

Report of Consultations

Pre - Formal Consultation on the Preferred Strategy

Pembrokeshire Coast National Park Replacement Local Development Plan

Includes comments received up to 7th April 2017

May 17th 2017

Pembrokeshire Coast National
Park Authority

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Introduction

1. The National Park Authority commenced revising the Local Development Plan replacement Preferred Strategy through a series of workshops with Members commencing in July 2016.
2. Following each workshop stakeholders were engaged informally on the redrafting of the Preferred Strategy text. As the process was informal the comments below are summarised and are not attributed. This engagement was primarily via emails, meetings, and from feedback from presentations made.
3. [Workshops](#) were also held with representatives from Town & Community Councils.
4. A list of all those engaged can be found in Appendix A.
5. Table 1 summarises the changes made in the replacement Local Development Plan.
6. Changes that were suggested and have not been can be found in Table 2. The reasons why are also set out in summary.
7. Candidate Site matters are dealt with separately.

Table 1 Changes Made

The table below has three columns, the first column provides the main Plan reference, e.g, Chapter 1, the second column provides the section title and the third column summarises the main change made.

Plan Reference	Title	Main Change
Chapter 1		
	The Local Development Plan	Factual updates Roll forward to describe current preparation
	What is a Preferred Strategy?	Factual updates
	National Planning Policy	Factual updates
	The Pembrokeshire Coast National Park Management Plan	Factual updates
	Evidence Gathering	Factual updates New section on the Well-being of Future Generations Act 2015
	Engagement	Factual updates
	Sustainability Appraisal and Habitats Regulations Assessment	Factual updates
	Equalities Impact Assessment	New
	Tests of Soundness	New
	Candidate Sites	Factual updates
	Key Diagram, Proposals Map & Constraints Map	New
Chapter 2		
	Key Issues	Factual update Affordable Housing and Housing Growth update to reflect the use of the Local Housing Market Assessment.
Chapter 3		
	Vision	Factual update Roll forward to 2031 Update employment vision to reflect current national planning policy Clarify where new development is directed to.
	Objectives	Accurate referencing of the Environment Act 1995. Cross referencing updates and national planning policy references updated. Sustainable Design to reflect national planning policy

Plan Reference	Title	Main Change
		Enjoyment, Employment and Waste
	Key Outcomes	Affordable housing and housing growth to reflect the proposed strategy to focus on the delivery of affordable housing. Not all housing need can be addressed. Revise housing provision targets for 2031. Waste update to reflect national planning policy changes. Employment/live/work and mixed use sites update to reflect outcomes of the candidate site process. Update national policy, Circular, Background Papers and Regional Plan references.
Chapter 4		
	Translating the Vision	2021 roll forward to 2031 Factual updates National policy and guidance references update. Update regarding the preparation of an Alternative Options and Sustainability Background Paper.
National Park Purposes and Duty		
Para 4.11 to 4.13	National Park Purposes and Duty	No change
Policy 1	National Park Purposes and Duty (Strategy Policy)	Edits to accurately reflect the Environment Act 1995.
Spatial Strategy		
		New Key Diagram Includes a summary on the options considered
	Tenby – Local Service and Tourism Centre	Roll forward the Vision Development allocations review Factual updates
Policy 2	Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)	Update the strategy for affordable housing delivery Development allocations review Footnote updates
	Newport – Local Centre	Roll forward the Vision Update population estimate Development allocations review Factual updates Add reference to Welsh speakers Update bus service reference Refer to the business centre Refer to visitor numbers in the holiday periods Refer to developing Newport as a visitor attraction Refer to the need to provide employment

Plan Reference	Title	Main Change
		opportunities Include reference to parking issues Refer to a wider range of holiday accommodation
Policy 3	Newport Local Centre (Tier 3) (Strategy Policy)	Update the strategy for affordable housing delivery Review Policy 3c) live work units allocation Review development allocations Footnote updates
	Saundersfoot – Local Centre	Roll forward the vision Factual updates
		Development allocations review
Policy 4	Saundersfoot Local Centre (Tier 3) (Strategy Policy)	Update the strategy for affordable housing delivery Working harbours reference updated to reflect changes to Policy 18 Review development allocations Footnote updates
	St Davids - Local Centre	Factual update Roll forward the Vision Development allocations review
Policy 5	St Davids Local Centre (Tier 3) (Strategy Policy)	Update the strategy for affordable housing delivery Review Policy 5d) live work units allocation Employment allocations in Table 3 for review. Housing Allocations review Footnote updates
	Crymych – Local Centres	No change
	Rural Centres	Factual update Roll forward the Vision Add New Centres Review reference to accessibility and servicing Review Centre references to flooding Identify issues emerging for Newgale.
		Review development allocations
Policy 6	Rural Centres (Tier 4) (Strategy Policy)	Add New Centres
	Countryside	Roll forward the vision to 2031 Update the strategy for affordable housing delivery Review references to accessibility Review references to employment opportunities in line with national planning policy. Cross reference to new Diversification Policy 48A Update re national policy on One Planet Development

Plan Reference	Title	Main Change
		<p>Update National Planning Policy references and references to the Joint Unitary Development Plan</p> <p>Supplementary Planning Guidance update on Farm Buildings</p> <p>Advise that Supplementary Planning Guidance on biodiversity will be prepared</p> <p>Advise regarding national planning policy on farm buildings</p> <p>Insert a summary of options considered</p> <p>Insert a summary of the Review Report changes anticipated.</p> <p>Review references to assessing the impacts of traffic.</p>
Policy 7 Para 4.46 to 4.53	Countryside (Tier 5) (Strategy Policy)	<p>Include reference to the principle of development.</p> <p>Employment opportunities review</p> <p>Spatial Strategy for countryside locations</p> <p>Review references to accessibility.</p> <p>Affordable housing delivery requirements reviewed.</p> <p>Rural enterprise policy in national policy updated.</p> <p>Review references to assessing the impacts of traffic.</p> <p>Insert reference to exceptional land releases for development that is subject to coastal change.</p> <p>Include criterion for Gypsy Traveller sites policy</p>
Key Actions		Deleted
A. Special Qualities		
	Special Qualities	Update reference to Background Papers And Supplementary Planning Guidance update on Landscape Character
Policy 8	Special Qualities (Strategy Policy)	<p>Updates to footnotes needed.</p> <p>Update to accurately reflect national park purposes.</p> <p>Refer to cumulative impacts.</p> <p>Refer to the importance of addressing fragmentation and loss of connectivity.</p>
Policy 9	Light Pollution	<p>Update to accurately reflect national park purposes.</p> <p>Refer to cumulative impacts.</p>
	Light Pollution	Update to accurately reflect national park purposes and to provide advice on mitigation.
	Biodiversity	Planning Policy Wales and guidance updates.
Policy 10	Local Sites of Nature	Update to accurately reflect national park

Plan Reference	Title	Main Change
	Conservation or Geological Interest	purposes.
	Biodiversity	Add references to The Environment (Wales) Act 2016 and The Well-being of Future Generations (Wales) Act 2015. Supplementary Planning Guidance update
Policy 11	Protection of Biodiversity	Widen to encompass biodiversity outside Local Biodiversity Action Plans.
	Biodiversity	Widen to encompass biodiversity outside Local Biodiversity Action Plans.
	Welsh Language	Amended to comply with national planning policy
Policy 12	Welsh Language	Amended to comply with national planning policy
	Welsh Language	Amended to comply with national planning policy
	Historic Environment	Planning Policy Wales updates Supplementary Planning Guidance update
Policy 13	Historic Landscapes Parks and Gardens	Policy deleted.
	Historic Environment	Planning Policy Wales update Supplementary Planning Guidance update
Policy 14	Protection of Buildings of Local Importance	Update to accurately reflect national park purposes and to provide advice on mitigation.
	Historic Environment	Refer to the 'integrity' rather than condition of the 'building'.
Policy 15	Conservation of the Pembrokeshire Coast National Park	Update to accurately reflect national park purposes and to provide advice on mitigation. Refer to cumulative impacts. Refer to 'seascape'. Refer to the Seascape and Landscape Supplementary Planning Guidance.
	Landscape	Refer to the importance of national parks in national planning policy. Supplementary Planning Guidance update Clarify the geographical limits to which policy and guidance applies where available. Insert reference to Historic Parks and Gardens and Historic Landscapes Insert a cross reference to major development, nationally significant infrastructure projects and developments of national significance which are covered in the next chapter.
	Open Space and Green Wedges	Update regarding new Open Space Assessment. Planning Policy Wales update

Plan Reference	Title	Main Change
		Include reference to the options considered.
Policy 16	Open Space and Green Wedges	No change – sites to be shown on the Deposit Plan
	Open Space & Green Wedges cont'd	Update regarding Planning Policy Wales
	Coast	No change
Policy 17	Shore Based Facilities	No change
	Coast cont'd	No change
Policy 18	Porthgain, Saundersfoot, Solva and Tenby Harbours	Delete reference to ' <u>working</u> ' harbours
	Coast cont'd	Explanation for why the deletion of the reference 'working' Complementing existing harbour uses advice provided. Remove reference to 'viable' Refer to the Saundersfoot regeneration strategy.
B. Major Development, the Potential for Growth		
	Major Development	Update to refer to new consenting regimes National Planning Policy update
	Nationally Significant Infrastructure Projects & Developments of National Significance in Wales	New informative sections inserted
	Ministry of Defence	Updated to reflect the position as at June 2016
	Hazardous Installations	
Policy 19	Hazardous Installations	
	Hazardous Installations cont'd	Update needed. See new approach to identifying safeguarding zones under changes to Appendix 3 below
	Scale and Location of Growth and Table 1 and 2	Deleted.
		National Planning Policy updates
Policy 20	Scale of Growth	Updated to provide a strategic picture of the scale of growth envisaged across various land uses.
	Minerals	National and Regional Planning Policy updates
Policy 21	Minerals Safeguarding	Minerals safeguarding includes new mineral sources
	Minerals cont'd	Update to include reference to igneous rock and slate and new footnote for British Geological Society Maps.
Policy 22	Buffer Zones	
	Minerals cont'd	National Planning Policy updates
Policy 23	Borrow Pits	National Planning Policy updates

Plan Reference	Title	Main Change
	Minerals cont'd	
Policy 24	Local Building Stone	National Planning Policy updates
	Minerals cont'd	National Planning Policy updates
Policy 25	Recycled, Secondary and Waste Materials	
	Minerals cont'd	Update reference from Environment Agency to Natural Resource Wales
Policy 26	Inactive Mineral Sites	
	Minerals cont'd	Factual updates to Penberry Prohibition Order, land instability Supplementary Planning Guidance and National Planning Policy updates.
	Waste	Factual update to new national policy context, removal of reference to Regional Waste Plan, removal of Tenby Civic Amenity Site text and update of St Davids context.
Policy 27	Local Waste Management Facilities	National policy and guidance change.
	Waste cont'd	Update reference to Technical Advice Note 21:Waste
Policy 28	Composting	National policy change
	Waste cont'd	Update to reflect national policy context, Natural Resources Wales reference update.
C. Climate Change, Sustainable Design, Renewable Energy Flooding		Title of the section reordered
	Climate change Sustainable Design, Sustainable Energy	Update reference to the main contributors to CO2. Update Environment Agency references to Natural Resources Wales Include a summary of options considered for policies and the changes envisaged in the Review Report.
Policy 29	Sustainable Design (Strategy Policy)	National Policy Change Improvements in the main building are not workable and have been deleted.
	Sustainable Design	Update the national and local policy contextual references and Environment Agency references changed to Natural Resources Wales.
Policy 30	Amenity	No change
	Sustainable Design cont'd	No change
Policy 31	Minimising Waste	No change
	Sustainable Design cont'd	No change
Policy 32	Surface Water Drainage	No change
	Sustainable Design cont'd	Environment Agency references changed to Natural Resources Wales. Advice regarding culverting inserted. Sentence regarding submitting an

Plan Reference	Title	Main Change
		assessment of the suitability of sustainable urban drainage systems deleted.
Policy 33	Renewable Energy	Amended to ensure the cumulative impacts of offshore developments can be taken into account.
	Renewable Energy	Updated context in light of the Renewable Energy Assessment update. Additional advice provided on the meaning of the terms 'small', 'medium' and 'large' for various technology. Advice on how anaerobic waste facilities will be treated is provided. Update to national planning policy references Supplementary Planning Guidance update Cross reference to the nationally significant infrastructure projects section inserted.
	Flooding & Coastal Inundation	Substantively updated section with new policies. The policies relate to coastal change management.
Policy 34	Flooding and Coastal Inundation	Factual updates to the footnotes Cross referencing to relevant maps improved. Updated to reflect the need for more instructive policies to be set in place. Include cross reference to Policy 8 Special Qualities. Include reference to Flood Maps and DAM Maps not including an allowance for climate change.
Policy 34a	Development in the Coastal Change Management Area (New Policy)	See above
Policy 34b	Relocation of existing permanent dwellings affected by coastal change (New Policy)	See above
Policy 34c	Relocation and replacement of development (other than residential) affected by coastal change (New Policy)	See above
Key Actions		Deleted
D. Visitor Economy, Employment		
	Visitor accommodation, Attractions, Leisure Activities and Recreation	Supplementary Planning Guidance update Summary of change needed in this section as advised in the Review Report. A summary of Options considered is

Plan Reference	Title	Main Change
		included Refer to innovative approaches to holiday accommodation provision. Review references to assessing the impacts of traffic.
Policy 35	Visitor Economy (Strategy Policy)	Review in light of new Caravan, Camping and Chalet Landscape Capacity Assessment. Include reference to providing for hotels. Clarify the approach to when self catering will be permitted. Aligning the approach to allowing visitor attractions and recreational facilities with the strategy's approach to employment undertakings Update to national planning policy references.
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
Policy 36	Loss of Hotels and Guest Houses	Evidence required referred to in the policy wording.
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	Supplementary Planning Guidance update Factual update Cross reference to Policy 7d) inserted.
Policy 37	Self-Catering Development	Clarify the approach being taken.
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	Clarify regarding national planning policy as to the opportunities to secure affordable housing. Simplify the text regarding the imposition of conditions.
Policy 38	Camping, Touring Caravans, Statics and Chalet Sites	Deleted
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	Deleted
	Caravan Camping and Chalet Development	New section and policy inserted in light of new Caravan, Camping and Chalet Landscape Capacity Assessment.
Policy 38A	Caravan Camping & Chalet Development	New Policy inserted. Refers to glamping in a footnote to the heading. Role of the supporting assessment 'versus' the policy wording clarified.
Policy 39	Upgrading Statics, Touring Sites and Tent Pitches	Deleted – see New Policy 38A
	Visitor accommodation,	Deleted – See New Policy 38A

Plan Reference	Title	Main Change
	Attractions, Leisure Activities and Recreation cont'd	
Policy 40	Site Facilities on Tent, Chalet and Caravan Sites	Refer to camping rather than tents
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	Refer to camping rather than tents
Policy 41	Change of Use from Tent Pitches to Touring Caravan Pitches	Deleted – See New Policy 38A
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	Deleted – See New Policy 38A
	Employment	More information on the strategy provided National policy changes Factual updates Background studies updated. Deliverability of sites update. A summary of issues to address from the Review Report is included. Options considered for this section are summarised. Review references to assessing the impacts of traffic.
Policy 42	Employment Sites and Live/Work Units (Strategy Policy)	National policy changes Deliverability of Sites Farm diversification
	Employment cont'd	Clusters defined
Table 3	Allocations of Employment/Mixed Use Sites	Deliverability of Sites review
	Employment cont'd	National planning policy update
Policy 43	Protection of Employment Sites and Buildings	Update to reflect changes elsewhere regarding affordable housing provision. Insert requirement for evidence within the policy. Clarify the approach to be taken to prioritising the re-use of properties.
	Employment cont'd	No change
	Farm Diversification	See below.
Policy 43A	Farm Diversification	New Policy reflecting national planning policy. Approach set out reflects informal comments received regarding the use of the term 'secondary' and the approach being taken to the scale of new buildings.
Key Actions		Deleted

Plan Reference	Title	Main Change
E. Affordable Housing and Housing		
	Affordable Housing and Housing Provision	The chapter has been redrafted to comply with emerging national planning advice. Roll forward housing provision figures to 2031 Update housing projection figures Review viability for the delivery of affordable housing Update the options.
		Update Background Paper references Include reference to the role affordable housing plays in supporting local communities. Explain the role of the Land Allocation Implementation Study. Reference to recession deleted and completion figures included in the table showing potential housing land supply. Additional text added to allow for flexibility regarding density based on the character of the area. Reference to additional affordable housing being of benefit to local communities included. Options considered have been amended in response to informal comments received.
Policy 44	Housing (Strategy Policy)	Overall housing provision Deliverability of Sites
		Phasing of sites – see below regarding Table 8
Policy 45	Affordable Housing	Overall affordable housing provision Viability of sites Affordable Housing provision in the countryside (see Policy 7) Emphasise the delivery of rented accommodation rather than Low Cost Home Ownership
		National planning policy updates. Clarification of reference to the 10% change being a 'plus or minus'.
Table 7	Allocation of Housing Sites	Deliverability of sites Overall housing provision Viability of sites To become a policy in the Deposit Plan. See initial assessment of sites proposed in the Candidate Site Register.
	Affordable Housing and Housing Provision cont'd	Not effective or deliverable
Table 8	Phasing of Housing & Mixed Use Sites	Not effective or deliverable. Deleted.

Plan Reference	Title	Main Change
	Affordable Housing and Housing Provision cont'd	
Policy 46	Gypsy and Traveller Sites	Title updated. Equalities Impact Assessment recommendation
		Factual update
Policy 47	One Planet Development	Remove duplicate national planning policy references. Include need to comply with national planning policy.
	One Planet Development	Supplementary Planning Guidance update Additional cross referencing to Policy 9 for Lighting and Policy 33 for Renewable Energy Include reference to other standard planning considerations.
Key Actions		Deleted
F, Community Facilities, Retailing, Transport		
	Community Facilities	Update references to supplementary planning guidance Include references to options considered. Include a summary of Review Report changes anticipated.
Policy 48	Community Facilities and Infrastructure Requirements (Strategy Policy)	Review cross reference to Community Facilities allocations.
Table 9	Community Facilities	See initial assessment of sites proposed in the Candidate Site Register. Table 9 would become an allocations policy in the Deposit Plan. Allocations if made will be included in the Deposit Local Development Plan.
	Retail	National Planning Policy updates A summary of Options considered is included. A summary of Review Report changes are included
Policy 49	Retail in the National Park (Strategy Policy)	National Planning Policy updates
	Retail cont'd	National Planning Policy updates
Policy 50	Town and District Shopping Centres	
	Retail cont'd	Clarification of phrases.
Policy 51	Garden Centres	
	Retail cont'd	Clarify to refer to Local Development Plan Centres
	Sustainable Transport	Factual update Clarify the meaning of accessibility. Update regarding the availability of public transport and the rural nature of the

Plan Reference	Title	Main Change
		National Park.
Policy 52	Sustainable Transport (Strategy Policy)	Wording simplified
	Sustainable Transport cont'd	Update to identify schemes required for safeguarding in the Deposit Local Development Plan
Table 10	Road & Cycle Schemes	Review and update list of schemes in the Deposit Local Development Plan Will become a policy in the Deposit Local Development Plan.
	Sustainable Transport cont'd	National planning policy updates.
Policy 53	Impacts of Traffic	Regarding Centres a change is made to provide a context for facilitating parking provision that adequately serves the rural hinterland, maintains the vitality and viability of the local centre while at the same time avoiding undermining both the ability to provide public transport and the incentive to walk and cycle within the service centre. Update regarding the role of Traffic Impact Assessments as to when evidence is required.
	Sustainable Transport cont'd	Clarify the approach taken to requiring additional information. Reference to rolling forward Parking Supplementary Planning Guidance is included.
Policy 54	Cycleways	No change.
	Sustainable Transport cont'd	No change
	Utility Services	National planning policy updates
Policy 55	Powerlines and Pipelines	No change
	Utility Services cont'd	No change
Policy 56	Telecommunications	No change
	Utility Services cont'd	No change
Key Actions		Deleted.
Chapter 5	Monitoring	Inserted Appendix on Monitoring here. Updated to reflect the rolling forward of the Local Development Plan to 2031 and to address issues raised in Monitoring Reports regarding the use of certain targets and indicators. Include new indicators where needed. Delete indicators no longer needed. Included an indicator for Policy 46 Gypsy and Traveller Sites in response to the Equalities Impact Assessment.

Plan Reference	Title	Main Change
Chapter 6	Glossary of Terms	Factual updates Clarification of 'Accessibility' Explanation of 'Conserve' and 'Enhance' provided. Deliverability explanation included. Landscape capacity explanation updated. An explanation of 'Landscape Sensitivity Assessment' included. Major development definition deleted. An explanation of 'housing trajectory' is included. An explanation of a transport assessment is included. National planning policy updates
Chapter 7	References	Deleted
Appendix	National Park Portrait	Deleted
Appendix	Allocations	Review existing allocations New Local Development Plan end date 2031 Include in Deposit Plan
Appendix	Safeguarding Installations	Deleted. To be shown on the Constraints Map
Appendix	Monitoring	Deleted - Moved to Chapter 5
New Appendix	Planning Permissions	List Planning Permissions above a threshold – at Deposit Stage
Proposals Map – includes Key Diagram	Key Diagram will be available with the Preferred Strategy Proposals Map will be published with the Deposit Local Development Plan	Remove elements to be shown on New Constraints Map
		Update elements that are to be shown on the Proposals Map
		Insert New Inset Maps for new Rural Centres
		Review allocations Show new allocations
		Show planning permissions
New Constraints Mapping Publish with the Deposit Local Development Plan		Show on Website at Deposit Stage – not part of the Plan

Table 2 Changes not made and why

The table below has three columns, the first column provides the main Plan reference, e.g, Chapter 1, the second column provides the section title and the third column summarises the changes suggested but not made and a reason why. Where no change was suggested to the section the third column will be blank.

Plan Reference	Title	Change Not Made and Why
Chapter 1		
	The Local Development Plan	
	What is a Preferred Strategy?	
	National Planning Policy	
	The Pembrokeshire Coast National Park Management Plan	
	Evidence Gathering	
	Engagement	
	Sustainability Appraisal and Habitats Regulations Assessment	
	Equalities Impact Assessment	
	Tests of Soundness	
	Candidate Sites	
	Key Diagram, Proposals Map & Constraints Map	
Chapter 2		
	Key Issues	
Chapter 3		
	Vision	
	Objectives	
	Key Outcomes	
Chapter 4		
	Translating the Vision	
National Park Purposes and Duty		
Para 4.11 to 4.13	National Park Purposes and Duty	
Policy 1	National Park Purposes and Duty (Strategy Policy)	
Spatial Strategy		
	Tenby – Local Service and Tourism Centre	
Policy 2	Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)	
	Newport – Local Centre	Suggestion: The three local centre policies

Plan Reference	Title	Change Not Made and Why
		<p>(Policy 3 to 5) are repetitive and could be amalgamated.</p> <p>Response: One of the strengths of the spatial strategy is to allow local distinctiveness to be highlighted.</p> <p>Suggestion: Include reference to 1,000 residents and 4,000 to 4,500 and 40% second and holiday homes.</p> <p>Response: Without supporting evidence this cannot be included. A commentary is provided instead.</p> <p>Suggestion: Include reference to tight centre boundaries and providing some housing/affordable housing.</p> <p>Response: Await conclusions on these issues before advising further.</p>
Policy 3	Newport Local Centre (Tier 3) (Strategy Policy)	<p>Suggestion: Require housing to be used as a principal residence.</p> <p>Response: This would be contrary to national planning policy in Wales. See Housing Background Paper for commentary.</p>
	Saundersfoot – Local Centre	
Policy 4	Saundersfoot Local Centre (Tier 3) (Strategy Policy)	
	St Davids - Local Centre	
Policy 5	St Davids Local Centre (Tier 3) (Strategy Policy)	
	Crymych – Local Centres	
	Rural Centres	
Policy 6	Rural Centres (Tier 4) (Strategy Policy)	
	Countryside	
Policy 7 Para 4.46 to 4.53	Countryside (Tier 5) (Strategy Policy)	<p>Suggestion: Include policies on rebuilding ruins and the release of plots not provided for in the strategy where they would be providing local affordable housing.</p> <p>Response: These proposals are contrary to national planning policy.</p>
Key Actions		
A. Special Qualities		
	Special Qualities	<p>Suggestion: Include reference to vulnerable and rare species for protection and also promote both species richness (diversity of species) and species abundance</p>

Plan Reference	Title	Change Not Made and Why
		<p>(i.e. the number of individuals of a species present. Also, should air and water quality be included here as important?</p> <p>Response: The table contains the main themes (special qualities) to emerge from public consultation. Although they are not listed in the table as special qualities of the National Park in their own right, high air and water quality underpin several of the special qualities and people's experience of the special qualities. The principles of biodiversity protection listed in the representation are accepted and are included in the National Park Management Plan 2015-19. However, it is considered that there is sufficient context and detail for development planning purposes in the Policies 8, 10 and 11 and the associated text.</p>
Policy 8	Special Qualities (Strategy Policy)	<p>Suggestion: Please re-order of the special qualities in the policy.</p> <p>Response: The proposals would result in no real change in meaning which is likely to confuse readers when trying to compare Plans.</p>
		<p>Suggestion: Clarify the role of the policy in terms of dealing with national/international designations.</p> <p>Response: The policy should be read in conjunction with the section on Biodiversity which should provide the clarity needed.</p>
Policy 9	Light Pollution	
	Light Pollution	
	Biodiversity	
Policy 10	Local Sites of Nature Conservation or Geological Interest	
	Biodiversity	
Policy 11	Protection of Biodiversity	
	Biodiversity	
	Welsh Language	
Policy 12	Welsh Language	
	Welsh Language	
	Historic Environment	
Policy 13	Historic Landscapes Parks and Gardens	
	Historic Environment	
Policy 14	Protection of Buildings of Local	

Plan Reference	Title	Change Not Made and Why
	Importance	
	Historic Environment	
Policy 15	Conservation of the Pembrokeshire Coast National Park	
	Landscape	
	Open Space and Green Wedges	
Policy 16	Open Space and Green Wedges	
	Open Space & Green Wedges cont'd	
	Coast	
Policy 17	Shore Based Facilities	
	Coast cont'd	
Policy 18	Porthgain, Saundersfoot, Solva and Tenby Harbours	
	Coast cont'd	
B. Major Development, the Potential for Growth		
	Major Development	
	Nationally Significant Infrastructure Projects & Developments of National Significance in Wales	
	Ministry of Defence	
	Hazardous Installations	
Policy 19	Hazardous Installations	
	Hazardous Installations cont'd	
	Scale and Location of Growth and Table 1 and 2	
Policy 20	Scale of Growth	
	Minerals	
Policy 21	Minerals Safeguarding	
	Minerals cont'd	
Policy 22	Buffer Zones	
	Minerals cont'd	
Policy 23	Borrow Pits	
	Minerals cont'd	
Policy 24	Local Building Stone	
	Minerals cont'd	
Policy 25	Recycled, Secondary and Waste Materials	
	Minerals cont'd	
Policy 26	Inactive Mineral Sites	
	Minerals cont'd	
	Waste	
Policy 27	Local Waste Management Facilities	

Plan Reference	Title	Change Not Made and Why
	Waste cont'd	
Policy 28	Composting	
	Waste cont'd	
C. Climate Change, Sustainable Design, Renewable Energy Flooding		
	Climate change Sustainable Design, Sustainable Energy	<p>Suggestion: Detailed wording changes. Response: The proposals would result in no real change in meaning which is likely to confuse readers when trying to compare Plans.</p> <p>Suggestion: Highlight the need for mitigation and an understanding of the energy use and demand of existing and potential developments. Response: Understanding and reducing energy use in buildings is specifically addressed in national planning policy guidance.</p>
Policy 29	Sustainable Design (Strategy Policy)	
	Sustainable Design	<p>Suggestion: Delete reference to Building Regulations. Response: It is considered helpful to advise what the expectations of the Authority are which are not going beyond national requirements.</p> <p>Suggestion: Reword the paragraph providing advice on surface water drainage and foul drainage. Response: The proposals would result in no real change in meaning which is likely to confuse readers when trying to compare Plans.</p>
Policy 30	Amenity	
	Sustainable Design cont'd	<p>Suggestion: is there a need to incorporate wellbeing? Response: The policy and supporting text deals with 'amenity'. The reasoned justification doesn't suggest that in terms of impacts on amenity a 'mere existence' is acceptable. It refers to a 'pleasant life' which is in keeping with the wellbeing goals and objectives.</p>
Policy 31	Minimising Waste	
	Sustainable Design cont'd	
Policy 32	Surface Water Drainage	
	Sustainable Design cont'd	

Plan Reference	Title	Change Not Made and Why
Policy 33	Renewable Energy	
	Renewable Energy	<p>Suggestion: Table to define RE technology scales was felt to be inappropriate with regard to wind and hydro.</p> <p>Response: These scales are derived from the Renewable Energy Assessment Update which considered modern energy generation capacities for each technology. They also align with adopted Renewable Energy Supplementary Planning Guidance for which specific landscape guidance is provided depending on turbine scale. In the context of the National Park, rather than a national context, these scales are considered to be appropriate.</p>
Policy 34 & Policy 34A,B,C	Flooding and Coastal Inundation	<p>Suggestion: Will the Adaptation Masterplan for Newgale include proposals for relocation of properties and if so should that also be referred to? Might a similar approach be adopted in other localities or at least the possibility allowed for in the policy? It might be preferable from a planning point of view for property relocation where there are significant numbers of property involved to be planned as a whole.</p> <p>Response: The Masterplan will not include policies for property relocation – that will be a matter for individuals and then the planning authority to deal with. The approach is intended to guide change in all those areas deemed to be ‘at risk’ in the Shoreline Management Plans – there’s a list of about 25 locations – spread over short, medium and longer term risk. It includes places like Solva, Amroth and Saundersfoot. These will be shown on the Proposals Map of the Deposit LDP. It is highly unlikely that whole-scale relocation can be planned for as ultimately it’s about land ownerships and land values.</p>
	Flooding & Coastal Inundation	
Key Actions		
D. Visitor Economy, Employment		
	Visitor accommodation, Attractions, Leisure Activities and Recreation	
Policy 35	Visitor Economy (Strategy Policy)	
	Visitor accommodation, Attractions, Leisure Activities	

Plan Reference	Title	Change Not Made and Why
	and Recreation cont'd	
Policy 36	Loss of Hotels and Guest Houses	
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
Policy 37	Self-Catering Development	
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
Policy 38	Camping, Touring Caravans, Statics and Chalet Sites	
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
	Caravan Camping and Chalet Development	
Policy 38A	Caravan Camping & Chalet Development	
Policy 39	Upgrading Statics, Touring Sites and Tent Pitches	
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
Policy 40	Site Facilities on Tent, Chalet and Caravan Sites	
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
Policy 41	Change of Use from Tent Pitches to Touring Caravan Pitches	
	Visitor accommodation, Attractions, Leisure Activities and Recreation cont'd	
	Employment	
Policy 42	Employment Sites and Live/Work Units (Strategy Policy)	
Table 3	Allocations of Employment/Mixed Use Sites	
	Employment cont'd	
Policy 43	Protection of Employment Sites and Buildings	
	Employment cont'd	
	Farm Diversification	
Policy 43A	Farm Diversification	Suggestion: Make Farm Plans a requirement. Response: Farm Plans cannot be a

Plan Reference	Title	Change Not Made and Why
		requirement under national planning policy.
Key Actions		
E. Affordable Housing and Housing		
	Affordable Housing and Housing Provision	Suggestion: Self build proposals are preferential to one planet developments. Response: Planning cannot make specific provision for self build. One Planet development proposals are prescribed by national policy.
		Suggestion: Reference should also be made to the recent WG Longitudinal viability study and its recommendations (although accept we don't know which ones will be implemented at this stage). Response: A formal response by Welsh Government to the recommendations of the longitudinal study is needed.
Policy 44	Housing (Strategy Policy)	
Policy 45	Affordable Housing	
Table 7	Allocation of Housing Sites	
	Affordable Housing and Housing Provision cont'd	
Table 8	Phasing of Housing & Mixed Use Sites	
	Affordable Housing and Housing Provision cont'd	
Policy 46	Gypsy Sites	
Policy 47	One Planet Development	Suggestion: Self build proposals are preferential to one planet developments. Response: Planning cannot make specific provision for self build. One Planet development proposals are prescribed by national policy. Suggestion: Include additional policy references. Response: Policies most likely to be engaged (other than the standard development control type policies) are referred to. Not all suggested have been included. Suggestion: Preclude certain types of one planet development e.g. large settlements. Response: Justification would be needed for example a landscape capacity study.
	One Planet Development	

Plan Reference	Title	Change Not Made and Why
Key Actions		
F, Community Facilities, Retailing, Transport		
	Community Facilities	
Policy 48	Community Facilities and Infrastructure Requirements (Strategy Policy)	Suggestion: Include car parking as a community facility. Response: Some car parks can play a role as a community facility but this is unlikely to be the case for all. To recognise the role that car parking can play please see proposed changes to Policy 53 Impacts of Traffic which should address the point.
		Suggestion: It would be useful if viability issues were only addressed once when the planning application was considered. Response: This would not be compliant with national planning policy.
Table 9	Community Facilities	
	Retail	
Policy 49	Retail in the National Park (Strategy Policy)	
	Retail cont'd	
Policy 50	Town and District Shopping Centres	
	Retail cont'd	
Policy 51	Garden Centres	
	Retail cont'd	
	Sustainable Transport	Suggestion: Include reference to Active Travel. Response: Where land use implications of Active Travel are known these will be reflected in the Local Development Plan, e.g., cycle schemes.
Policy 52	Sustainable Transport (Strategy Policy)	
	Sustainable Transport cont'd	
Table 10	Road & Cycle Schemes	
	Sustainable Transport cont'd	
Policy 53	Impacts of Traffic	
	Sustainable Transport cont'd	
Policy 54	Cycleways	
	Sustainable Transport cont'd	
	Utility Services	
Policy 55	Powerlines and Pipelines	
	Utility Services cont'd	
Policy 56	Telecommunications	
	Utility Services cont'd	
Key Actions		
Chapter 5	Monitoring	

Plan Reference	Title	Change Not Made and Why
Chapter 6	Glossary of Terms	
Chapter 7	References	
Appendix	National Park Portrait	
Appendix	Allocations	
Appendix	Safeguarding Installations	
Appendix	Monitoring	
New Appendix	Planning Permissions	
Proposals Map – includes Key Diagram		
Key Diagram will be available with the Preferred Strategy		
Proposals Map will be published with the Deposit Local Development Plan		
New Constraints Mapping		
Publish with the Deposit Local Development Plan		

APPENDIX 1 Comments and advice were sought from so far

Thank you to all those who provided informal comment and advice.

Affordable Housing Group for Pembrokeshire c/o Pembrokeshire County Council
British Holiday and Home Parks Association
CADW
Carmarthenshire County Council
Ceredigion County Council
Community & Town Councils
Department for Economy and Transport (DE&T) South and West Wales Trunk Road Agency
Dwr Cymru Welsh Water - Developer Services
Dyfed Archaeological Trust
Health & Safety Executive
Home Builders Federation
Hywel Dda University Health Board
Members of the Pembrokeshire Coast National Park Authority
Ministry of Defence
National Trust
Natural Resources Wales
One Voice Wales
Pembrokeshire Association of Local Councils
Pembrokeshire Business Panel
Pembrokeshire Community Energy Network
Pembrokeshire County Council
Pembrokeshire Gypsy & Traveller Accommodation Assessment Steering Group
Pembrokeshire Nature Partnership
Pembrokeshire Planning Agents c/o Pembrokeshire County Council
Pembrokeshire Sustainable Agricultural Network
Public Service Board c/o Pembrokeshire County Council
South West Wales Mineral Planning Group
South West Wales Waste Planning Group
The Environment Network for Pembrokeshire (TENP)
Welsh Government