and be proportionate to the proposal, in line with EIA guidance. The differences are not major and as stated, are a matter of judgement. We do suggest that the recommendations for extremely large search areas may be questioned on proportionality.</p>	<p>NRW Guidance Note 46 rule of thumb distances are essentially based on the analysis of visual effects of offshore wind farms carried out by White Consultants for NRW. (Notes 315 etc). These distances are not for cumulative effects. NRW Guidance Note 46 does not make any distinction between distances for cumulative and individual effects which is why the search area is smaller. Cumulative effects guidance needs to consider at least two windfarms which may have similar effects on a receptor between them and therefore the distances for considering effects can double in a worst-case scenario. The search area radius for the largest turbines has been set at 60km (rather than 60-70km) to recognise that effect of onshore developments do diminish at longer distances to a greater extent than offshore turbines which do not usually have intervening features in view.</p> <p>This guidance also focusses on onshore development which is why its detailed study area distances for larger turbines are smaller than NRW's. This is an indication that the guidance is proportionate, in line with EIA guidance. The basis for this guidance's conclusions is slightly different to NRW's so it is considered that the two documents can sit alongside each other without being identical and each can be useful in guiding developers in individual cases.</p>
8.	4459/ Barton Willmore now Stantec	<p>Paragraph 5.1 of the draft SPG states <i>"Whilst it is recognized that the vast majority of cumulative effects that will occur will be between onshore wind turbine developments, the interaction between onshore and offshore wind turbines should also be addressed where applicable"</i>. It is noted and agreed that in the vast majority of cases, the potential for effect interactions</p>	<p>The sentence is reflecting the frequency with which there will be an onshore and offshore scenario rather than a judgement on what the potential effects will be.</p> <p>The approach for onshore offshore interactions is set within the context of the guidance's sections on the scope of the guidance and detailed</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>between onshore and offshore wind projects are limited.</p> <p>However, under 'Approach' (paragraph 5.6) the guidance states <i>"If the proposal is intervisible with an area of sea or coast along with another terrestrial wind energy development and/or offshore 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 NRW contextual studies"</i>. This suggested approach is not considered to reflect the overall aim of CLVIA, and indeed embodied in the EIA and LVIA processes as a whole, that the focus should be on likely significant effects. This primary aim is embodied by the draft guidance itself which states: <i>"cumulative impact assessments are only required where it is considered that the proposal could result in significant cumulative impact which could affect the eventual planning decision"</i> (paragraph 1.15).</p> <p>The current wording of paragraphs 5.6 and 5.7 fail to include reference to the focus on significant effects and instead could be understood to mean that 'a CLVIA should include interactions between onshore and offshore schemes if they have intervisibility regardless of whether those effects are likely to be significant or not.</p> <p>Including schemes based on intervisibility and in particular theoretical visibility alone is likely to result in CLVIAs becoming overly complicated and too wide in scope, thereby limiting their usefulness to the determining authority and the lay reader. As such we consider that paragraphs 5.6 and 5.7 should be amended to include reference to the focus on likely significant cumulative effects in the interests of proportionality.</p> <p>Of further note is that paragraph 5.6 refers to a proposal being intervisible with <i>'an area of sea or coast'</i>. Both these features are naturally vague and mutable; in places, what would be defined as the sea could move in and out by hundreds of metres with the tides. Similarly, where does the coast end and inland landscapes begin. We consider that these terms need to be</p>	<p>advice on the application of Environmental Impact Assessment requirements in relation to cumulative effects earlier in the guidance. No change is required.</p> <p>The wording is considered adequate to alert the reader, as a starting point, for the need to consider the potential impacts of onshore and offshore wind turbines cumulatively.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>defined in the guidance so as to provide clarity to an assessor or decision maker where intervisibility would result in a scheme being scoped in, and where it would not. Again, the emphasis should be on the professional judgement of the assessor, in consultation with the determining authority, with a focus on proportionality and likely significant effects.</p> <p>Notwithstanding the above, we do support the revised Key Objectives section (2.14), particularly the wording “provide a positive framework for wind energy and accept some landscape change providing ... there is no unacceptable cumulative impact on the surrounding landscape”. This proactive stance and acceptance of landscape change outside of designated areas is considered to be essential to meet net zero objectives.</p>	Support noted.
Land Instability – Former Coal Workings			
9.	3617/ Coal Authority	We are pleased to see recognition of the potential risks posed by past coal mining activity and signposting to the need for relevant development proposals to be supported by a CMRA.	Support noted.
Safeguarding Minerals Zones			
10.	4322/ Minerals Products Association	Having reviewed the draft supplementary guidance I would advise the author of the guidance to review the information in two documents. Firstly the BGS ‘ <i>Mineral Safeguarding in England: good practice advice</i> ’ and ‘ <i>MPA/Planning Officer’s Society ‘Guide to Minerals Safeguarding’.</i> ’ Whilst both documents focus on safeguarding in England, the principles specified apply equally to Wales.	The guidance referred to is English Guidance and would not require consideration for Welsh planning authorities. Reference to the document in this guidance would therefore confuse.
11.	4322/ Minerals Products Association	<p>Para 2.1: The text states “Exceptionally the application can be refused”. We feel that the “approval” of planning permission in MSAs should be the exception, not their ‘refusal’. The purpose of MSA is to protect minerals from sterilisation and inappropriate development. This will then reflect the guidance in the Table on page 4 of the guidance, where approval is the exception and not the rule, subject to meeting specific criteria.</p> <p>Amend the text to read “<i>Exceptionally the application may be approved, subject to meeting the requirement specified in this guidance</i>”.</p>	<p>Agree to deleting the words ‘Exceptionally the application can be refused’ without replacement. The planning authority would then be able to judge each case on its merits, in accordance with Local Development Plan policies and national guidance.</p> <p>See Appendix C for edit.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
12.	4322/ Minerals Products Association	<p>Para 3.2: The text states “The flow chart attached to this guidance provides an indication of the process and questions which should be answered”.</p> <p>Disappointingly the guidance does not appear to reference the need for Mineral Resource Assessments (MRA) which are imperative where development proposals fall within MSAs. The MPA/POS guidance referred to provides clear advice on the need for MRAs in the development management process. It is appropriate for planning application proposing development in an MSA to be accompanied by and MRA to allow the planning officer to determine whether or not there is a mineral sterilisation issue and associated conflict in planning policy to inform the judgement of the planning authority.</p> <p>Amend the text to make appropriate reference to the requirement to submit a Mineral resource Assessment for development proposals within an MSA.</p> <p>Para 3.2: The text also states that “A proportionate approach will be taken; the level of information required will depend on the specific details of the proposed development”. It is not clear how a ‘proportionate approach’ can be followed without an appraisal of the mineral resource which will potentially be sterilised.</p> <p>Amend the text to reflect the need for an MRA to accompany any planning proposal within an MSA to inform the development management process.</p>	<p>The document referred to is English Guidance and would not require consideration for Welsh planning authorities. Reference in the guidance would therefore confuse. The Authority’s own guidance provides a step-by-step approach to dealing with proposals and a proportionate approach is needed because what is being dealt with will differ from a householder application which is relatively straight forward to a necessity to set out a case to establish overriding need. Even then the case may have already been made through the Local Development Plan preparation process. Applicants and agents are familiar with the guidance which has been in operation since the early 2010s without issues arising with its interpretation. Mineral Resource Assessments might assist on large sites / in complex cases, but for smaller applications and householder applications would seem to be burdensome.</p>
13.	4322/ Minerals Products Association	<p>Page 4: The Mineral Sterilisation Table makes no reference to the need for an MRA to accompany any relevant planning application within an MSA. The Table appears only to require the applicant to justify the development and gives no consideration to the need to assess the minerals potentially being sterilised.</p> <p>Amend the Table to require applicants to submit an MRA to inform the planning process where development proposals lie within an MSA.</p>	<p>The Sterilisation Table sets out how the overriding need can be established so that the choice of location is unavoidable.</p> <p>The Prior Extraction Table then prioritises the need to consider impact on the National Park landscape followed by a series of steps to consider the appropriateness of extracting the mineral prior to development.</p> <p>This guidance is consistent with the approach set out in the adopted policy of the Plan Policy 21 Minerals Safeguarding.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
14.	4322/ Minerals Products Association	<p>Page 5: The Table entitled Prior Extraction makes reference to a 200m buffer zone. This misquotes MTAN1 and suggests that “National Planning Guidance states that blasting should not take place within a 200m buffer zone around any sensitive development”.</p> <p>This is incorrect. Buffer Zones are specific to mineral operations. Para 70 of MTAN1 is clear that “MPPW (paragraph 40) established the principle of Buffer Zones around permitted and allocated mineral extraction sites.” Proposals to prior extract minerals will need to consider any potential environmental effects of working the minerals from the MSA. Distances from sensitive properties will generally be informed by EIA and agreed through the planning process.</p> <p>Delete the current text and amend to properly reflect national planning policy and guidance.</p> <p>Page 5: The text states “The developer will need to demonstrate why it is not practical or feasible to extract the mineral.” Unfortunately the guidance does not indicate how this should be done. The guidance should detail the measures necessary to inform the planning process through provision of an MRA, by the applicant, in support of any planning application within an MSA.</p> <p>Amend the text to include reference to the requirement for MRAs to accompany any planning application.</p>	<p>The commentator is correct in advising that national planning policy refers to buffer zones being defined around minerals sites. 5.14.44 of Planning Policy Wales Edition 11 advises: <i>Buffer zones should be used by planning authorities to provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted.</i></p> <p>MTAN1 paragraph 71 advises that: <i>‘The objective of the buffer zone is to protect land uses that are most sensitive to the impact of mineral operations by establishing a separation distance between potentially conflicting land uses.’</i></p> <p>The approach set out in the safeguarding minerals guidance is considered an appropriate approach to take to provide guidance to applicants as it reflects the aims of national guidance.</p> <p>Amendments to the Prior Extraction Table and flow diagram entitled ‘Planning Application within a Minerals Safeguarding Area’ are proposed to clarify reference to Buffer Zones and to remove reference to an obsolete footnote.</p> <p>See Appendix C for edit.</p> <p>The issue of adopting a proportionate approach is dealt with in an earlier response.</p>
15.	4322/ Minerals Products Association	<p>Page 7: The spreadsheet makes reference to “Buffer Zones” yet does not provide guidance on the appropriate methodology to determine the presence of minerals through undertaking an MRA.</p> <p>Firstly the spreadsheet is incorrect in its reference to MTAN1 and the application of Buffer Zones, Secondly there is no detail on how the minerals should be assessed. Reference to the MPA/POS guidance may benefit this process.</p> <p>Amend the text accordingly to properly reflect national planning policy and guidance and make use of best practice in relation to MRAs.</p>	<p>The approach set out in the supplementary planning guidance is consistent with Authority’s adopted Local Development Plan and with national planning policy and guidance as explained in the responses set out above.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
Conservation Areas			
Newport Conservation Area			
16.	0339/ S Bayes	<p>1.This is an attractive and beautifully illustrated publication, which should increase understanding and appreciation of the built environment amongst residents and visitors alike, increasing pride in the environment and sense of wellbeing.</p> <p>2.I fear the risks to the conservation area are understated – from inappropriate, though modest changes to properties which the National Park can't hope to adequately monitor, through pressures for more building of residential properties affecting settings, the difficulty defining good quality contemporary design, the visual impact of traffic solutions, to the most worrying, probably, and certainly challenging – sea rise and inundation.</p> <p>3.Under 'Historic Development and Archaeology', the statement "<i>whether the Hen-gastell site at the foot of Long Street / Lower St. Mary's Street was the original castle is in doubt – more likely the existing castle is the original site, or possibly it existed closer to the Parrog</i>" does not correspond with information given by CADW - https://cadwpublic-api.azurewebsites.net/reports/sam/FullReport?lang=&id=456</p>	<p>1.Support noted.</p> <p>2. Noted</p> <p>3. It is proposed to add an extra sentence: <i>Cadw considers the castle to be the original core of the settlement prior to its migration southward.</i></p> <p>See Appendix C for edit.</p>
Tenby Conservation Area			
17.	3511 / Tenby Civic Society	<p>Errata:</p> <p>Map 4 " a typical seaside villa" should be 'village'</p> <p>Figures 15 and 16 have no caption</p> <p>Para 55: 'Post Office' not 'Post Officer'</p> <p>Para 134: no 'the' needed in 'but the care must'</p>	<p>The map has been amended to address the typo (see Appendix C for edit)</p> <p>All errata amended.</p>
18.	3511/Tenby Civic Society	<p>Members of the Executive Committee of Tenby Civic Society recently discussed the report and welcomed it, and the new format with sections for each area.</p> <p>The conciser approach has resulted in a few small details we felt were important being omitted, so we suggest some short additions below: We welcome the main body of the report in its entirety.</p>	<p>Support noted.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Para 37: add to poor quality pavements; finger posts need renovation Add to loss of trees; replacements need to be smaller sized trees in this tight urban area Add an extra item – Lack of public access to viewing level of Town Walls.</p> <p>Para 44: add – valerian damage to curtilage stone walls.</p> <p>Para 47: add – Queens Parade has a cohesive well preserved late Victorian group.</p> <p>Para 48: add, while battery Gardens provide an elevated wide vista south over the Ritec basin.</p> <p>Para 49: trees – add – or screening the Area boundary with the multi-storey car park.</p> <p>Para 51: add – valerian and ivy damage to curtilage stone walls (see in figure 27). Para 57: add – valerian damage to curtilage stone walls (see in figure 31)</p> <p>Para 64: after ‘from the north’ add – and by Blind Lane’s recently upgraded footpath. Slippery Back has traffic management issues for peak visitor parking and cycle crashes on the Cycle Route at the Triangle.</p> <p>Para 108: include – Full width dormers are normally to be avoided.</p>	<p>Agree to amend text in line with the detailed comments.</p> <p>See Appendix C for edit.</p>
Trefin Conservation Area			
19.	4704 / Paul Niedzwiedzki	<p><u>Consultation</u> It is disappointing that no active attempt has been made to involve the Trefin community directly, for example, by letting the Llanrhian Community Council and Gwellian Trefin Improvement (GTI) group know about the consultation. The consultation document is dated 15 September 2021 but neither the LCC nor the GTI was aware that it had been issued until it was recently discovered on the Pembrokeshire Coast National Park Authority website. It is not sufficient when consulting on such matters merely to post the document on the PCNPA website and expect interested parties to come upon it by accident, not least when the document is only a small part of a wider consultation flagged on the website simply as,</p>	<p>In terms of consultation the Authority has a consultation list for development planning to which the Gwellian Trefin Improvement Group will be added as a result of this consultation. Llanrhian Community Council are statutory consultees and are consulted with on all supplementary planning guidance affecting the National Park.</p> <p>Wider publicity is also provided to capture new consultees.</p> <p>The documentation sent out highlights what areas the guidance relates to as well.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>“Supplementary Planning Guidance”, with no indication on the initial landing page that it contains 18 separate documents, including one relevant to Trefin. When the PCNPA sets store, as it evidently does in other documents and in the original Trefin CA document, on the importance of consultation, proofs of this commitment would have been to write to the Llanrhian Community Council and GTI to inform them of the consultation, and, at an even earlier stage, to have let them know that the original CA document was to be revised. Given that the Trefin community has only recently found out about this consultation, it is suggested that the deadline for comment should be extended significantly. This would allow, for example, special GTI and LCC meetings to be arranged to discuss the revised document.</p> <p>In the section on “Weaknesses” in the 2011 CA document some of these (see para 2.3) are listed as “perceived lack of consultation from the public realm”, and “perceived failure in communication between partnerships”.</p> <p>Given the lack of any attempt at active consultation on the revised document, it would appear that little has changed in these respects since 2011.</p> <p>In addition to the website version, it would have been helpful to have issued some print copies of the document. There is no indication that any were issued and none was to be found in the main library in Haverfordwest. It is suggested that the issue of print copies of consultation documents to key stakeholders (e.g. Llanrhian Community Council and GTI) and Pembrokeshire County Council libraries, and availability of print copies to members of the public on request should be a standard practice as part of any future PCNPA consultations. Consultees should be able easily to compare previous and proposed documents without having to toggle awkwardly between online versions.</p>	<p>The guidance was approved for consultation in September 2021. In order to publish for consultation the documentation (for all the Conservation Area proposals) had to be translated which took until before Christmas 2021. The consultation was then launched in January 2022 and the consultation ran for over three months.</p> <p>Officers offered an extension to the deadline to the Community Council which was not taken up.</p> <p>There are contact details if commentators have any queries regarding the documents or require paper copies of the guidance new or old. We specifically provide an opportunity for Community Councils to obtain a paper copy free of charge.</p> <p>The comments regarding the 2011 Guidance document relate to the SWOT analysis within the SPG of 2011 where the ‘weaknesses’ section included these generic perceived failings – not specific to Trefin.</p> <p>In an attempt to cut down on our carbon footprint we no longer place copies in libraries but do place copies in Oriol y Parc and the main Authority office in Llanion.</p>
20.	4704 / Paul Niedzwiedzki	<p><u>Description of the Conservation Area</u> The new draft contains much more information on the CA, including useful sections on “Historic Development and Archaeology”, “The Conservation Area and Its Setting”, and “Building Materials and Landscape Setting”. This expansion is helpful, and an improvement over the 2011 version.</p>	Support noted.

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>However, it is impossible to view the maps on pages 3, 31 and 32 in sufficient detail as the online version is not published at a high enough resolution. The map on page 3 is badly laid out in that it is overlain with numbers in circles and arrows that obscure important buildings and boundaries in the centre of the village. Also, Maps 1 and 2 are not labelled. The maps contained in the 2011 version are much better, clearer, and easily capable of enlargement.</p> <p>The map on page 3 of the new document has a key that includes two green areas, one signifying "Tree Preservation Order/Trees important to setting" and the other "Opportunity for improvement of forecourts/curtilage/shop fronts". These seem to match the green hatched areas in the 2011 version, labelled "Trees important to the setting of the Conservation Area". It is unclear therefore whether the new map in fact identifies any areas matching the description of "Opportunity for improvement of forecourts/curtilage/ shop fronts", and, if not, why there is need for two green shaded areas in the key. The inability to enlarge the map does not help to clarify this.</p> <p>The 2011 version contained a map entitled "Conservation Area Opportunities". This was helpful in showing the areas where there were opportunities for improvement of different sorts (frontage, building, area, public realm). There is no similar version in the 2021 revision, which is a backward step. It might be argued that the need for this map was negated by the development of a "comprehensive Proposals Document for Trefin CA setting out how its special qualities can be preserved and enhanced for both now and the future" as envisaged at page 15 of the 2011 document, but this has never been produced.</p> <p>On Map 3 "Outlying areas important to the setting and character of the Conservation Area it appears that the triangular field to the east of Cefn Gallod is excluded as it is not shaded orange like the rest of Areas A and B. If so, this would match the map on page 29 of the 2011 version, though there would seem to be no logic in excluding one field from the rest. Why should one field adjacent to the CA boundary be any less important to its setting and character than the rest? If an area is to be excluded when surrounded by areas that are considered</p>	<p>The Authority will include High Resolution Maps as a separate document for each Conservation Area SPG when uploaded on the website.</p> <p>The green shaded area relating to 'Opportunities for improvement of forecourts / curtilage / shop fronts' is not relevant to Trefin and is proposed to be removed from the map key (see Appendix C for edit).</p> <p>In addition, the green hatched area in the key relating to 'Opportunities for enhancement' is also proposed to be removed from the map key (see Appendix C for edit).</p> <p>Agree to the inclusion of Cefn Gallod and the triangular piece of land to the east of Cefn Gallod in the Outlying Area on Map 3. See Appendix C for edit.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>important to the CA setting, one would expect the reason for this to be set out in the CA document.</p> <p>On page 28 of the 2011 document, it was suggested that the boundary of the CA should be reviewed to include two areas:</p> <p>a) "Boundary to south-east should include fields with boundaries and tree to south of Cartlett House"</p> <p>b) "The fields leading down to the valley at the rear end of Ffordd y Felin with the footpath alongside Gorwel"</p> <p>The document goes on to state, "These suggestions will be considered in closer detail as a separate legislative process and will be subject to full public consultation." However, the proposed boundary of the CA remains exactly as in the 2011 document, and there is no reference to any closer consideration having been given to the addition of the two areas suggested. This issue needs to be resolved before confirming the new document, requiring full public consultation on the potential extensions to the CA boundary. The inaction on the commitment given in the 2011 document matches the failure to follow through on many other commitments given in that document.</p> <p>Under "Essential Open Areas" at para 83, these are stated to include "small private and public gardens, the old and new cemeteries and the harbour area". The CA has no cemeteries or harbour, which suggests that this text was wrongly carried over from another document. This does not help to instil confidence that sufficient attention to detail was paid when compiling the document.</p>	<p>The Conservation Area boundary when designated original was subjected to significant engagement. It was reviewed in 2016 and was considered fit for purpose with no amendment proposed. Llanrhian Community Council was consulted on 26/10/2016 and no adverse comments were received. No change proposed.</p> <p>Text error in paragraph 83 to be removed.</p> <p>See Appendix C for edit.</p>
21.	4704 / Paul Niedzwiedzki	<p><u>Permitted development</u></p> <p>The new document states that some changes to buildings in the CA will be "not appropriate" e.g. the use of concrete or clay tiles as roof coverings, the installation of solar panels on the principal elevations of buildings or in prominent locations. However, it is unclear whether this is advisory or mandatory. Other changes in CAs (e.g. replacement of windows or doors) require planning permission. The new document should make clearer which changes would be permitted developments and which would require planning permission.</p>	<p>Replication of (evolving) legislation and government policy on permitted development rights is not considered appropriate or necessary within the document. If an Article 4(2) Direction is proposed with Trefin Conservation Area it will be subject to full public consultation with clear guidance as to which minor works would require planning permission. In the interim, advice to the public is easily available via the Government Planning Portal or the Authority's pre-application service.</p> <p>No change proposed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
22.	4704 / Paul Niedzwiedzki	<p><u>Resources</u> The 2011 document had a section entitled “Resources” setting out the possibility of funding for conservation works from CADW, PCNPA and other sources. There is no such section in the new document. Owners of CA properties are encouraged to make changes where necessary (e.g. “the removal of unsympathetic windows that are not original to the building is encouraged”) but there appears to be no incentive or resource to help them do so. Is there no longer any source of CADW or PCNPA funding for such purposes, even on a very modest scale?</p>	<p>The National Park Authority’s Conservation Area grant scheme (which helped 11 properties 2006-2012) ceased in 2013. Cadw has limited funding for which property owners may apply directly.</p> <p>No change proposed.</p>
23.	4704 / Paul Niedzwiedzki	<p><u>Public realm</u> Both the old and new documents comment on the intrusive poles and overhead wires in the centre of the village and North End. PCNPA has worked with utility companies in other areas to move wiring underground. It would be helpful if the new document reiterated the need for works such as this, and if it contained an explicit commitment to bring about such changes in the Trefin CA.</p>	<p>To make an explicit commitment without the consent of the relevant utility companies is premature. The Authority would however be pleased to work with the community in investigating the feasibility of an undergrounding scheme. An amendment is proposed to text in Paragraph 82 to reference successful partnership schemes elsewhere.</p> <p>See Appendix C for edit.</p>
24.	4704 / Paul Niedzwiedzki	<p><u>Action plan</u> The document contains no action plan for future work. The previous document went to the other extreme by making many commitments, although with little apparent follow up to any of them. The new document gives an opportunity for the PCNPA to make at least some realistic commitments to action in support of the Trefin CA, even if it is only a commitment to make a separate action plan with specified time limits. This could be over a shorter period than the lifespan of the CA, e.g. over three years, with a review at that point, followed by a revised action plan, and so on. Without some commitment to action, the document will always be more of a planner’s aide-memoire than a practical support to residents.</p>	<p>The document serves as an appraisal of the Conservation Area as well as a management plan setting out proposals that can enhance the character and appearance of the Conservation Area. It is intended to guide relevant parties, underpin potential grant initiatives and initiate action plans. The latter are best initiated by the community, either as a response to a pressing issue or as a wider desire to improve the amenity of the Conservation Area. This approach has been taken across all 14 Conservation Areas within the National Park and is felt to be more realistic in terms of resources and more appropriate in terms of meaningful engagement than drawing up a list of action points. No change to the document recommended.</p>
25.	4704 / Paul Niedzwiedzki	<p><u>New development within the CA</u> The points and principles set out in this section of the new document (paras 73 to 87) are welcomed, especially the</p>	<p>Comments noted. No change to the document recommended.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>requirement (in para 74) that proposed developments in areas adjacent to the CA should have care and consideration for their impact on the setting of the CA. This includes the requirement to continue the local scale, form and materials, and to consider the impact of new development on key views and vistas. This is an improvement on the present document.</p>	
26.	4704 / Paul Niedzwiedzki	<p><u>Conclusion</u> Although the new document is fuller and more useful than its predecessor in some respects, it is a disappointment in others. It has little to say about how improvements can be brought about, and makes little commitment to facilitate them. Furthermore, the lack of any active attempts to involve or consult the local community over the creation and content of the document send an unfortunate message. It is to be hoped that the PCNPA will in future recognise the need to improve their record in consulting meaningfully, rather than relying upon unannounced website postings.</p>	<p>Comments noted. See responses above to representations on Public Realm and Action Plans above.</p>
27.	4706 / Gwelliant Trefin Improvement	<p>Views expressed suggest that there is much within the document to be welcomed in the effort to retain and protect the unique and historic character of the village and its surroundings although it is deeply regretted that the Authority chose not to engage with local people in its development. It is believed that this omission has led to a sense of alienation from the process and the contents of the document and has resulted in a number of criticisms of the current document.</p> <p>The adverse comments made by community members fall into the following areas:-</p> <ol style="list-style-type: none"> 1. Public notification of the consultation was non-existent and the local community has only just become aware of it. 2. Whilst some aspects of the document are welcomed, many aspects of the contents leave much to be desired. 3. The document contains no information on potential sources of funding available to enable people to carry out works in compliance with the requirements stipulated within the document. 4. Whilst there are improvements to the 2011 Conservation Area document, a number of the actions arising from that 	<p>Comments noted. The document is a revision not a replacement of the former Supplementary Planning Guidance which was subject to extensive statutory and local consultation and in Trefin, community groups played a very active role in formulating the document. It is hoped that future engagement with the community will be more effectively targeted at addressing issues of concern via an action plan – which this document is not intended to supplant.</p> <p>Please see below for responses on comments.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		document have not been completed which give little confidence in the value of the present document to effect beneficial change.	
28.	4706 / Gwelliant Trefin Improvement	<p><u>Lack of notification of consultation</u></p> <p>Members of the local community have received no notification of the Authority's intention to review the original 2011 Trefin Conservation Area document or of the posting of the revised document in a remote corner of the PCNPA website. In contrast, there was considerable openness and public discussion before the 2011 TCA document was confirmed. This failure to notify and engage with the 'stakeholders' is particularly regrettable in the light of the importance attached to such activity in CADW's document 'Managing Conservation Areas' referenced in Appendix A Section 10 on page 43 of the TCA document. In addition, Section 6.5 of the Welsh Government's Planning Policy Wales – Technical Advice Note 24 - The Historic Environment states that "<i>By their very nature, conservation areas have multiple stakeholders and management arrangements should provide opportunities for participation and engagement in plan and decision making.</i>" Local residents are important stakeholders in this regard. Not surprisingly, the local community is currently highly sceptical with regard to the National Park's planning policies and regulations following the controversial decision by the Authority to grant planning permission for 11 new houses on land adjacent to Cefn Gallod in the village. This decision was contrary to the strongly expressed wishes and interests of local people and did not comply with the Authority's own policy as set out in the Local Development Plan. There is therefore considerable local concern regarding the Authority's planning system leading to suspicion that the Authority had no serious intention of opening the consultation to public scrutiny.</p> <p>Nonetheless, there is a strong desire to contribute constructively to the consultation. In light of the very short time that local people have had to consider the implications of this document, the Authority is urged to i). grant an extension of the closing date so that full consideration can be given by the Trefin community, and ii).</p>	<p>The approach to consulting on Supplementary Planning Guidance is set out in the Authority's Delivery Agreement for Local Development Plan 2. A similar approach was taken to that for consulting on Supplementary Planning Guidance for Local Development Plan 1. The approach proposed to be taken (in the Delivery Agreement) was also consulted upon.</p> <p>Public notices are placed in local papers.</p> <p>A press release is also published towards the end of the consultation period to highlight the consultation.</p> <p>The Authority also puts links through from the main consultation page of the website to where the documentation is located.</p> <p>The Authority also posts on Twitter and Facebook.</p> <p>The document is a revision not a replacement of the former Supplementary Planning Guidance, which was subject to extensive statutory and local consultation and in Trefin, community groups played a very active role in formulating the document. It is hoped that future engagement with the community will be more effectively targeted at addressing issues of concern via an action plan which this document is not intended to supplant</p> <p>The Conservation Area boundary was reviewed in 2016 and was considered fit for purpose with no amendment proposed. Llanrhian Community Council was consulted on 26/10/2016 and no adverse comments were received. No change proposed.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		agree to a public meeting at which Park's staff will attend to explain and discuss the detail of the proposals.	Views on the recent planning application/decision regarding Trefin are noted but are outside the scope of this particular exercise. The proposal was fully debated at a recent Development Management Committee - 20/07/2022.
29.	4706 / Gwelliant Trefin Improvement	<p><u>The contents of the document</u></p> <p>The document appears to have been rather hastily put together with an element of cutting and pasting from other documents, e.g. Para. 83 refers to two cemeteries and a harbour, none of which are to be found in Trefin. Also the maps are almost illegible and of very limited value in trying to identify specific features and areas.</p> <p>The community has pride in the village and recognises the value of maintaining features of the built and natural environment that reflect the special nature, appearance and character of the local area. The measures within the document which seek to protect and enhance these features are therefore welcomed in general. However there are two principal concerns that arise that are not addressed by the document.</p> <p>Firstly, there is a risk that some elements of the regulations, in particular those relating to satellite dishes and solar panels that risk turning the village into an exhibit, frozen in time. The problem of satellite dishes may in time be overcome by the introduction of subterranean cabling, but the restrictions on the use of solar panels conflicts with Welsh Government policy to further sustainable energy provision and reduce greenhouse gases. This warrants further discussion.</p> <p>Secondly, the document concentrates on detail and fails to recognise or address the reality of the wider impacts of Man's activities on the area. There is a failure to recognise and address the real and very damaging changes that have occurred in the surrounding natural environment as a result of man's past and current activities. These activities include regular pollution from agriculture and the local Sewage Treatment Works, habitat destruction, loss of biodiversity, removal of hedgerows, field expansion, soil degradation and litter.</p> <p>Section 1.6 of the Welsh Government's <i>Planning Policy Wales – Technical Advice Note 24 - The Historic</i></p>	<p>Text error in paragraph 83 to be removed.</p> <p>See Appendix C for edit.</p> <p>The Authority will include high resolution maps on the website when published.</p> <p>In terms of satellite dishes, permitted development restrictions related to their siting apply across the whole of the National Park under the General Permitted Development Order (as revised).</p> <p>Subject to details as to fixing, solar panels are generally regarded as permitted development on unlisted dwelling houses across the National Park.</p> <p>With reference to wider issues such as pollution, soil degradation etc. the document and its legislative context embraces the historic environment where, for example, the poor condition of the land is in the context of derelict sites rather than issues relating to cultivation. Other legislation exists to address many of the wider issues raised, including the loss of hedgerows.</p> <p>No change to the document recommended.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>Environment states that “A properly protected, conserved and enhanced historic environment can improve the quality of life and well-being for everyone” and Section 1.7 defines the “historic environment” in policy terms as being ‘<i>All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed.</i>’</p> <p>Paragraph 86 of the TCA document states that “The National Park Authority has existing planning powers to remedy such matters as the poor condition of land.....”, but there is no evidence within the document that the Authority has any intention of using such powers to combat the environmental damage that is occurring locally and this is seen as a missed opportunity. It is recognised with gratitude the environmental improvement initiative that the Authority has recently commenced locally on its own land at Trwyn Llwyd and Grapley End Fields and the willingness it has shown in engaging with the local community in a practical way in the management work. It is hoped that this will be a template for further co-operative ventures between the community and the Authority in the future</p>	
30.	4706 / Gwelliant Trefin Improvement	<p><u>Sources of funding to assist with compliance</u></p> <p>Desirable though regulations may be to protect and restore the character and period features of the built environment within the TCA, implementation comes at a cost and imposes a significant financial burden on local residents. Whilst the 2011 TCA referenced potential sources of funding to assist with this, the current document fails to do so, thereby creating concern and potential opposition to the proposals. This needs to be remedied.</p>	<p>The National Park Authority is always happy to advise on funding available for conservation related work, which is best done on a reactive basis, given the temporal nature of grants and initiatives. No change to the document recommended.</p>
31.	4706 / Gwelliant Trefin Improvement	<p><u>Doubts about the document as a stimulus for change</u></p> <p>It would be hoped and expected that the principle aim of the document would be to provide a vehicle for improvement in the present and future well-being of the Trefin community. Indeed the Well-being of Future Generations (Wales) Act 2015 places a</p>	<p>The document is a revision not a replacement of the former Supplementary Planning Guidance, which was subject to extensive statutory and local consultation and in Trefin, community groups played a very active role in formulating the document. It is hoped that future engagement with the community will</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>legal responsibility on the PCNPA to do just that. This current document rightly seeks to impose a great many restrictions on individuals and businesses in order to maintain the status quo in terms of protecting the heritage and character of the village but appears to contain nothing to provide for the present or future needs and aspirations of the community.</p> <p>There is also little confidence that the document will be anything other than a static prescription as to how things have to be as a number of actions, commitments and proposals enshrined within the 2011 TCA were never followed through thereby not providing the changes and improvements envisaged. In particular, a commitment in the earlier document that a review of the Conservation Area boundary with the possible inclusion of additional areas would be carried out was never actioned and this now needs to be addressed. Although it highlights some areas where positive action would be beneficial the present document does not contain any action plan of proposals or commitments which is regrettable and a telling omission.</p> <p>Doubts have been cast on the value and integrity of PCNPA documents following the decision by the Planning Department to ignore the provisions of the Local Development Plan when deciding on the Cefn Gallod housing development recently. The logic of imposing rigorous restrictions on development and repair on some parts of the village whilst allowing the construction of unsuitable contemporary development elsewhere in the village is hard to fathom for many. It is also not understood locally why some valuable green areas within the village, such as the field adjacent to Cefn Gallod, were omitted from the 2011 TCA .</p>	<p>be more effectively targeted at addressing issues of concern via an action plan which this document is not intended to supplant.</p> <p>The Conservation Area boundary as designated in 1997 and contained within the 2011 document was subject to detailed public consultation.</p> <p>The Conservation Area boundary was reviewed in 2016 and was considered fit for purpose with no amendment proposed. Llanrhian Community Council was consulted on 26/10/2016 and no adverse comments were received. No change proposed.</p> <p>Views on the recent planning application/decision regarding Trefin are noted but are outside the scope of this particular exercise. The proposal was fully debated at a recent Development Management Committee - 20/07/2022.</p>
32.	4706 / Gwelliant Trefin Improvement	<p>GTI trusts that these initial views expressed will be given full consideration by the Authority and that a). the local community will be given an opportunity to meet with Authority representatives in the near future to discuss the issues identified and establish a sense of engagement with the proposals, and b). an extension of the deadline for comment is extended to enable the community to submit a more enlightened response.</p>	<p>Given the status of the document as outlined in responses above whereby no new proposals are made, it is considered that further engagement is best addressed via a community-led initiative to address areas of concern which relate to the heritage of Trefin.</p>

Trefin and Porthgain Conservation Areas

Rep No.	Reference	Representation	Officer Response and Recommendation
33.	2894 / Llanrhian Community Council	<p>Having reviewed the document you refer to below the information about which Conservation Areas were being consulted on is at the bottom of the page and I wonder if it would not be possible to make it clearer what the individual SPG documents are about particularly if there is specific consultation (as in this case) rather than general consultation (which is far more usual). Whilst the LDP2 is obviously very important to the Park, at the level of planning knowledge and focus that Community Councillors generally have documents such as SPG are often regarded as routine and probably not given the due consideration they deserve. A more user friendly and interesting presentation of the items under consultation might attract more attention and inspire more response. I am sure my Council is not alone in assessing the importance of documents for the Council agenda and eye-catching headings would make it very clear that the document needs attention. I wonder how many of your community councils respond routinely to SPG consultation?</p>	<p>In terms of the initial notification through email and or by letter what is being consulted on is highlighted quite well. This should be sufficient to help direct the reader. It is also highlighted at the top of the landing page for the supplementary planning guidance consultation page which should help.</p> <p>In terms of the website itself going forward this is something we can look at to see if more can be done in the next consultation.</p> <p>Time is spent formatting the documents themselves; covering emails, notices, comments forms etc. to ensure the focus of the consultation is highlighted.</p> <p>To note we also offered more time to comment if that was needed to the respondents.</p>
34.	2894 / Llanrhian Community Council	<p><u>General Comments</u></p> <ol style="list-style-type: none"> 1. Both plans have inconsistencies and errors 2. There is a disappointing lack of attention to detail which leads to a lack of confidence in the information supplied 3. The maps are illegible. 	<p>Please see responses below for points 1 and 2.</p> <p>3. The Authority will include high resolution maps for the Conservation Areas on the website.</p>
Trefin Conservation Area			
35.	2894 / Llanrhian Community Council	<p>Please use the reference numbers from the document to refer:</p> <p>50 – dormer windows – the constraints are inconsistent with the recent approval given to Cefn Gallod which is adjacent to the CA. 52 – PV panels – consideration as to climate change and renewal energy needs. Shouldn't be a standardised response.</p> <p>74 – the Cefn Gallod development is adjacent to the CA and is at odds with the principles of development within the CA.</p>	<p>Comment noted.</p> <p>Solar panels are permitted development for unlisted dwelling houses (subject to fixing) and there is an increasing range of heritage-related products whereby careful consideration is warranted. It is proposed to amend paragraph 53 to include these issues. This will result in consequential changes to the equivalent paragraph in all other Conservation Area documents.</p> <p>See Appendix C for edit.</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>81 – there is no Town Council. 83 – there are no cemeteries or a harbour – once again extremely poor research and lack of local knowledge. 87 – what evidence can the Park provide on their claim that they survey every 3 years to ensure the effectiveness of the plan.</p>	<p>Consequential Changes to paragraph relating to solar panels in all Conservation Area Documents because of this representation:</p> <p>Angle – Paragraph 60 Caerfarchell – Paragraph 48 Caldey – Paragraph 72 Little Haven – Paragraph 49 Manorbier – Paragraph 84 Newport – Paragraph 96 Portclew – Paragraph 43 Porthgain – Paragraph 52 Saundersfoot – paragraph 60 Solva – Paragraph 83 St Davids – Paragraph 91 Tenby – Paragraph 111</p> <p>Views on the recent planning application/decision regarding Trefin are noted but are outside the scope of this particular exercise. The proposal was fully debated at a recent Development Management Committee- 20/07/2022.</p> <p>Reference to Town Council removed.</p> <p>Reference to cemeteries and harbour removed. See Appendix C for edits.</p> <p>The Conservation Areas are surveyed in-house every three years, with five Conservation Areas now having Article 4 Directions addressing the loss of detail via permitted development rights.</p>
Porthgain Conservation Area			
36.	2894 / Llanrhian Community Council	<p>Please use the reference numbers from the document to refer:</p> <p>73 – does not take in account impact of tourism and parking on the local community. 81 – there is no Town Council. 82 – the public realm is incredibly light and takes no account of Porthgain as a tourist destination. 83 – there are no public gardens or cemeteries in Porthgain – how could this not be researched properly? 87 – what evidence can the Park provide on their claim that they survey every 3 years to ensure the effectiveness of the plan.</p>	<p>Paragraph to be amended to refer to seasonal congestion.</p> <p>Reference to Town Council removed. Comment noted. No change proposed.</p> <p>Reference to public gardens and cemeteries removed. See Appendix C for edits.</p> <p>The Conservation Areas are surveyed in-house every three years,</p>

Rep No.	Reference	Representation	Officer Response and Recommendation
		<p>The management plan does not include the considerable impact of tourism on local families.</p> <p>As can be seen from the comments above the Community Council was very disappointed in the inconsistencies and lack of local knowledge by the staff who produced these plans and is interested to learn how park intends to engage more effectively with the local community on such consultations. We would appreciate your comments.</p>	<p>with five Conservation Areas now having Article 4 Directions addressing the loss of detail via permitted development rights.</p> <p>The document is a revision not a replacement of the former Supplementary Planning Guidance, which was subject to extensive statutory and local consultation and in Porthgain, community groups played a very active role in formulating the document. It is hoped that future engagement with the community will be more effectively targeted at addressing issues of concern via an action plan which this document is not intended to supplant.</p> <p>The Conservation Area boundary as designated in 1997 and contained within the 2011 document was subject to detailed public consultation.</p> <p>The Conservation Area boundary was reviewed in 2017 and was considered fit for purpose with no amendment proposed. Llanrhian Community Council was consulted on the revision and no adverse comments were received. No change proposed.</p>

Full response from Coed Cymru / The Woodland Trust

Coed Cadw - the Woodland Trust works at national level to seek to create a favourable policy environment for the retention and expansion of tree cover in Wales.

We endeavour to assess planning threats to [ancient trees](#) and [ancient woods](#) on a UK wide basis, however we do not have capacity to engage in the local planning system across Wales. Please send any information on such threats to campaigning@woodlandtrust.org.uk.

We expect all local authorities and public bodies to do their utmost to protect and sustain all ancient trees and ancient woodland and we may challenge those who fail to do this.

More guidance and information on how you can help is on our website: <https://www.woodlandtrust.org.uk/about-us/woodland-protection/threats-from-human-impact/>

Advice to local authorities on planning impacts on biodiversity, including trees and woodland is provided by Natural Resources Wales. The services they provide are described on their website <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/?lang=en> and they provide [regional contact details](#).

Our advice to local authorities and all owners of public land is that they should be fully aware that the premature removal of any mature tree or shrub may adversely affect the health and welfare of residents, and cause biodiversity loss and environmental degradation. This cannot be fully or quickly mitigated by new planting.

We urge local authorities to invest for the long term to ensure healthy and attractive tree cover for all their communities, creating and sustaining a minimum 20% tree canopy cover in all urban areas. We suggest this requires a three stage plan: first fully assess their tree assets by commissioning [l-tree assessments](#); secondly, develop an integrated Tree and Woodland Strategy as [Wrexham CBC](#) has done; and thirdly, collect and manage resources and partnerships to deliver their tree strategy.

Some local authorities in Wales have started on this journey and we suggest all authorities review and adjust their priorities to ensure they meet the requirement for green infrastructure assessments in [Planning Policy Wales 10](#) and [Future Wales: The National Plan 2040](#) and to ensure that green infrastructure provision and management is fully embedded into their Health and Wellbeing Plans, air pollution mitigation strategies and climate emergency responses. An essential component of this will be to support suitably qualified and experienced Tree and Woodland Officers.

One area to consider may be active travel plans

1. Coed Cadw - The Woodland Trust very much supports the intention behind active travel provision and the Welsh Government's new Llwybr Newydd transport policy. We are excited

by the opportunity to enhance active travel routes through co-design with green infrastructure provision and tree and woodland protection and planting, for example, as set out in Planning Policy Wales 11, Chapter 6. *“6.2.5 The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design”*

2. This accords with one of our asks in our [Coed Cadw Manifesto](#) *“Increase tree cover along roads and walking and cycling routes to make them more attractive, safer and healthier and better for wildlife.”*
3. We suggest the Active Travel Guidance needs to be seen to be thoroughly cross-referenced with other policy priorities including:-
 - the Environment (Wales) Act duty on public authorities to maintain and enhance biodiversity, and
 - the requirements for the enhancement of green infrastructure networks, as set out in PPW11 and “Future Wales – the National Plan”, including the protection of mature street trees and native habitats, and
 - identifying opportunities for additional tree planting as set out in the Welsh Government’s Net Zero Wales Plan
4. Where routes intersect with our land, we would expect the local authority or their agents to take the initiative to contact us directly and asked for our views and consent. There is a searchable database of accessible woodland on our website: [Woods - Visiting Woods - Woodland Trust](#) This includes all woods open to public access, not just Woodland Trust owned sites.
5. Our expectation is that potential routes are screened against the [Ancient Woodland Inventory](#) and the [Ancient Tree Inventory](#) at an early stage and potentially damaging routes are excluded from further consideration. It is not clear what process there is to ensure this, as habitat impact assessment procedures are not included in the Active Travel Act guidance.
6. We would expect an environmental assessment to consider potential impacts both from the construction and subsequent use of the route, in particular any impact on ancient woodlands or ancient trees. the loss of mature street trees, fragmentation and disturbance of native habitats, and the introduction of street lighting into areas of native habitat.
7. We suggest it would be useful to establish and highlight some over-arching principles, for example:-
 - That active travel networks are co-designed with green infrastructure networks and nature recovery networks.
 - That hard-surfaced active travel tracks are not routed through sensitive and irreplaceable habitats including ancient woodland.
 - That route selection and design processes ensures that routes retain wildlife habitat and street-side green infrastructure and enhance existing road space with new planting.
 - That opportunities are sought to work with communities to identify sites along active travel routes for additional tree and shrub planting and carry out that planting.

- That appropriate ecological expertise is available in teams responsible for the delivery of Active Travel Plans.

Opportunities for other significant new initiatives may emerge from the current thinking on a new National Forest for Wales.

Cumulative Impacts of Wind Turbines

Paragraph 2.14: that is no significant adverse cumulative change to its purposes, special qualities and sensitive characteristics from wind turbine developments. The threshold for acceptable change in these areas is likely to be low.

That there is no unacceptable adverse cumulative impact on the surrounding landscape, particularly the setting of the National Park(s) and AONB. Unacceptable impact here is taken to mean where wind turbines significantly⁴ adversely affect the purposes or special qualities of the designated areas and / or become a dominant or key characteristic of a landscape, depending on its sensitivity which shall be determined by the assessment.

⁴ numerous adverse effects that fall below the Environmental Impact Assessment threshold of significance, can conflict with the purposes of a national designated landscape and undermine the special qualities.

Table 4:

Table 4: Recommended areas for cumulative assessment of onshore wind farms search and study

Proposed Turbine/s height to blade tip (m)	Scoping search area/ broad study area (km radius)	Detailed study area (km radius)
<25	5-8km <u>5km</u>	1.4km <u>2.5km</u>
26 to 49	15km	7.5km
50 to 79	20km	10km
80 to 108	25km	10-15km <u>12.5km</u>
109 to 145	35km <u>30km</u>	15km
146 to 175	40km	20km*
175 to 225	50km	25km*
225 to 300	60-70km <u>60km</u>	35km*

Safeguarding Minerals Zones

Paragraph 2.1: The Welsh Government requires that minerals are safeguarded against unnecessary sterilisation by permanent development. In some cases prior extraction of the mineral can allow the development to take place. In other cases a different site should be sought for the development. ~~Exceptionally the application can be refused.~~

Prior Extraction Table:

Is the resource ~~limestone and within 200 metres of existing~~ the buffer zone of sensitive development?

Planning Application within a Minerals safeguarding Area:

Is the resource ~~limestone and within 200 metres of existing~~ the buffer zone of sensitive development? ⁹

Conservation Areas:

Angle

Paragraph 60: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Caerfarchell

Paragraph 48: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Caldey

Paragraph 72: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Little Haven

Paragraph 49: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Manorbier

Paragraph 84: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Newport

Paragraph 14: Whether the Hen-gastell site at the foot of Long Street / Lower St Mary's Street was the original castle site is in doubt – more likely the existing castle is the original site, or possibly it existed closer to the Parrog. Cadw considers that the site is that of the first castle, prior to the migration of the settlement southwards.

Paragraph 96: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Portclew

Paragraph 43: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations

at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Porthgain

Paragraph 52: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Saundersfoot

Paragraph 60: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Solva

Paragraph 83: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

St Davids

Paragraph 91: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations

at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.

Tenby

- Paragraph 37: -Poor quality pavements to some streets; and deteriorating finger-posts
-Loss of trees (replacements needing to be suitably small species)
-Lack of public access to town walls
- Figure 15: Title to be added - St. Stephens, The Croft
- Figure 16: Title to be added - Norton House
- Paragraph 44: Weed damage to curtilage stone walls
- Paragraph 47: The character of the area mainly comprises terraced housing. Showing a distinct hierarchy from the tall sea-facing Esplanade (mostly hotels), the three-storey terraces of the streets behind, the lesser terraces of Picton Road and Culver Park, and the cottages along Trafalgar Road. Queen's Parade is a cohesive well-preserved terrace of c. 1900.
- Paragraph 49: In terms of key views, the large Victorian terraces form a telling contrast to the medieval streetscape of the walled town when viewed from the sea. There is a fine coastal vista from Battery gardens over the coast and Ritec Valley. Individual and small groups of trees are important, including those at Egypt House and around the War Memorial and screening the multi-storey car park.
- Paragraph 51: Weed damage to curtilage stone walls
- Paragraph 57: Weed damage to curtilage stone walls
- Paragraph 64: The area is bisected by the steep tree-lined Slippery Back (vehicular up to the cemetery gates) which was the ancient route into town from the north, and by Blind's Lane recently upgraded footpath.
- Paragraph 108: Where original dormers exist, any changes to the proportions and overall size should also be avoided: full width dormers should usually be avoided.
- Paragraph 111: Notwithstanding prevailing householder permitted development rights, ~~the installation of panels~~ microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall

surface. Solar slates along with an increasing number of 'heritage range' products are available.

Paragraph 134: Good quality, contemporary designs may be appropriate in the Conservation Area, but ~~the~~ care must be taken to avoid incongruous and low grade, brash and ostentatious development.

Map 4: Text amendment villa to village (see map below).

Tenby

Outlying areas important to the setting and character of the Conservation Area



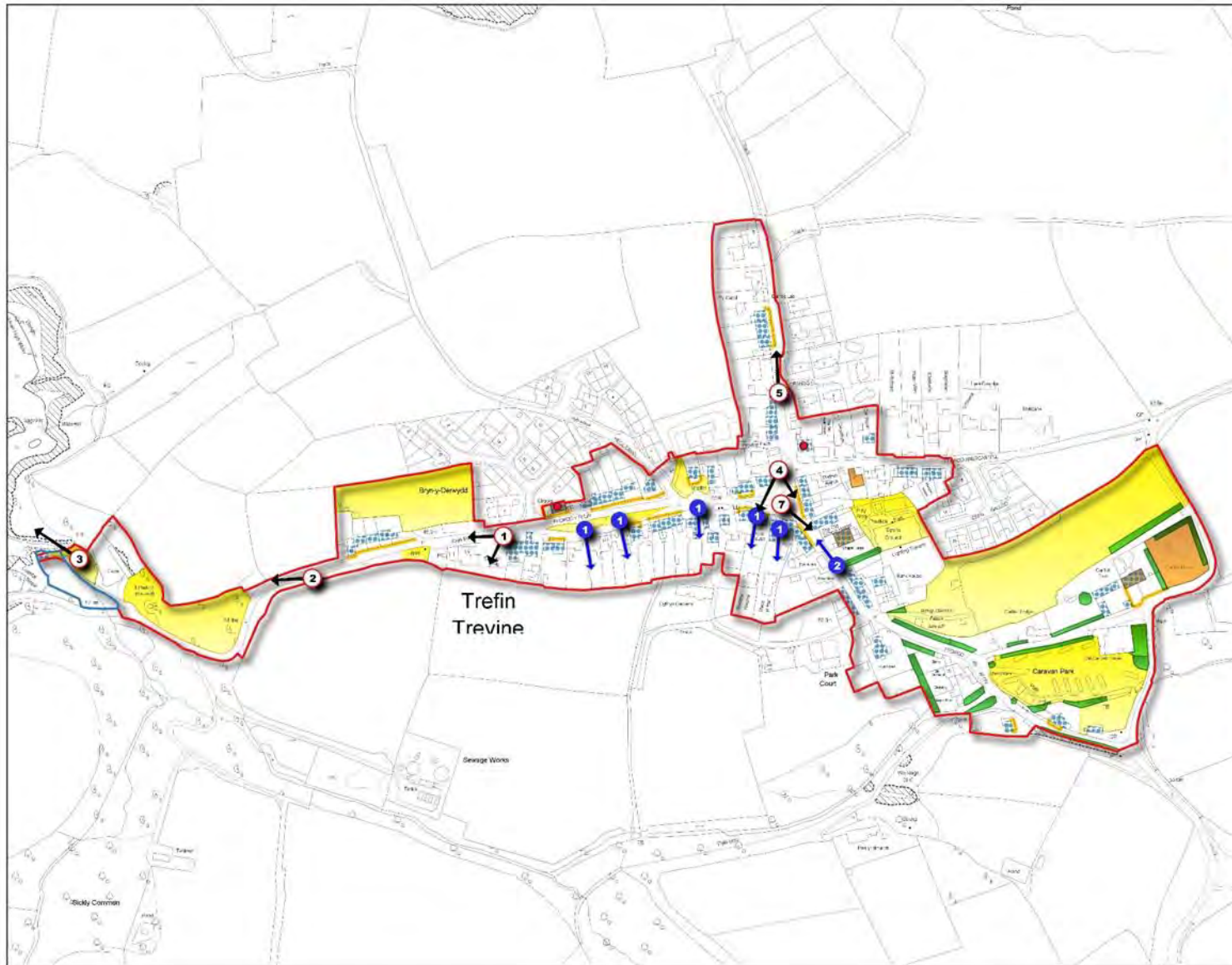
Tenby Conservation Area
Designated 1971; amended 1995
Conservation Area extension - March 2019
MAP 4

- A. Scrub-covered sand dunes form backdrop to fine setting of South Beach and the townscape itself when viewed from the west. Of high ecological value. Golf links form pleasant semi-rural setting to townscape; part of important early C19 land reclamation scheme. Sheer cliffs of Giltar Point close vista of South Beach.
- B. Ritec Valley and marshes of ecological value and important to setting of townscape when viewed from the west. Historically important as former navigable route inland.
- C. Penalum and environs forms good semi-rural sloping backdrop to south-west, a typical seaside village studded with trees, large villas and cottages.

Trefin

- Paragraph 53: Notwithstanding prevailing householder permitted development rights, the installation of panels microgeneration equipment will not be appropriate on the principal elevations of buildings or in prominent locations within Conservation Areas will require careful consideration. Alternative locations at the rear of buildings, on subsidiary outbuildings or ground-mounted where the panels would not be visible from the highway, should be considered. They should not project more than 200mm from the roof or wall surface. Solar slates along with an increasing number of 'heritage range' products are available.
- Paragraph 73: Where possible, minimise the visual impact of parked cars (including seasonal congestion) and the provision of parking areas on the streetscape of historic streets and buildings.
- Paragraph 81: These are very important determinants of design excellence and sensitivity in historic areas. The Highway Authority is encouraged to continue to work with the NPA and ~~Town~~ Community Council to maximise the considered use of design standards, to be flexible where appropriate and to use the most appropriate materials and finishes where financial resources permit.
- Paragraph 82: While the conservation and enhancement of private properties within the Conservation Area are important, public areas and features (poles, cables, signage, benches, bins, lighting etc.) have significant effects on the special qualities of the area. In working with the relevant agencies, attention will be drawn to the special qualities of the Conservation Area in the provision of appropriate infrastructure. The Authority has successfully worked with utility companies to underground cabling in and around a number of Conservation Areas.
- Paragraph 83: Several areas are highlighted as such within the appraisal, such areas including small private and public gardens spaces, ~~the old and new cemeteries and the harbour area.~~
- Map changes: Conservation Area Map (page 3): Green shaded area in the key relating to 'Opportunities for improvement of forecourts / curtilage / shopfronts' removed.
Green hatched area in the key relating to 'Opportunities for enhancement' removed (see map below).
- Map 3 – Outlying areas important to the setting and character of the Conservation Area – Cefn Gallod and the triangulat piece of land to the east of Cefn Gallod included in outlying areas (see map below).

Trefin Conservation Area Designated 1997



Key

- Conservation Area / Character Areas
- Listed Buildings
- Tree Preservation Order/ Trees important to setting
- Scheduled Ancient Monuments
- Site of Special Scientific Interest
- Special Area of Conservation
- Landmark Buildings
- Positive Buildings
- Key curtilages/frontages
- Essential Open Areas
- Opportunity for public realm/ features enhancement

Key views

1. View from Ship Inn towards farmland and coastline
2. View from Ffordd y Felin towards farmland and headlands
3. Views of rocky headland and Aberfein Mill
4. Views of Carreg-y-groes down Ffordd yr Afon and Ffordd y Felin
5. Views from North End towards coast
6. View from west showing village set on prominent slope
7. View of The Cwm and rooftops of Ffordd y Felin
8. Views across conservation area with coast as backdrop
9. Views from Penparc and Llanon

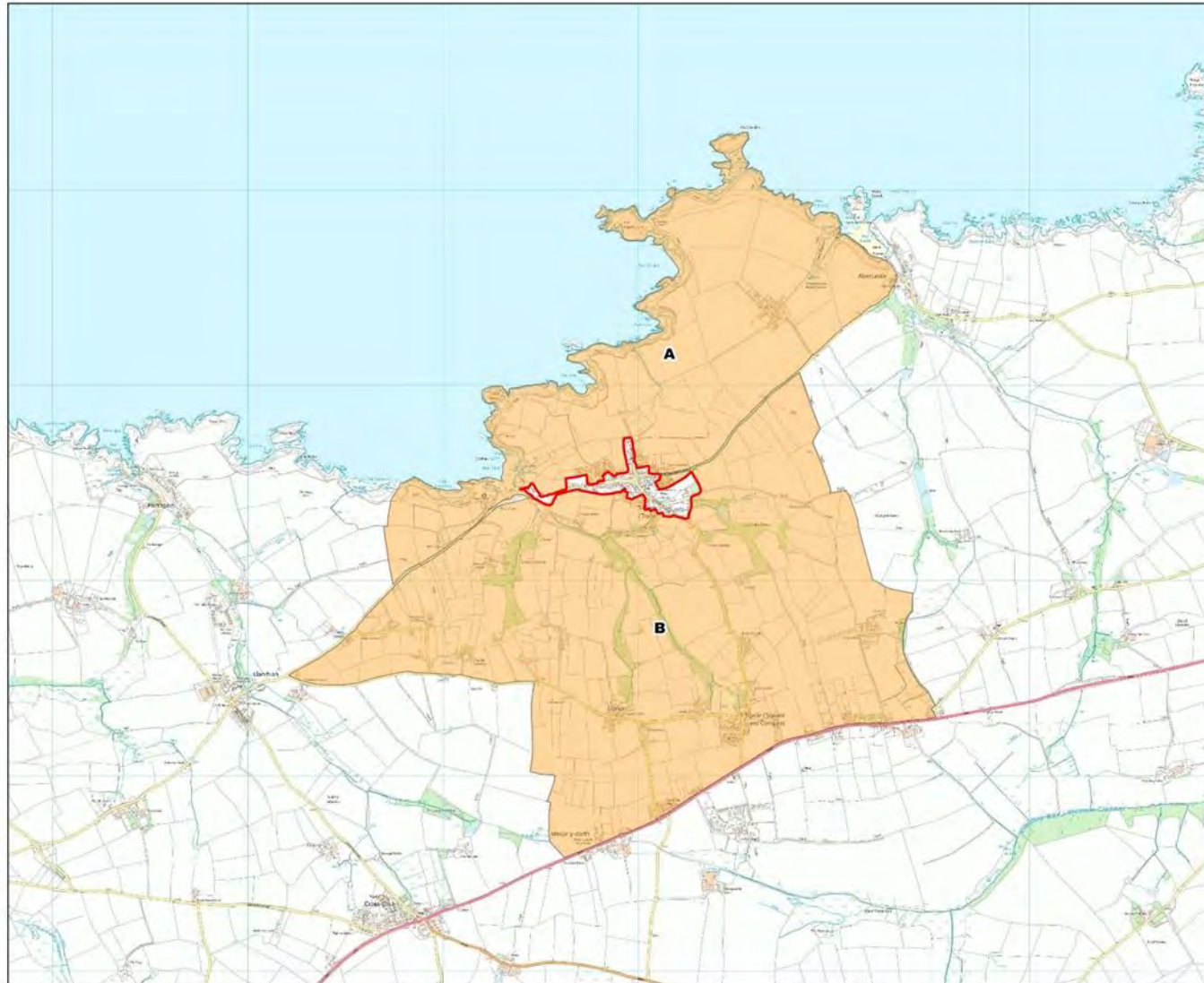
Glimpses to an object/landmark/point of interest

1. Glimpse south over farmland between houses along Ffordd y Felin
2. Glimpse up Ffordd yr Afon towards Carreg y groes



Trefin

Outlying areas important to the setting and character of the Conservation Area



Trefin Conservation Area Designated 1977 MAP 3

- A. Land to the north of Llanrhian - Abercastle road including Aberfelin, former quarries at Trwn Llwyd, Longhouse Farm and Carreg Sampson Burial Chamber.
- B. Land to the south of Llanrhian - Abercastle road including surviving medieval strip fields and ancient trackways. Prominently visible landscape dotted with farms and houses; A487 forms horizon.