

**REPORT OF THE PLANNING OFFICER (PARK DIRECTION)  
&  
HEAD OF PARK DIRECTION**

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**SUBJECT: SUPPLEMENTARY PLANNING GUIDANCE DOCUMENTS  
(a) ACCESSIBILITY  
(b) LOW IMPACT DEVELOPMENT MAKING A POSITIVE CONTRIBUTION  
(ONE PLANET DEVELOPMENT)**

**Purpose of the report**

To advise Members of the responses received on the above public consultations and to recommend to Members to adopt both guidance documents for development management purposes.

**Background**

The Accessibility Supplementary Planning Guidance was approved for public consultation by the National Park Authority on 13<sup>th</sup> June 2012. The consultation began in July 2012 and closed on 19<sup>th</sup> October 2012. A Workshop for Members was held on 20<sup>th</sup> February 2013.

The Low Impact Development Supplementary Planning Guidance was approved for public consultation by the National Park Authority on 12<sup>th</sup> December 2012. The consultation on this document began February 2013 and ended on the 3<sup>rd</sup> May 2013.

In both cases letters were sent to various consultees. These included Agents, Architects, Town and Community Councils within the Park, Housing Associations, Estate Agents, Developers, Local Community Groups, local AM's and MP's, County Councillors, Utilities, Chambers of Trade, Environmental Groups, Government agencies, and other people who had expressed an interest.

Letters and CD copies of the consultation documents were provided to libraries within Pembrokeshire, St Clears and Cardigan. They were also available at the National Park centres in Newport, St David's and Tenby in this format. Paper copies of the documents were available to view at the National Park Offices in Llanion Park, Pembroke Dock.

The consultation was advertised via the Authority's web site and via public notices in the Western Telegraph which appeared in the 25<sup>th</sup> July 2012 and 6<sup>th</sup> February 2013 editions, respectively.

## **Report of Consultations**

### **a) Accessibility**

A total of 6 people/organisations responded to this consultation, including 2 Community Councils. One of the organisations had no comment to make. The responses are shown in The Report of Consultations (Appendix 1 to this report), along with an Officer response and recommendation to each of the individual comments. As a result of the consultation it is recommended that potential for a web map to accompany this supplementary planning guidance be explored. No other changes are proposed.

Members will be aware of two recent planning appeals in which Inspectors supported the Park's planning policy on accessibility and dismissed appeals on the grounds of sites lacking a variety of modes of transport except the private car. r.

### **b) Low Impact Development making a Positive Contribution (One Planet Development)**

Technical Advice Note (TAN) 6 makes it clear that One Planet Development takes forward Low Impact Development principles in the Welsh context. In this Supplementary Planning Guidance reference is made to One Planet Development as that is the term now used in national planning guidance when referring to Low Impact Development.

There were two responses to the consultation. The Coal Authority responded but offered no comments. Natural Resources Wales made a detailed response. Suggested responses are given to their comments, paragraph by paragraph, in the Appendix 2 to this report.

As a result of the consultation some minor amendments are proposed to the guidance.

## **Conclusion**

As a result of this exercise, there are minor changes recommended to both Supplementary Planning Guidance documents. Subject to approval by Members, these documents will be adopted and used in conjunction with the Pembrokeshire Coast National Park Local Development Plan Adopted September 2010 when considering planning applications within the National Park.

## **RECOMMENDATION**

- 1. That the Officer Response set out in Appendix 1 and 2 be agreed as the National Park Authority response to these consultations.**
- 2. That (a) Accessibility and (b) Low Impact Development Making a Positive Contribution (One Planet Development) Supplementary Planning Guidance to the Pembrokeshire Coast National Park Local Development Plan be adopted for development management purposes.**

Background papers:

Committee Report and Draft Supplementary Planning Guidance on Accessibility & Low Impact Development Making a Positive Contribution December 2012

[Pembrokeshire Coast National Park - Committee Papers](#)

Planning Policy Wales:

<http://wales.gov.uk/topics/planning/policy/ppw/;jsessionid=959D17CBE44B4C21C123285AA5AE6E99?lang=en>

Technical Advice Notes

[Welsh Government | Technical Advice Note 6 – Planning for Sustainable Rural Communities \(2010\)](#)

[Welsh Government | Technical Advice Note \(TAN\) 18: Transport \(2007\)](#)

One Planet Developments National Guidance

[Welsh Government | One Planet Development Practice Guide](#)

Local Development Plan (Adopted 2010)

<http://www.pembrokeshirecoast.org.uk/default.asp?PID=178>

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*Consultees: Jane Gibson, Director of Park Direction and Planning ; Tegryn Jones, Chief Executive*

## Appendix 1 - Draft Supplementary Planning Guidance – Accessibility - Comments

Ref	Comment	Officer Response
<p>Acc 2911/1 St Dogmael's Community Council</p>	<p>The Community Council feels, very strongly, that the proposals are too restrictive for a predominantly rural area with limited service provision.</p> <p>The Council notes that whilst the statutory purpose of the PCNP Authority is 'To conserve and enhance the natural wildlife and cultural heritage of the national park and to promote opportunities for public enjoyment and understanding of its special qualities' it also has a statutory duty, whilst pursuing the above objectives to 'foster the economic and social wellbeing of communities in the Park'.</p> <p>In addition, the settlement strategy of the JUDP recognizes that 'Pembrokeshire is predominantly rural in nature and some development in the more remote areas of the County is considered appropriate for socioeconomic reasons. This is to ensure a social and economic future for the more remote rural settlements and communities and in some cases specifically to contribute to the safeguarding of the linguistic character of the area.'</p> <p>It would seem that the proposals in the SPG are in contravention of both of the above due to their draconian nature (notwithstanding the exceptions details).</p>	<p>National Planning Policy requires planning authorities to reduce the need to travel especially by car. Through the planning system this is done by concentrating development in places which are most accessible by means other than cars. It includes walking and cycling. Policy 7 of the Local Development Plan advises that when development is located in the countryside, accessibility to Centres is an important consideration. This SPG is a means of defining how we will consider it. It inevitably involves distances – otherwise it would not be an issue. The distances need to be realistic and reasonable. For this purpose Officers have used published data from expert and recognised bodies – such as The Institute of Highways and Transportation. It is further inevitable that some very remote areas of the National Park will lie beyond these distances from bus routes or Centres and are thus reliant solely on cars as a means to travel. Future proofing of development in these areas means that we shouldn't be increasing number of new properties in such locations.</p> <p>As set out in the draft SPG it is accepted that some developments will be needed – or permissible within these areas, such as affordable housing or for particular employment or rural enterprise worker needs. It is not considered to be overly restrictive nor draconian.</p> <p>No change is recommended.</p>
<p>Acc 2911/2 St Dogmael's Community Council</p>	<p>It is a well-accepted fact that public transport provision in smaller settlements is extremely limited and that use of a private vehicle for transport to work, school and other essential services is required.</p>	<p>It is agreed that cars are needed for day to day accessibility in parts of the National Park. In the interests of sustainability, the Welsh Government requires that</p>

Ref	Comment	Officer Response
	To severely limit or deny applications for local housing and businesses on the basis of access to public transport or use of walking/cycling routes is to cripple these smaller communities in the longer term, allowing no growth, other than affordable houses or houses based on agricultural/horticultural need./	the need to use cars is minimized. The policy position allows a range of developments over and above affordable and agricultural housing in these areas – such as tourism attraction and employment uses. No change is recommended.
Acc 2911/3 St Dogmael's Community Council	It is noted that in the Rural Enterprise dwelling monitoring Process Returns for April 2011 – March 2012 PCNP made no return, and in the same for 2010/11 showed only 2 applications in the category, one of which was refused, thus suggesting that development of this type does not contribute any considerable volume to overall applications in the Park.	Rural enterprise dwellings are specifically to house workers needing to live close to their place of work for operational purposes. Submissions of this type of applications are very few and far between. This type of development requires evidence to demonstrate that the person needs to live on or close to their place of work. The Draft Supplementary Planning Guidance explicitly lists such applications under the exceptions to this guidance.  No change is recommended.
Acc 2911/4 St Dogmael's Community Council	Whilst the Community Council fully supports the provision of affordable and agricultural/horticultural development based on need, it feels that these exceptions cannot fully meet the requirements of small communities. Agricultural/horticultural and affordable housing criteria are stringent and not all who wish to live, work and contribute in rural areas meet them.	Please see the responses to Acc 2911/1 and Acc 2911/2 above.  No change is recommended.
Acc 2911/5 St Dogmael's Community Council	The Council also felt that no account had been taken of the growing trend for people working from home and home based businesses (indeed, the benefit of this was highlighted in the Park's own Annual Improvement Report, Issued: January 2012, where purely based on Park staff being allowed the option of working from home where appropriate, average home to work travel per employee was reduced by approximately 10 per cent.	Planning permission is granted to land and buildings and only in very rare and particular circumstances is tied to the applicant. Ownerships and users change over time. Whilst an applicant may be able to work at home – a subsequent owner or user may have different requirements or preferences. It is acknowledged that internet connection can help to minimize travel overall and can be part of agreed travel plans. Technical Advice Note 18: Transport (para 9.13) advises that: <i>“The weight to be attached to a travel plan when determining a planning application will depend upon the extent to which it (or parts of it) can be secured</i>

Ref	Comment	Officer Response
		<p><i>through a planning condition or obligation and the extent to which it affects the acceptability of the development proposed. Development that is unacceptable should never be permitted because of the existence of a travel plan if the implementation of that plan cannot be enforced.”</i></p> <p>A condition to try to ensure people to have to work at home or use online shopping facilities would be overly onerous on both the user and the planning authority and thus unenforceable. It should also be noted that small scale business use from a dwelling in some circumstances does not require planning permission in any event.</p> <p>No change is recommended.</p>
Acc 2911/6 St Dogmael's Community Council	The Council is also concerned that where 'residential' development might not be allowed on the basis of accessibility 'holiday lettings' might well, on the basis that the travelling needs of the holiday makers different to those of permanent residents. What has not been taken into account, it seems is the travel miles and carbon impact of holidaymakers travelling to the site, which could well, over the letting term of the holiday accommodation, far exceed that of local residents' travel.	<p>The ways in which people travel to and around Pembrokeshire are outside the control of the planning authority. What we can assist with is ensuring that once here visitors have the option of getting about by means other than the car. Travel requirements of holiday-makers are less likely to be as time-dependent and frequent as those for permanent residents and therefore a lower threshold of bus service is feasible. It should also be noted that the holiday accommodation is acting as a local business and therefore supporting and diversifying economic activity in a rural area.</p> <p>No change is recommended.</p>
Acc 2911/7 St Dogmael's Community Council	The Community Council also feels it needs to be noted that small to medium sized service village/centres for rural areas need year-round business if they are to remain viable. In restricting development around such services village/centres to holiday homes, generally used for a very short season, the Parks Authority is potentially looking at an increase in use of service village/centres during a short holiday season with little or no extra footfall out of holiday season. Historically, whilst any increase in income is welcomed, many small to medium businesses find it hard to survive unless	This policy approach helps to ensure that small and medium size villages remain viable. Those Centres with facilities and services available have been designated as 'Centres' in the Local Development Plan. Many of the Centres have land allocated for residential and other developments and also have a boundary defining areas within which further development may

Ref	Comment	Officer Response
	<p>there is sufficient local support year round. If local businesses fail then the use of private transport in the more remote areas must increase by both local residents and holidaymakers in order to reach essential services.</p>	<p>be permitted. These developments are within walking distance of the services and facilities. Once people have to get into their cars to travel to services and facilities they are more likely not to use the local facilities but larger scale facilities in larger towns. This has been borne out by research reported in national press. The rising cost of petrol was cited as the reason for more people walking to the local shop rather than taking the car to the supermarket. (Express 27/02/2012; Guardian 20/10/2011).</p> <p>In addition, Policy 37 of the Local Development Plan also seeks to ensure that self-catering accommodation occurs only in appropriate brownfield or conversion locations and even so, the need for affordable housing could be prioritized. New build self-catering development on greenfield sites is not permitted.</p> <p>Holiday trends are indicating that more short breaks throughout the year are becoming the norm, Conditions on self catering developments ensure that occupation is no longer restricted to a 'holiday season'.</p> <p>No change is recommended.</p>
<p>Acc 2911/8 St Dogmael's Community Council</p>	<p>A structured and considered approach to allowing development of housing and businesses premises in rural areas is required, not one based on the number of bus journeys any settlement has in a 7-day period.</p>	<p>The strategy for development in the National Park is set out in the Local Development Plan and is founded on robust evidence which has been tested through an Examination of the Plan.</p> <p>This Supplementary Planning Guidance provides guidance on one element of a policy and not overall location of development. Of course other planning considerations come into play – visual impact, conversion of buildings, farm diversification etc</p>

Ref	Comment	Officer Response
Acc 2911/9 St Dogmael's Community Council	The Community Council would also have found it useful to see map indicating which settlements in the Park would be affected by the 1km proposal. It was felt that even some of the larger villages could well be impacted, particularly where there is a seasonal change in the frequency of services, with a reduction in winter months.	<p>No change is recommended.</p> <p>The feasibility of including a web based map on our website to accompany the supplementary planning guidance could usefully be explored which could give a general indication of the Centres and areas covered by public transport routes and the walking distances to them.</p> <p>It is proposed that potential for a web map to accompany this supplementary planning guidance be explored.</p>
Acc 1307/1 Martletwy Community Council	It is the view of the council that the proposal to limit residential development to sites located within a kilometre of bus routes that provide five services a day, five times a week will do little to further the Key Policy Objective of the Welsh Government to minimize the demand for travel, especially by private car. Further, so many variables affect the provision of rural bus services that this SPG would be an uncertain and unfair planning tool and should not be adopted.	<p>Bus services are affected by various issues, however timetables for bus services are generally set for 5-year periods. All planning policy is subject to review and change depending on circumstances and the Supplementary Planning Guidance can also be amended and updated should circumstances change dramatically.</p> <p>No change is recommended.</p>
Acc 1307/2 Martletwy Community Council	<p>The community council's comments centre on two areas of concern:</p> <p>1a The lifestyles of a high proportion of rural residents minimize the demand for travel, whether by car or public transport, making this SPG unnecessary.</p> <p>i) Farms and tourism providers work at home; they do not undertake a daily commute whether by car or bus;</p> <p>ii) Thanks to IT development, there are growing numbers of weekly commuters who work in the major conurbations for a few days a week, returning to their rural residence to work at home for a couple of days a week. Again, there is no daily commute whether by car or bus.</p> <p>iii) Development in IT point to growing numbers of people working from home. They would not use their cars on a daily basis and would not use a daily bus service.</p> <p>iv) Internet shopping is growing</p>	<p>Please see response to Acc 2911/5 above.</p> <p>No change is recommended.</p>



Ref	Comment	Officer Response
	<p>significantly every year, reducing the need for rural residents to use cars or buses for shopping.</p> <p>All these factors points to rural bus services potentially being used less, without private cars necessarily being used more. Lower demand for bus travel will make services more likely to be discontinued, having a negative and unjustifiable impact on residential planning applications.</p>	
<p>Acc 1307/3 Martletwy Community Council</p>	<p>1b The provision of regular bus services is not relevant to traditional rural jobs. Work in rural Pembrokeshire is generally in farming and tourism, neither of which follow a Monday to Friday 9am to 5pm routine. Working hours are determined by weather and season, often involving irregular, unsociable hours that cannot be serviced by bus timetables.</p>	<p>Please see response to Acc 2911/5 above.</p> <p>No change is recommended.</p>
<p>Acc 1307/4 Martletwy Community Council</p>	<p>1. So many variables affect the provision of rural bus services so it is impossible to forecast the long-term prospects of any single route. Such uncertainty would make this SPG an unfair planning tool if adopted. For example:</p> <p>i) Rural residents have no statutory right to minimum levels of bus service and neither local nor national government ring fence funding for the provision of bus services. Indeed, in this current financial year, the Welsh Government slashed Pembrokeshire County Council's Local Transport Services Grant by 27%. It also reduced the Bus Service Operators Grant by 25%. With the economic situation showing little sign of improvement, who can tell what cuts lie in the future, making all bus services uncertain.</p> <p>ii) A change in the status of homes along a route can have a significant impact on the sustainability of a bus service. A large house sold by a family in local employment to people intending to use it as a holiday home could effectively lose 10, 20 even 30 bus journeys a week and make a bus route less viable.</p> <p>iii) Closure or relocation of local employers could significantly change commuting habits and reduce use of bus routes.</p> <p>With so many variables influencing bus usage, one cannot assume that any single rural route has a</p>	<p>Please see response to Acc 1307/1 above.</p> <p>The majority of bus services in the County are subsidized by Pembrokeshire County Council (85%). It is the County Council and not the bus companies who determine the routes and frequencies of the services. None of the routes would be financially viable without the subsidy. The subsidy provides a means of transport for communities and particularly those without the benefit of a car (16.4% of the National Park population).</p> <p>No change is recommended.</p>

Ref	Comment	Officer Response
	guaranteed long term future. The people who decide whether or not a bus service runs are, ultimately the bus operators. It is unacceptable for bus operators to decide the future of planning applications.	
Acc 1307/5 Martletwy Community Council	Although there are a number of exclusions which significantly dilute the impact of this proposed guideline, the Martletwy Community Council believes that, if adopted, this SPG would add another layer of red tape to the planning process: it would deprive property owners of the ability to make long-term investment decisions and possibly even erode property values. The possible cost to individuals is not commensurate with the contribution it could make to minimize travel in PCNP.	It is not clear what these comments are based upon. The planning system is a system of control. As set out in Planning Policy Wales (Edition 5, paragraph 1.2.1) <i>“The planning system manages the development and use of land in the public interest, contributing to the achievement of sustainable development.”</i> And para 3.1.7 – <i>“The planning system does not exist to protect the <b>private interests</b> of one person against the activities of another. Proposals should be considered in terms of their effect on the amenity and existing use of land and building in the public interest.”</i>  No change is recommended.
Acc 4208/1 Mrs Maureen Prentice	In my view, this proposal should not be adopted because bus services are an inappropriate and irrelevant measure of accessibility in rural areas. This measure would do little to promote the Welsh Government’s key objective of reducing use of the private car. It will add another layer of red tape to the planning process, which is against central government’s declared objective of reducing the complexities of planning.	Accessibility is judged against all measures – walking, cycling, public transport and private cars. The Welsh Government objective is to minimize the need to travel by car and this approach is wholly consistent with that. The policy is in place. The Supplementary Planning Guidance is providing advice on how the policy is administered.  No change is recommended.
Acc 4208/2 Mrs Maureen Prentice	It is an unreasonable proposal could drive down land value in remote areas and deprive property owners of the right to make long-term investment plans.	Please see responses to Acc 1307/5 an Acc 4208/1, above.  No change is recommended.
Acc 4208/3 Mrs Maureen Prentice	One could argue that the rationale behind it is outdated and ignores social and technological change. Indeed, the health of a rural economy could increasingly be measured positively by lack of bus services rather than frequency.	The view of the Representor is noted  No change is recommended.
Acc 4208/4 Mrs Maureen Prentice	Farmers and tourism providers work from home – they do not undertake a daily commute by either car or bus.	Please see response to Acc 2911/5 above.  No change is recommended.

Ref	Comment	Officer Response
	<p>Artists, craftsmen and specialist food producers also work from home, without a daily commute by either car or bus. IT developments are making it increasingly viable for such people to not only produce at home, but sell via the internet, thereby avoiding the need to bring customers to their doorstep by bus or otherwise.</p> <p>Not only are rural residents able to sell their wares online, they can shop online. Regular sightings of Tesco delivery vans in remote areas may not bring joy to the hearts of all but they are making a big difference to how country-dwellers shop – and online shopping extends to clothing, gardening tools and plants, DIY equipment, even greenhouses. One can go for days, even weeks, without getting into a car or onto a bus to go shopping.</p> <p>IT developments are also generating a growing number of weekly commuters who work in the major conurbations (sometimes abroad) for a few days a week, then return to their rural residence to home-work for a couple of days a week. Again – no daily use of car or bus involved.</p>	
Acc 4208/5	<p>This proposed measure becomes unreasonable in the light of the fact that the Welsh Government cut the PCC transport budget by 27% this year. The Bus Operators Grant was cut by 25%. The Welsh Government is not so committed to its Key Policy Objective of reducing demand for travel by private car as to ring fence funding for or guarantee minimum levels of public transport. It will be up to bus operators to decide where and when to provide services. No one can know from one year to the next whether a bus service will operate, so rural property owners will only be able to look ahead a year at a time when determine whether or not they will be permitted to invest in their properties.</p> <p>The focus of rural accessibility should be on broadband, not buses; this DSPG is outdated, irrelevant and unreasonable. It should not be adopted.</p>	<p>Please see response to Acc 1307/4 above.</p> <p>No change is recommended.</p>
Acc 3237/1 Mr David Lort-Phillips	<p>An attempt to introduce micro-management of the detailed life of rural communities by such a measure is wholly inappropriate at time of public sector retrenchment, rapidly changing attitudes to home working, broadband use, personal travel, online shopping habits etc. It reflects a now outdated policy approach.</p> <p>Calling in aid Welsh Govt planning policy in an attempt to set a general rule based on the distance</p>	<p>The policy position is established through the Local Development Plan which has been tested through the Examination process. The accessibility issue itself has been the subject of an appeal which was dismissed, with the Inspector reporting:  <i>“The appellants dispute the Authority’s contention, and</i></p>

Ref	Comment	Officer Response
	<p>and frequency of bus services is unwarranted and cannot work.</p> <p>One has only to look at the way Tan 6 general policies on car travel are qualified by the exceptions, taken from TAN 6 itself and quoted in paras 2.3 and 2.4 of the SPG, to see that the application of such a policy would lead the NPA into a marshland of subjectively-based administrative decisions, in practice made by those unfamiliar with the reality of life in a rural community today.</p> <p>A planning policy based on a current network of bus services which will almost certainly face variation and retrenchment cannot work. It will introduce the kind of uncertainty and subjectivity which an effective planning system should seek to avoid. Furthermore the proposal has little or nothing to do with the statutory duties of the Authority.</p>	<p><i>consider the bus service to be more than adequate to serve the needs of a rural community. They also find it strange that planning permission should rely on what the Authority perceives as an adequate bus service. However, the Authority's objection appears to run deeper than that, reflecting its wider concern that the location of development should be sustainable, such as to place less reliance on the use of the motor car. In this respect the Authority's stance is wholly consistent with national planning policies."</i></p> <p>This would suggest that the approach is up-to-date with current thinking and is fully in line with the planning duties of the Authority.</p> <p>No change is recommended.</p>
Acc 3457/1 Friends of Pembrokeshire National Park	On this occasion we do not feel we have anything to add.	<p>Comment noted.</p> <p>No change is recommended.</p>
Acc 1092/1 Bourne Leisure Limited	<p>Whilst the consultation document seeks to create opportunities for reducing car use in rural areas, and aims to direct the majority of new development to settlements with good accessibility by non-car modes, there are listed 'exceptions' to this. Whilst the company considers that the principle of 'exceptions' is good, given that a site may be acceptable even though it may not be accessible other than by the private car, Bourne Leisure objects to the exclusion of tourism-related uses (such as caravan park-type visitor accommodation and their associated facilities) within these listed 'exceptions'.</p> <p>The Company considers that many tourism uses, including the most obvious example of tourism sites for caravans, are car dependent or are in locations where it may be difficult to provide access by sustainable transport modes. This is acknowledged at paragraph 3.10 of TAN18: Transport, March 2007, which recognizes that the car is important for accessibility in rural areas. Paragraph 3.15 of TAN18 continues to state that a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy. With paragraph 4.43 of the PCNP Local</p>	<p>The policies in the Local Development Plan seek to prevent additional caravan sites and pitches and therefore the change sought by this representor would not be relevant.</p> <p>No change is recommended.</p>

Ref	Comment	Officer Response
	Development Plan recognizing that the “ <i>National Park countryside is an important contributor to tourism</i> ”, greater flexibility should be demonstrated in the SPG and its approach should be one that recognizes that in relation to tourism uses, there is often no alternative available other than private car for reaching tourist-related development in more remote areas.	
Acc 1092/2 Bourne Leisure Limited	Whilst paragraph 4.3(a) of the draft SPG lists <i>visitor attractions, recreational and leisure activities</i> to be acceptable in principle in non-accessible locations, the Company considers this list to be too imprecise and ambiguous and therefore greater clarification is sought. Bourne Leisure requests that the list be amended to instead refer to the tourism sector as a whole. Further text should refer more specifically to caravan park-type visitor accommodation and their associated facilities falling within these exceptions, given the rural locations in which such facilities are often situated. It is vital to the local and wider economy that the tourism sector is not hindered and is continually promoted within the National Park Authority area by both the statutory development plan, and SPG policy, as it provides key economic benefits e.g. By ensuring that the tourism sector can continue to grow, and that the visitor economy can thrive all year round.	Please see response to Acc 1092 above.  No change is recommended.

## Draft Supplementary Planning Guidance to the Local Development Plan for the Pembrokeshire Coast National Park

### Low Impact Development - Making a Positive Contribution

#### Summary of consultation responses and recommended changes to the guidance

NRW comment	Suggested response
<p><b>Paragraph 1.14</b></p> <p>We welcome the recognition that National Park status will be a consideration in line with the LDP and to amplify National Guidance when considering One Planet development proposals.</p>	<p>No changes required.</p>
<p><b>Paragraph 2.8</b></p> <p>We welcome the requirement that social and economic benefits of One Planet development must not adversely affect the environment.</p>	<p>No changes required.</p>
<p><b>Paragraph 2.13 e</b></p> <p>We welcome the requirement for reversible structures where feasible to minimise longer term impacts should the project fail.</p> <p>We welcome the minimisation of waste and the ethos of recycling advocated in terms of energy &amp; water by occupants of the site.</p>	<p>No changes required.</p> <p>No changes required.</p>
<p><b>Paragraphs 2.14 and 2.15</b></p> <p>We welcome the requirement to minimise development and its footprint to what is required to meet the needs of the overall project, and minimise impacts on the National Park landscape.</p>	<p>No changes required.</p>

NRW comment	Suggested response
<p><b>Paragraphs 2.17 and 2.18</b></p> <p>Many existing buildings, and particularly older buildings, in the open countryside may provide roosts for protected species e.g. bats. We acknowledge the reference to the need to consider 'Paragraph 3.4 Baseline Description' of the Welsh Government's Practice Guidance which recognises the need to identify 'important flora and fauna' on the site. However, given the potential effect on protected species, we suggest that the Supplementary Planning Guidance clarifies that where the re-use or removal of buildings is involved developers should ensure that to inform the planning application and ensure there is no detriment to the favourable conservation status of European Protected species or other protected species, an appropriate species survey is undertaken by a suitably qualified person at the relevant time of year.</p>	<p><b>Paragraph 2.16</b> to be amended as follows:</p> <p>Re-use of existing buildings:</p> <p>Within the National Park the National Park Authority is particularly keen that those buildings that make a positive contribution to the character of the area through their intrinsic architectural merit, their setting in the landscape are re-used where they are present. If you are uncertain if buildings on your site meet this description, seek the advice of the National Park Authority. <b>An appropriate species survey may be required.</b> Opportunities to re-use buildings which are available on the proposal site should have been investigated and shown to be impracticable for re-use before new buildings are proposed.</p> <p><b>Footnote 7, page 6</b> be amended as follow:</p> <p>See paragraph 4.47 &amp; 4.48 <b>&amp; 4.50</b> of the Pembrokeshire Coast National Park Local Development Plan.</p>
<p><b>Paragraphs 2.19 to 2.21</b></p> <p>We welcome the clarification that development proposals will need to consider the potential impact on views, particularly from public routes and viewpoints. We suggest that the Supplementary Planning Guidance clarifies that, as part of the assessment of visual impacts, the applicant should seek discussions with both the LPA and Natural Resources Wales to select appropriate viewpoints, and to identify how any potential impacts may be avoided or mitigated.</p> <p>In terms of screening the site we would expect that trees of local/native providence</p>	<p>The offer of assistance with determining viewpoints is on the face of it helpful. However, from an applicant's perspective this could be confusing. The Authority would welcome opportunities for its Officers to liaise with Natural Resources Wales if needed when discussing viewpoints with potential applicants. No change is proposed.</p> <p><b>Paragraph 2.21</b> to be amended as follows:</p> <p>Where adverse effects are identified, mitigation measures such as 'screen planting' will need to be identified. These mitigation measures should deal with both temporary and permanent landscape effects and in themselves should not result in any adverse effects on the landscape. <b>Plants of native species and local providence should be favoured in new planting.</b></p>
<p><b>Paragraph 2.23</b></p> <p>We welcome the clarification that the potential impact on the local landscape from any ancillary development will be need to be consider as part of any proposal.</p>	<p>No changes required.</p>

NRW comment	Suggested response
<p><b>Paragraph 2.25</b></p> <p>We welcome the recognition that lighting will need to be carefully controlled. This is applicable to the site and also in particular its effect upon local biodiversity/wildlife.</p>	<p><b>Paragraph 2.25</b> to be amended as follows:</p> <p>Lighting: As One Planet Developments may be located in the countryside, away from other forms of development, the impact of lighting needs to be taken into account when assessing <b>potential landscape and visual impacts, and any impacts on wildlife</b>. In the National Park the introduction of lighting that will be visible in otherwise unlit areas of countryside will not be permitted.</p>
<p><b>Paragraph 2.27 h - energy</b></p> <p>We welcome the advice that energy will be required to be produced within the site, thereby minimising the introduction of additional power lines across the countryside to the detriment of the visual amenity of the area.</p>	<p>No changes required as this is a tangential additional point to those in the guidance and it is also possible to be grid connected without overhead lines.</p>
<p><b>Para 2.27 h - water needs.</b></p> <p>We note that a majority of the water needs should emanate from the site. This requirement needs to be assessed in the light of other local water requirements and any cumulative effects upon water bodies. Additionally we would be concerned about any possible adverse effects upon local water bodies under the Water Framework Directive.</p>	<p>No changes required. These issues are covered in general in the national guidance (3.61 &amp; 3.62) and going deeper here is not justified in National Park terms.</p>
<p><b>Paragraph 2.47</b></p> <p>We welcome the inclusion of a section on pre-application discussions within this Supplementary Planning Guidance. Natural Resources Wales would welcome the opportunity to participate in pre-application discussions involving low impact development within the national park, and would encourage you to insert such a statement in this Supplementary Planning Guidance.</p>	<p><b>Paragraph 2.47</b> to be amended as follows:</p> <p>In paragraph 1.14 of the Practice Guidance emphasis is placed on the importance of prospective One Planet Developers engaging with the local planning authority from the outset to discuss emerging proposals as part of pre-application discussions. The Pembrokeshire Coast National Park Authority <b>and their partners</b> would underline the value of these pre-application discussions. However, it will be more productive from both sides if the prospective applicant, before making an appointment with the National Park Authority, has a clear idea of the nature of the development that is proposed and how it can be achieved. The more information that can be provided on the development at this stage the better and clearer will be the advice offered by the National Park Authority. Therefore, to discuss a scheme before submitting an application the National Park Authority ideally will need to know:</p>



NRW comment	Suggested response
<p><b>Para 2.49.</b></p> <p>Reference is made to details required by Pembrokeshire Coast National Park Authority as;</p> <p>site drainage and water environment</p> <p>Notwithstanding the above, we also suggest that the Supplementary Planning Guidance recommends that scheme proponents should use biodiversity data held by the local authority and/or by the local environmental records centre to inform the design of the scheme and measures intended to make a positive environmental impact (as part of criterion 10).</p>	<p>No changes required. These issues are covered adequately in the national guidance (3.4 &amp; 3.6) and going deeper here is not justified in National Park terms.</p>