

REPORT OF THE HEAD OF PARK DIRECTION

**SUBJECT: THE DEPOSIT LOCAL DEVELOPMENT PLAN (REPLACEMENT),
DRAFT SUSTAINABILITY APPRAISAL, DRAFT EQUALITIES IMPACT
ASSESSMENT, DRAFT HABITATS REGULATIONS ASSESSMENT, INITIAL
CONSULTATIONS REPORT**

Purpose of the Report

1. This item asks Members to approve the attached draft Deposit Local Development Plan (replacement) for consultation (Appendix 1). Appendix 1 also includes the Proposals Map (which includes the Key Diagram). Final edits carried out after the Local Development Plan workshop in January 2018 are listed in Appendix 5.
2. Also requested for approval are the following:
 - the Sustainability Appraisal – web link provided in the footnote below ¹. A summary is attached as Appendix 2.
 - the Equalities Impact Assessment – web link provided in footnote 1 below. A summary is attached as Appendix 3.
 - the Habitats Regulations Assessment – web link provided in footnote 1 below. A summary is attached as Appendix 4.
 - the Initial Report of Consultations – web link provided in the footnote below².
3. It is anticipated that the consultation will be during April and May 2018. Town and Community Councils have been notified that these papers are available to view on the Authority's website.
4. Officers are also currently placing updated background papers³ on the website as supporting information and evidence.

Deposit Plan

5. The **Deposit Plan** sets out:
 - Where we are now: What key issues need to be addressed?
 - Where we want to be: An overall vision for the future
 - How we get there: A land use strategy for the National Park identifying the scale of overall development proposed, where it will be located and what other strategic policies are needed to help implement the strategy.

¹ [Pembrokeshire Coast National Park - Appraisal Processes](#)

² Initial Consultation Report: <http://www.pembrokeshirecoast.wales/default.asp?PID=836>

³ [Pembrokeshire Coast National Park - Background Papers](#)

- **A Key Diagram** showing the areas of the National Park affected by the proposed strategy (inserted in the Proposals Map document).
- A **Proposals Map** illustrating each of the Plan's policies and proposals with a spatial component. Please see Appendix 1 for the above.

Constraints Map

6. A **Constraints Map** is used to show delineations which are determined by other mechanisms – web link provided below⁴. It does not form part of the Deposit Plan.

Sustainability Appraisal

7. The **Sustainability Appraisal** sets out:
 - how the appraisal was carried out;
 - any difficulties encountered in undertaking the appraisal;
 - the rationale for the options considered and the reasons for selection of the preferred option and for the rejection of alternatives (noting that this will include wider, non-Sustainability Appraisal considerations);
 - the story behind the Plan's preparation, including the role of the Sustainability Appraisal in developing, refining and choosing between options;
 - the anticipated effects of the Plan;
 - any proposed mitigation or enhancement measures (and information as to how these have been reflected in the Plan); and
 - proposals for monitoring (i.e. potential indicators for monitoring the significant effects identified through the Sustainability Appraisal).
8. Appendix 2 provides a summary of the Sustainability Appraisal. Edits have been made to the Local Development Plan as a result of the assessment. See footnote 1 on the previous page for the web link to the document.

Equalities Impact Assessment

9. The Public Equality Duty requires the Authority to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good 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).
10. The Replacement Local Development Plan has been subject to an Equality Impact Assessment in line with the Equality Act 2010. Appendix 3 provides a summary. Edits have been made to the Local Development Plan as a result of

⁴ Constraints Map: <http://www.pcnpa.org.uk/Files/files/Mapping/constraints/index.html>

this assessment. See footnote 1 on the first page of this report for the web link to the document.

Habitats Regulations Assessment

11. Pembrokeshire Coast National Park Authority is a competent authority under the Conservation of Habitats and Species Regulations 2017⁵ (“the Habitats Regulations”). In accordance with Regulation 105 of those regulations, Pembrokeshire Coast National Park Authority must make an assessment of the Local Development Plan as a matter of law before it is adopted⁶. This assessment is generally referred to as a ‘Habitats Regulations Assessment’ (HRA) and the regulations set out a clearly defined step-wise process which must be followed.
12. A draft Habitats Regulations Assessment of the Local Development Plan (Replacement) to 2031 has been prepared. See footnote 1 on the first page of this report for the web link to the document.
13. The draft Habitats Regulation Assessment screens all the draft Local Development Plan policies and potential housing allocations in respect of the potential for likely significant effects upon any European site, either alone or in combination with other plans and projects.
14. Following a preliminary screening, six policies and six potential housing allocations were identified as potentially having a likely significant effect. Mitigation measures, in the form of suggested amendments to the wording of policies and/or supporting text, were identified in respect of all twelve of these elements.
15. Assuming the recommended mitigation measures are all accepted (proposed edits are incorporated in Appendix 1 for Members to consider), it is possible to screen out all the policies from the need for further assessment. In the consultant’s opinion, the Local Development Plan (as amended by the proposed mitigation measures) would then have no likely significant effect either alone or in combination with other plans and projects and there would be no need for a subsequent appropriate assessment under the Habitats Regulations.
16. **The Initial Consultation Report** also requires Members’ approval (web link on the first page of this report). It identifies those who have been engaged during the development of the Local Development Plan and highlights the main issues raised through the consultation and how responses received have affected the development of policies and proposals of the Deposit Plan. A full set of comments received and proposed responses can also be found at the web link provided on the first page of this report. The Initial Consultation Report includes a conversion chart for policy numbering which has changed between the Preferred Strategy and the Deposit Local Development Plan.

⁵ The Conservation of Habitats and Species Regulations 2017 SI No 1012

⁶ Refer Regulation 105

Evidence Base

17. Background Papers are included on the Authority's website.⁷ This is to ensure that the Local Development Plan is based on real evidence so that the Plan can be deemed to be 'sound'.
18. The Background Papers include plans and proposals by other organisations.
19. These Background Papers will be updated and added to throughout the preparation of the Plan. Officers are continuing to update in advance of the Deposit Plan consultation.

Timetable

20. In terms of timetable the Authority is still compliant with its Delivery Agreement and the intention is to place the Plan formally 'on Deposit' during April/May 2018. The Authority is also obliged (after the Local Development Plan has reached Deposit stage) to submit to the Welsh Government for agreement an updated timetable. This timetable must turn the indicative timings (contained in the Delivery Agreement) into definitive timings for the remaining stages. When agreed with the Welsh Government this should be publicised. It is suggested to Members that the indicative timetable contained within the Delivery Agreement already approved by the Welsh Government should be submitted for confirmation. Officers will report back to Members formally on any changes necessary as a result of discussions with the Welsh Government.
21. A summary of the timetable is set out below:

What	When
Local Development Plan Deposit Consultation	April/May 2018
Submission to the Welsh Government for Examination	December 2018
Independent Examination – Hearing Sessions	Spring 2019
Adoption	End of 2019/Early 2020

Preparing a Statement of Common Ground

22. The Local Development Plan Manual advises:
 - **Paragraph 6.4.2.18:** Agreeing with key infrastructure providers a 'statement of common ground' that can be refined as work on the plan progresses can be a useful way to evidence commitment and deliverability.
 - **Paragraph 7.5.1.1:** Where there are strategic and/or substantial objections to the deposit plan, or ones from statutory consultees, the

⁷ [Pembrokeshire Coast National Park - Background Papers](#)

LPA may wish to discuss further with the respondent(s), whether they will reconsider their objection, and which aspects can be agreed in order to narrow the disagreement to its essentials. Including areas of agreement/disagreement with substantive objectors, which may include a compromise position, in a “statement of common ground” for the Inspector would be helpful at this stage (Submission Stage). Any subsequent contact with respondents should be identified in the consultation database.

23. The reason for preparing such statements is to assist the Inspector in his or her deliberations. Officers need authorisation to enter into such discussions. Officers will make it clear that such discussions would be at an Officer level only and formal endorsement by the National Park Authority of the Statement of Common Ground would be necessary where it differed from the approach set out in the Deposit Local Development Plan.

Consultation Arrangements

24. As set out in the Delivery Agreement this will include press releases, press notices and information on the website. All those on the consultation database will be notified. All those who have submitted representations on the Preferred Strategy will be notified of the outcome. As before with the Pre-Deposit period an eight-week consultation is proposed to give Town, City and Community Councils more time to respond. Once the Deposit Consultation has been completed Officers will organise workshops to report back to Members. Dates for potential workshops are already set aside in your diaries until the National Park Authority Meeting in June 2018. It is likely however, that workshops will recommence after June 2018.

Risk considerations

25. Revising the Plan is a statutory requirement. The risks associated with preparing this Local Development Plan are set out in the Authority’s Delivery Agreement.

Financial considerations

26. Local Development Plan revision is budgeted for by the Authority.

Welsh Language considerations

27. 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. The impacts on the Welsh language also forms part of the appraisal process.

Human Rights considerations

28. The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and

conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it interferes with.

29. The process for Local Development Plan preparation and its rigorous assessment procedures will support this approach.

Recommendations

Members are asked to:

- 1. Approve the Initial Consultation Report on the Local Development Plan Preferred Strategy.**
- 2. Approve the Pembrokeshire Coast National Park Local Development Plan (Replacement) for placing on Deposit for receipt of representations.**
- 3. Approve the Sustainability Appraisal of the Deposit Plan.**
- 4. Approve the Equalities Impact Assessment of the Deposit Plan.**
- 5. Adopt the Habitats Regulations Assessment for the Deposit Plan.**
- 6. Give delegated powers to the Head of Park Direction to discuss areas of agreement and disagreement with those submitting representations proposed to the Deposit Plan. The National Park Authority will in due course be formally asked to approve any 'Statement of Common Ground' for formal Submission where the proposals differ from those set out in the Deposit Local Development Plan.**
- 7. Authorise the Head of Park Direction to submit the indicative timetable for the remaining stages of the Local Development Plan as set out in the Delivery Agreement for agreement to the Welsh Government.**

Background documents

[Pembrokeshire Coast National Park Local Development Plan Adopted September 2010](#)

[Welsh Government Local Development Manual August 2015](#)

[Planning Policy Wales Edition 9 November 2016](#)

[Welsh Statutory Instrument 2005 No. 2839 The Town & Country Planning \(Local Development Plan\) \(Wales\) Regulations 2005](#)

[Welsh Statutory Instrument 2015 No.1598 The Town & Country Planning \(Local Development Plan\) \(Wales\) \(Amendment\) Regulations 2015](#)

[Local Development Plan Review Report](#)

[Annual Monitoring Reports](#)

[Local Development Plan Delivery Agreement](#)

[Community & Town Council Workshops](#)

[Background Papers](#)

[Preferred Strategy Papers](#)

[A Guide to the Examination of Local Development Plans, The Planning Inspectorate](#)

(For further information please contact Martina Dunne, Head of Park Direction extension 4820.)

Pembrokeshire Coast National Park

Local Development Plan 2 (Replacement) - end date 2031

Deposit Local Development Plan

PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY

National Park Authority Meeting 28th March
2018

Draft for Approval

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Key Diagram – see separate document
Proposals Map – see separate document

List of Policies

Policy Number	Policy Title
National Park Purposes and Duty	
Policy 1	National Park Purposes and Duty (Strategy Policy - overarching)
Spatial Strategy	
Policy 2	Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy)
Policy 3	Newport Local Centre (Tier 3) (Strategy Policy)
Policy 4	Saundersfoot Local Centre (Tier 3) (Strategy Policy)
Policy 5	St Davids Local Centre (Tier 3) (Strategy Policy)
Policy 6	Rural Centres (Tier 4) (Strategy Policy)
Policy 7	Countryside (Tier 5) (Strategy Policy)
A. Special Qualities	
Policy 8	Special Qualities (Strategy Policy)
Policy 9	Light Pollution
Policy 10	Sites and Species of European Importance
Policy 11	Nationally Protected Sites and Species
Policy 12	Local Sites of Nature Conservation or Geological Interest
Policy 13	Protection of Biodiversity
Policy 14	Welsh Language
Policy 15	Protection of Buildings of Local Importance
Policy 16	Conservation of the Pembrokeshire Coast National Park
Policy 17	Open Space and Green Wedges
Policy 18	Shore Based Facilities
Policy 19	Porthgain, Saundersfoot, Solva and Tenby Harbours
B. Major Development, the Potential for Growth	
Policy 20	Hazardous Installations
Policy 21	Scale of Growth (Strategy Policy)
Policy 22	Minerals Safeguarding
Policy 23	Buffer Zones
Policy 24	Borrow Pits
Policy 25	Local Building Stone
Policy 26	Recycled, Secondary and Waste Materials
Policy 27	Inactive Mineral Sites
Policy 28	Local Waste Management Facilities
Policy 29	Composting
C. Climate Change, Sustainable Design, Flooding, Sustainable Energy	
Policy 30	Sustainable Design (Strategy Policy)
Policy 31	Amenity
Policy 32	Minimising Waste
Policy 33	Surface Water Drainage
Policy 34	Renewable Energy (Strategy Policy)
Policy 35	Flooding and Coastal Inundation (Strategy Policy)
Policy 36	Development in the Coastal Change Management Area
Policy 37	Relocation of existing permanent dwellings affected by coastal change

Policy Number	Policy Title
Policy 38	Relocation and replacement of development (other than residential) affected by coastal change
D. Visitor Economy, Employment	
Policy 39	Visitor Economy (Strategy Policy)
Policy 40	Loss of Hotels and Guest Houses
Policy 41	Self-Catering Development
Policy 42	Caravan, Camping and Chalet Development
Policy 43	Site Facilities on Tent, Chalet and Caravan Sites
Policy 44	Employment Sites and Live/Work Units (Strategy Policy)
Policy 45	Protection of Employment Sites and Buildings
Policy 46	Agricultural Diversification
E. Affordable Housing and Housing	
Policy 47	Housing (Strategy Policy)
Policy 48	Housing Allocations
Policy 49	Affordable Housing (Strategy Policy)
Policy 50	Housing Densities and Mix
Policy 51	Gypsy Traveller and Showpeople Sites
Policy 52	One Planet Development
F, Community Facilities, Retailing, Transport	
Policy 53	Community Facilities and Infrastructure Requirements (Strategy Policy)
Policy 54	Retail in the National Park (Strategy Policy)
Policy 55	Town and District Shopping Centres
Policy 56	Garden Centres
Policy 57	Sustainable Transport (Strategy Policy)
Policy 58	Impacts of Traffic
Policy 59	Cycleways
Policy 60	Powerlines and Pipelines
Policy 61	Telecommunications

1. Introduction

What is a Local Development Plan?

- 1.1 The Plan includes the long term vision for the Pembrokeshire Coast National Park and the objectives and land use policies needed to deliver that vision. It includes a key diagram, area wide and area specific policies and allocations (sites for development and restraint). The Plan also includes a Proposals Map illustrating each of the Plan's policies and proposals with a spatial component.
- 1.2 This document outlines:
 - a) Where we are now
 - b) Where we want to be by 2031
 - c) How we can get there
- 1.3 Details of all stages of Local Development Plan preparation can be found in the Authority's Delivery Agreement.¹
- 1.4 The Planning and Compulsory Purchase Act 2004 provides the framework for Local Development Plans in Wales.
- 1.5 The Plan should be seen and read as a whole. Often there will be more than one policy relevant to a proposed development, and all policies will be taken into consideration. In order to make the Plan simple to follow and easily understood policies have been expressed as directly as possible. Issues such as landscape, amenity, access, and design will arise with practically all applications for development and separate policies are included on each of these aspects.

National Planning Policy

- 1.6 In producing the replacement Local Development Plan the National Park Authority has had regard to national planning policies.²In accordance with guidance contained in national planning policy Local Development Plan's should have regard to national planning policies but not repeat them. The Local Development Plan should therefore be considered in conjunction with the Planning Policy Wales, Edition 9, November 2016 which identifies those areas where clear statements of national development control policy should not need to be repeated in Local Development Plans. It should be noted therefore that the Local Development Plan only provides the policy framework for issues of a locally distinct nature. Development proposals that do not present specific locally distinct issues will be assessed in accordance with the requirements of national planning policy.

¹ Pembrokeshire Coast National Park - Delivery Agreement Local Development Plan 2

² Includes Planning Policy Wales, Circulars and Technical Advice Notes.

The Pembrokeshire Coast National Park Management Plan³

- 1.7 The land use planning dimension of the National Park Management Plan is put into effect through the statutory Local Development Plan for each National Park. The National Park Management Plan is of national importance. National Park Management Plan objectives and policies therefore prevail over regional and local policy as it is delivered in the National Parks. The Guidance adds: “Indeed the imperatives of the National Park purposes should be reflected in these other Plans, including the Local Development Plan”.⁴

Evidence⁵ Gathering

- 1.8 The wider policy context has been reviewed, for example national policy. Regional work as far as it has been developed was also considered. Primary research has also been reviewed and updated, for example, affordable housing viability, the original retail study and the original survey of towns and villages for facilities available. The Sustainability Appraisal has also been a significant contributor to the baseline information.

Well-being of Future Generations Act 2015

- 1.9 The Well-being of Future Generations Act 2015 concerns the embedding of the principle of sustainable development into all of the work carried out by public bodies and places a requirement on all public bodies to set out how they will progress the 7 well-being goals set out in the Act. As overarching sustainable development framework for Wales it is essential that sustainability appraisal of Pembrokeshire Coast National Park Authority’s replacement Local Development Plan has full regard for the Act and its goals. The Local Development Plan Manual Edition 2 also considers that a sound Local Development Plan must have regard for the Well-being goals of the Act. This is done through the Sustainability Appraisal of the replacement Local Development Plan and the Equalities Impact Assessment.
- 1.10 The Sustainability Appraisal Scoping Report has examined the compatibility and coverage between the Sustainability Appraisal Objectives and the 7 well-being goals of the Well-being of Future Generations Act 2015. The Sustainability Appraisal Objectives are largely compatible with the Well-being goals, with the majority of the goals being contributed to by at least seven of the Sustainability Appraisal Objectives. The exception is “A more equal Wales”, which has very minimal coverage within the Sustainability Appraisal criteria. The Plan’s Equalities Impact Assessment will ensure that this well-

³ Pembrokeshire Coast National Park - National Park Management Plan_2015 to 2019

⁴ National Park Management Plans Guidance, 2007 Countryside Council for Wales & Welsh Assembly Government paragraph 4.45, page 26.

⁵ See 6. Glossary of Terms

being goal is more effectively considered during the Local Development Plan revision (see below).

- 1.11 The Vision and Objectives Background Paper gives an appraisal of the Local Development Plan vision and objectives against the Well-being goals. Overall, they show a positive complementarity across all the goals. The Local Development Plan objectives particularly support 'A prosperous Wales', 'A resilient Wales', 'A Wales of vibrant communities' and 'A globally-responsible Wales'.
- 1.12 Local Development Plan 2 has been tested in the Vision and Objectives Background Paper to ensure that the Plan fits with the Pembrokeshire Wellbeing Plan.

Engagement

- 1.13 Local Development Plan 2 has been developed since June 2016 when the Authority's Review Report, Delivery Agreement and Sustainability Appraisal Scoping Report were completed. Liaison included the Authority's Members and external key stakeholders including Town and Community Councils. The Authority's Delivery Agreement sets out the approach taken to engagement. A variety of means were used to help with the development of the strategy. Representatives of neighbouring planning authorities have also been met or contacted to discuss the emerging Strategy.

Sustainability Appraisal and Habitats Regulations Assessment

- 1.14 Sustainability Appraisal has been used to help select the most sustainable policy option from the alternatives examined. This involved assessing the likely performance of policy options against a framework of environmental, social and economic sustainability objectives. These sustainability objectives were arrived at through identifying sustainability issues for the National Park as indicated by national policy and guidance, current knowledge and statistics, and the views of government and non-governmental agencies working in the National Park. The development of these objectives was subject to a public consultation as part of the scoping stage of the Sustainability Appraisal.
- 1.15 The Sustainability Appraisal incorporates a Strategic Environmental Assessment.⁶ A shadow Habitats Regulations Assessment has been prepared.
- 1.16 Please note that in limited instances the most sustainable policy option was not the preferred option selected. This happened where the soundness tests showed that a less sustainable policy option was necessary to meet the soundness tests.⁷

⁶ See [6. Glossary of Terms](#)

⁷ Please see Background Paper 'Alternative Options & Appraisal'

Equalities Impact Assessment

- 1.17 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, disability, gender (sex), gender reassignment, marriage/civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation). This work is being taken forward as part of the Sustainability Appraisal on the Local Development Plan and by preparing an Equalities Impact Assessment.

Tests of Soundness

- 1.18 In order to be adopted, a Local Development Plan must be determined 'sound' by the examination Inspector (S64 of the 2004 Act). Tests of soundness tests and checks are identified in Planning Policy Wales, Edition 9, November 2016 (ch2) and the Local Development Plan Manual Edition 2 August 2015 (ch8). Background Paper Alternative Options & Appraisal provides a commentary on the tests of soundness (and the sustainability appraisal summary) for each policy of the Plan.

Candidate Sites

- 1.19 Externally, developers and agents and organisations submitted sites for consideration. These were assessed as to their suitability for development using the Candidate Site Assessment Methodology Background Paper. Those considered to accord with the Preferred Strategy and those which did not were listed in the Register. The Preferred Strategy consultation and the Deposit Plan consultation provided additional opportunities to consider sites.

Key Diagram, Proposals Map & Constraints Map

- 1.20 The Key Diagram is included to illustrate the Plan's spatial strategy.
- 1.21 The Proposals Map is on an Ordnance Survey base: illustrating each of the Plan's policies and proposals with a spatial component; showing allocated sites, Centre boundaries and safeguarding areas, etc.; defining areas to which specified development management policies will be applied. Where spatial delineations are determined by other mechanisms they are not shown on the Proposals Map - a Constraints Map is used to show these delineations.
- 1.22 The Constraints Map shows, for example, spatial delineations determined by mechanisms other than the Local Development Plan (e.g. by TAN15 Development Advice Maps); this is considered beneficial in that the map can be amended readily to take account of changes that are not determined by the Local Development Plan. A Constraints Map, unlike the Proposals Map, is not a statutory requirement and is not part of the Local Development Plan.⁸

⁸ See Review Report June 2016 paragraph 100.

1.23 The designations which are shown on the Constraints Map are:

- a) Scheduled Monuments
- b) Historic Landscape Areas
- c) Historic Parks and Gardens
- d) Conservation Areas
- e) Special Areas of Conservation
- f) Special Protection Areas
- g) Sites of Special Scientific Interest
- h) National Nature Reserves
- i) Local Nature Reserves
- j) Marine Conservation Zones
- k) Coal High Risk Areas
- l) Technical Advice Note 15 Flood Extents
- m) Hazard Zones

1.24 The designations that are shown on the Proposals Map are:

Reference	Topic
Paragraph 4.21	Neighbouring Planning Authority
Policy 48	Direction of Future Growth
Appendix 1	Land with planning permission as at April 2017 (threshold applied)
Paragraph 4.24	Centre Boundary
Policy 14	Welsh Language Sensitive Area
Policy 17	Open Space Green Wedge
Policy 19	Harbour Areas
Policy 22	Minerals Safeguarding Zones
Policy 23	Mineral Buffer Zones
Policy 27	Inactive Minerals Site
Policy 36 Policy 37 Policy 38	Coastal Change Management Areas
Policy 48	Housing Allocations
Policy 54 and Policy 55	Retail Centre
Policy 55	Primary Frontage

2. Where we are now - National Park Portrait

- 2.1 A review has been carried out for the first Local Development Plan. This has been updated with regard to:
- a) identifying the Park's key attributes
 - b) identifying key messages in relevant Acts, Plans and Strategies for the National Park
 - c) showing what is going well for the National Park Local Development Plan adopted in 2010 and what key matters need addressing⁹
 - d) showing what matters the Authority as well as various stakeholders consider to be of significance
 - e) explaining the Park's role in the wider regional and national context.
- 2.2 The preparatory work can be found on the Authority's website.
- 2.3 What have been retained through the above analysis are six key priority issues that need to be addressed by this Local Development Plan. These issues must be addressed within a context of needing to achieve National Park purposes which are:
- a) 'to conserve and enhance the natural beauty, wildlife, and cultural heritage¹⁰ of the National Parks.'¹¹
 - b) 'to promote opportunities for the understanding and enjoyment of the special qualities [of the Parks] by the public.'¹²
- 2.4 These are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of irreconcilable conflict.¹³ Reflecting that National Parks are living landscapes with a resident population, the Authority also has a duty in taking forward the Park purposes to: 'foster the economic and social well-being of local communities, within the National Park....' This duty should be fulfilled in the pursuit of National Park purposes.¹⁴

Key issues to address

National Park Purposes

- Ensuring that government planning policy which is unique to National Parks is appropriately applied.

⁹ See Pembrokeshire Coast National Park Local Development Plan Review Report Adopted June 2016

¹⁰ See 6. Glossary of Terms

¹¹ Section 61 of the Environment Act 1995

¹² Section 61 of the Environment Act 1995

¹³ Section 62 of the Environment Act 1995

¹⁴ Section 62 of the Environment Act 1995

A. Special qualities

- How can the National Park's special qualities be protected for future generations? Can opportunities be taken to enhance those special qualities with new development?

B. Major development, the potential for growth

- In trying to meet the needs of local communities, how to make rational choices or decide on priorities where the need for land for development is greater than supply of suitable land. The Park is unable to accommodate all demands.¹⁵
- Given the shape and nature of the National Park it is important to recognise that it is highly dependent on the strategies of Pembrokeshire and of the wider West Wales area, in particular spatial strategies.

C. Climate change, sustainable design, renewable energy, flooding

- More has to be done to address factors contributing to climate change, and to manage and adapt to the effects of climate change.

D. Visitor economy, employment and rural diversification

- How to find an approach to development in the countryside which helps sustain and diversify rural communities yet guards against unsustainable development in countryside locations.
- How in land use planning terms can the National Park tackle seasonality in the visitor economy?
- The visitor economy does over-dominate in certain locations in the Park and this needs proactive management.
- How to maintain and enhance the visitor economy.

E. Affordable housing¹⁶ and housing growth

- How to tackle affordable housing need¹⁷ in the Park.

F. Community facilities

- How to continue to protect and enhance our range of community facilities in the National Park which are highly valued and needed facilities many of which are in locations remote from larger centres.

¹⁵ The ability of the National Park landscape to absorb development for this Plan period is tested using the methodology set out in the Candidate Site Methodology Background Paper.

¹⁶ See 6. Glossary of Terms

¹⁷ See 6. Glossary of Terms

- How to ensure the existing town, district and smaller shopping centres of the Park which serve local need and the needs of visitors remain attractive, diverse and viable.
- How to improve accessibility¹⁸ to and within the National Park whilst recognising the need to reduce the impact of motorised traffic and travel on the environment.

¹⁸ See 6. Glossary of Terms

3. Where we want to be – Vision and Objectives

Vision

3.1 The vision for the National Park below describes the land use elements of the National Park Management Plan Vision¹⁹. It:

- has a 15 year horizon
- is particular to this National Park
- takes account of the Welsh Government's agenda and policy and regional, partner and neighbouring authorities' strategies and plans.
- reflects national and international trends
- captures the essence of what people have told us in surveys²⁰

Local Development Plan Vision for the Pembrokeshire Coast National Park 2031

3.2 Development continues to respect and where possible enhance the special qualities. This means that the Park's population will not be able to increase significantly. The limited opportunities for development that can be made available are wherever possible made available for development that contributes most to sustaining local communities where compatible with the statutory National Park purposes.

3.3 Tenby, Newport, Saundersfoot, St Davids and many of the National Park's more rural communities have accommodated additional growth in housing in order to facilitate the delivery of affordable housing for the communities of the National Park. Employment development has been focussed at the Plan's centres. The National Park countryside continues to be the setting for many diverse interests and activities including farm diversification schemes and the conversion of buildings to various uses along with some limited housing opportunities.

3.4 New development has been predominantly directed to communities with sufficient services and amenities and linked by a convenient, low-impact and affordable public transport network. Significantly improved cycle, footway and public rights of way networks provide a clean and easily

¹⁹National Park Management Plans are of national importance. National Park Management Plan objectives and policies therefore prevail over regional and local policy as it is delivered in National Parks. Indeed the imperatives of National Park purposes should be reflected in these other Plans, including the Local Development Plan – paragraph 4.45, page 26, National Park Management Plans Guidance 2007, Welsh Assembly Government and the Countryside Council for Wales, 2007.

²⁰ See Background Paper 'Vision and Objectives' and the Community Consultation Background Paper.

accessible means of transport for our communities as well as support for increased recreational activity.

- 3.5 In common with the rest of the United Kingdom, the Park has been adapting to the changing climate. Development is more sustainable in design. There is, in new development, a distinctive but subtle vernacular building style that combines the best of the old with the best of the new. Renewable energy generation schemes are more popular. Development has been directed away from areas that are or will be prone to inundate or flood.
- 3.6 The Park benefits from being an unbeatable socially inclusive year-round visitor destination concentrating on its strengths: low impact marine and coastal recreation, access to wildlife-rich countryside, and peace and quiet.

Objectives

- 3.7 The objectives below set out how the Vision will be achieved to tackle the priority issues identified in Chapter 2. They derive from the National Park Management Plan and are refined to relate to land use planning matters and to identify what will be the key outcomes the Authority anticipates will be achieved during the life of the Local Development Plan. The strategy and policies of the Plan and the Monitoring section of the Local Development Plan provide more information on what is expected.
- 3.8 These objectives are set within a context of needing to achieve National Park purposes (see paragraph 2.3 and 2.4).

A. Special Qualities

Historic Environment²¹

- To conserve, enhance and promote the historic environment of the National Park, its archaeological resource, historic buildings and landscapes, parks and gardens (Policy 8, and Policy 15).

Biodiversity and Geodiversity

- To conserve and enhance appropriate habitats and species within the National Park and where appropriate to protect and promote the geological resource (Policy 8, Policy 10, Policy 11, Policy 12 and Policy 13).

Landscape and Seascape

- To conserve and enhance the special landscape and seascape character of the National Park (Policy 8 and Policy 16).

²¹ See [6. Glossary of Terms](#)

Welsh Language and Culture

- To conserve and enhance the cultural richness of the National Park (Policy 8 and Policy 14).

Key outcomes

- (1) The special qualities of the National Park have been conserved and enhanced.

B. Major development, the potential for growth

Scale and Location of Growth

- To promote a spatial strategy that minimises the need to travel. (Policy 2, Policy 3, Policy 4, Policy 5, Policy 6, Policy 7) When releasing the scarce land supply or considering the reuse of buildings in the National Park prioritise their use or reuse for development which contributes most to sustaining local communities (Policy 39, Policy 44, Policy 47, Policy 49 and Policy 53).

Minerals

- No new mineral workings or extensions to existing mineral workings will be allowed within the National Park other than in exceptional circumstances²² (Policy 22 to Policy 26).

Waste

- To provide local waste facilities for National Park waste or secure facilities outside the National Park to deal with this waste (Policy 28 and Policy 29).

Ministry of Defence

- No intensification of use or extension of Ministry of Defence sites will be allowed save in exceptional circumstances.²³

Key outcomes

- (2) Development takes place in accord with the strategy of the Local Development Plan.
- (3) Development permitted helps to sustain local communities
- (4) No new major development in the National Park unless there are exceptional circumstances.²⁴

²² Planning Policy Wales, Edition 9, November 2016, paragraph 14.3.2

²³ Planning Policy Wales, Edition 9, Welsh Government, November 2016 paragraphs 5.5.5 and 5.5.6

- (5) The provision of waste facilities which predominantly serve the National Park area²⁵

C. Climate change, sustainable design, renewable energy, flooding

Pollution, Unstable Land and Contamination

- To minimise the creation of new sources of pollution and contamination and to address issues relating to the instability of land within the National Park.²⁶ (Policy 8 and Policy 9)

Renewable Energy

- To improve energy conservation and efficiency and to contribute to national targets for renewable energy. (Policy 34)

Soil, Air and Water Quality

- To safeguard and enhance the soil, air and water quality of the National Park.^{27 28}(Policy 8)

Sustainable Design

- The design of all development in the National Park reflects its special landscape and townscape qualities and local distinctiveness, meets the highest standards for resource use including minimising waste, and takes account of the impact of a changing climate(Policy 9, Policy 30, Policy 31, Policy 32, and Policy 33).

Coastal Management

- To avoid development of undeveloped stretches of the coast at risk from flooding and/or erosion and to allow for any necessary adaptation by taking account of known and predicted climate change impacts on the coast (Policy 8, Policy 18, Policy 19, Policy 34, Policy 35, Policy 36, Policy 37 and Policy 38).

Flooding

²⁴ See Planning Policy Wales, Edition 9 November 2016 , paragraph 5.5.6 and 14.3.2; Minerals Technical Advice Note 1: Aggregates 2004, paragraph 52; Mineral Technical Advice Note (MTAN) Wales 2: Coal, paragraphs 74 to 79, page 159,

²⁵ Technical Advice Note 21: Waste - Areas of Search Maps for sub regional waste facilities excludes National Parks

²⁶ Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapter 12 and 13.

²⁷ Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapters 12 and 13.

²⁸ Water Framework Directive (2000/60/EC).

- To ensure vulnerable development does not take place in locations where it may be at risk from flooding or where it would increase the risk of flooding in another location. (Policy 35)

Key outcomes

- (6) Development achieving high standards in terms of sustainable design with all new dwellings meeting the standards set out in national planning policy.
- (7) The National Park contributing to renewable energy generation.²⁹
- (8) No highly vulnerable development³⁰ in areas at risk of flooding both now and in the long term and with no negative impacts elsewhere.

D. Visitor economy, employment and rural diversification

Employment

- Help to create and maintain a diverse, viable and sustainable local economy benefiting all sections of the community. (Policy 44, Policy 45 and Policy 46)

Enjoyment

- To attract a sustainable number of people at all times of the year to enjoy the special qualities of the National Park. (Policy 39)

Key outcomes

- (9) The National Park contributes to the provision of new employment and existing sites are safeguarded.
- (10) A range of holiday accommodation is available to meet the varying needs of visitors
- (11) Recreational and visitor activities do not damage the special qualities of the National Park

E. Affordable housing and housing growth

Housing

- To provide for housing to facilitate the delivery of affordable housing needs without compromising National Park purposes (Policy 47, Policy 48, Policy 49, and Policy 50).

²⁹ Please see Chapter '5. Monitoring'. Likely contributions are taken from the Renewable Energy Assessment (January 2016) Background Paper

³⁰ 'Vulnerable developments' are defined in the Technical Advice Note 15: Development and Flood Risk on flooding, please see Figure 2 page 7

Key outcomes

- (12) An estimated 960 new dwellings are delivered of which an estimated 250 are affordable.
- (13) A higher density of development is achieved – a minimum of 30 dwellings to the hectare.

F. Community facilities

Community Facilities

- To encourage the retention and provision of a network of community facilities which reflect the needs of both National Park residents and visitors (Policy 53).

Retail

- To maintain a vital and viable retail sector at an appropriate scale and at appropriate locations throughout the National Park (Policy 54 and Policy 55).

Transport

- To improve and promote accessibility³¹ by appropriate means and at appropriate times for the people who live, work, rest and play in the National Park whilst reducing the need to travel by private car (Policy 2, Policy 3, Policy 4, Policy 5, Policy 6, Policy 7, Policy 57, Policy 58 and Policy 59).

Utilities

- To ensure adequate provision of utilities³² for local communities and that this provision is compatible with the National Park designation and protection of its resources. (Policy 53, Policy 60, Policy 61)

Key outcomes

- (14) Existing community facilities are safeguarded and provision enhanced.
- (15) The National Park retail centres are vibrant and diverse.
- (16) Proposals that could have potentially caused significant concerns regarding traffic have been successfully discouraged through pre-application discussions.

A background paper entitled 'Vision and Objectives' sets out how the objectives above relate to the vision.

³¹ See [6. Glossary of Terms](#)

³² See [6. Glossary of Terms](#)

4. How we get there – Local Development Plan strategy and policies

Translating the vision and objectives into a Local Development Plan strategy and policies

- 4.1 The previous chapter set out a vision of ‘where we want to be’ and suggested some of the key outcomes which we will be looking to achieve in the Local Development Plan Period – by 2031. The purpose of this chapter is to address the question ‘how do we get there’ by setting out the spatial strategy and policies needed to realise the Local Development Plan’s vision and objectives.
- 4.2 The portrait in chapter 2 describes the kind of place Pembrokeshire Coast National Park is today. It has much strength: its attractiveness, the contribution of its environment to the local and national economy; its rich diverse culture; biodiversity and geodiversity and its quality of life. It is an enjoyable place to visit and keep healthy.
- 4.3 With this strength comes certain weaknesses; houses are expensive and difficult to afford, opportunities for house building and development more generally are limited. There is competition for housing from buyers of holiday and second homes. Issues of social exclusion arise as a consequence. Some popular areas become congested in the holiday season but are unable to justify a local bus service in the winter months.
- 4.4 The Pembrokeshire Coast National Park, by reason of its designation as an area of special landscape character, imposes fairly severe restrictions on development that would harm its special qualities. In addition, given that it is a predominantly rural area, the spatial scale of individual areas of change is not significant.
- 4.5 Guidance³³ advises that a generic ‘rural strategy’ approach may be more appropriate than exploring alternative spatial strategies and alternative sites within areas of change. Such an approach would consider broad policy options and principles with regard to issues such as affordable housing, village scale allocations, the role and development of market towns, diversification, the hierarchy and roles in terms of service provision etc.
- 4.6 This is the approach that has been taken here. However, given the shape of the National Park, the level of growth and its spatial distribution account needs to take of its position relative to neighbouring authorities. In this respect account has also been taken of the preparatory work for the

³³ LDP Manual, Welsh Government, paragraph 6.2.3.4 August 2015, page 64.

Wales Spatial Plan update 2008 in terms of exploring spatial options (see paragraph 4.14 onwards).

- 4.7 The strategy and policies below tackle the six priority issues identified in Chapter 2 'Where are we now?' and sets out a policy response to achieve the land use aspects of the vision and the objectives for the area as set out in Chapter 3. Where key actions outside the Local Development Plan are needed to support achievement of these policies these are also set out.
- 4.8 To remind you the six priority issues are:
- a) Special qualities
 - b) Major development, the potential for growth
 - c) Climate change, sustainable design, flooding, sustainable energy
 - d) Visitor economy, employment and rural diversification
 - e) Affordable housing and housing growth
 - f) Community facilities, retailing and transport
- 4.9 Policy responses are grouped under the six priority issues except those in relation to National Park purposes and duty and the spatial elements of the Plan which have been brought to the front of Chapter 4. Strategy policies are identified by the suffix 'Strategy Policy' and coloured with a yellow background. Supporting policies are coloured with a blue background.
- 4.10 The Plan has been heavily influenced by the Sustainability Appraisal and the application of the tests of soundness³⁴. Where other mutually exclusive policy options were explored the preferred strategy policy in the main text is highlighted with a ★ symbol. A summary explanation is provided as to what those other options were and why they were discarded in the Alternative Options Background Paper. Alternatives to the preferred spatial strategy are also set out in this Background Paper.³⁵ When a choice of options is available those options that perform best when considering both the sustainability appraisal scoring and the outcomes of the soundness tests together were chosen.

³⁴ See [6. Glossary of Terms](#)

³⁵ Please see [Alternative Options & Appraisal Background Paper](#)

National Park Purposes and Duty and the Spatial Strategy

National Park Purposes and Duty

- 4.11 There is one overarching policy in the Plan which deals with National Park purposes and duty.
- 4.12 National Park purposes are set out in the 1995 Environment Act. It could be suggested that inserting a policy is merely restating legislation but the two purposes coupled with the duty are so fundamental to the work of the Park Authority it is important to place them at the centre of the Local Development Plan.
- 4.13 Whilst the National Park is a landscape designation there are instances where strict application of the boundary in making decisions would not be appropriate. Cross boundary issues include wind energy development, seaward developments and transport infrastructure. The Authority will use this policy in considering proposals within its planning jurisdiction and in commenting on proposals outside of the National Park.

Policy 1 National Park Purposes and Duty (Strategy Policy)

Development within the National Park must be compatible with:

- a) the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and
- b) the public understanding and enjoyment of the special qualities.³⁶

In determining proposals, due regard will be paid to the need to foster the economic and social well-being of the local communities within the Park provided this is compatible with the statutory National Park purposes embodied in the foregoing considerations.

Spatial Strategy

- 4.14 The strategy for locating growth for the National Park is the Wales Spatial Plan³⁷ Pembrokeshire Haven Settlement Framework strategy. The Wales Spatial Plan preferred strategy was chosen for the 1st Local Development Plan because it delivered most in terms of the Sustainability Appraisal

³⁶These purposes are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of obvious conflict.

³⁷ See [6. Glossary of Terms](#)

objectives and the soundness tests required that regard was had to the Wales Spatial Plan.³⁸

- 4.15 The Local Development Plan appraisal of Wales Spatial Plan Option 3 considered that additional tiers (Tiers 4 'Rural Centres' and 5 'Countryside') were needed with development being targeted to locations that would be likely to be more accessible and more likely to support community facilities. The approach would help with conserving the National Park landscape and the strategy was quite tailored for individual settlements.
- 4.16 This preferred option is known as Option 4 'Focused Key Settlement/Hybrid Approach (with two additional Tiers)' and is the spatial strategy in the current adopted Local Development Plan.
- 4.17 The main spatial elements of the strategy are shown in the Key Diagram - see attached. This element of the strategy should be read within the context of the wider strategy in particular the overarching Policy 1 which deals with the National Park purposes and duty.
- 4.18 The overall aim of the framework for the Pembrokeshire Haven area is to achieve greater prosperity, attract inward investment, direct development to the main towns on the economic corridor, help sustain rural communities, achieve sustainability principles and protect the National Park.³⁹
- 4.19 This framework (Focused Key Settlement) when tested against other options⁴⁰ (in the sustainability appraisal) performed better in terms offering the clearest benefits for sustainability with employment, housing, environment and physical regeneration. It emphasises public transport and Information and Communication Technology improvements with additional measures aimed at addressing economic diversification, the development/retention of skills, housing affordability, environmental stewardship and mitigation⁴¹ of and adaptation to climate change effects.⁴²
- 4.20 The Pembrokeshire Haven area has three strategic hubs, The Haven (Haverfordwest, Milford Haven/Neyland and Pembroke/Pembroke Dock), Carmarthen Town and Fishguard/Goodwick. These hubs will provide a regional role and will be a major focus for future investment and are known as Tier 1 Centres (apart from Fishguard/Goodwick). These hubs lie outside the National Park but some lie close to the National Park, for example Fishguard/Goodwick and the Haven hubs.
- 4.21 Towns and villages in the National Park have lower order roles and are included as either Tier 2 or Tier 3 Centres.

³⁸ Please see Alternative Options & Appraisal Background Paper

³⁹ Background Paper: Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 21

⁴⁰ Other options considered for the Wales Spatial Plan were 'Dispersed Strategy Growth', 'Two Centre Strategy'

⁴¹ See [6. Glossary of Terms](#)

⁴² Please see Alternative Options & Appraisal Background Paper

- Tier 2...Centres have a service centre, employment and tourism function.
- Tier 3...Centres are principally local centres with some being significant tourism centres.

4.22 To complement the Spatial Plan framework, which deals with the more strategic levels of the hierarchy in the Park, two additional tiers are proposed by the Authority:

- a) Tier 4 'Rural Centres' are identified for limited growth. These Centres have a limited range of facilities which should meet the day to day needs of residents. This approach should help sustain rural communities and reduce the need to travel.
- b) Tier 5 'Countryside' where in accordance with national planning policy development is strictly controlled except for certain forms of development that would normally be found in a countryside location.

4.23 This strategy underpins Policies 2 to 7 of the Local Development Plan.

4.24 When defining the extent of development permitted in Centres 'Centre boundaries' are used except where this is not compatible with the character of the Centre (see Proposals Map).

Tenby – Local Service and Tourism Centre

4.25 Background: Tenby is identified as a local service and tourism centre along with Fishguard/Goodwick, St Clears, Whitland and Narberth (Tier 2 Centres). Only Tenby lies in the National Park.

4.26 Tenby is superbly located on a peninsula of the south Pembrokeshire coast. Tenby has an estimated resident population of 4,517.⁴³ Tenby has a special identify in the Park as its only historic walled town and resort, with stunning cliff-top views over fine popular beaches. Tenby's special character includes important medieval, Georgian and Victorian architecture, the almost complete Town walls, a Conservation Area and 350 listed buildings. It has a picturesque working harbour with a constant bustle which visitors often spend time just watching the life of the harbour. Tenby's crescent harbour is an iconic Welsh image much used to popularise Wales and its coast. It hosts a wide variety of community facilities catering for all ages and tastes and it has a good bus service, a railway station and is located on the National Cycle Network. Tenby town centre is the leading retail centre of the Park but a lower order retail centre relative to other retail centres within the region including Carmarthen and Haverfordwest. Tenby serves residents, visitors and businesses and a rural hinterland which includes areas outside of the National Park. Tenby's visitor experience has been improved with peak season pedestrainisation of the Walled Town and Tenby has become an international centre for major triathlon-style sporting events.

⁴³ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

- 4.27 Issues for Tenby: Tenby has suffered some decline in tourism and with a historically buoyant property market this has led to the loss of hotel accommodation. Since the introduction of a policy of protection in earlier Plans unnecessary loss has been averted. Protecting against further loss where unjustified remains however an important consideration. Tenby continues to be a significant visitor centre as highlighted in the Wales Spatial Plan update.⁴⁴ There has been limited development of affordable housing, and the number of dwellings that are either second homes or holiday accommodation continue to be a concern. There are a number of traffic management issues giving concern, particularly congestion during the summer months.⁴⁵ There are amenity concerns about take-away and late night opening in Tenby Town Centre. There is a lack of all year round employment opportunities. Tenby has a regular rail service. There is a need to help Tenby's community prepare for and adapt to coastal change brought about as a result of climate change and sea-level rise, but this should not impair Tenby's potential to act as a Local Service and Tourism Centre .
- 4.28 Tenby by 2031: Tenby at the end of the Local Development Plan period is a quality tourism destination with a range of quality accommodation. Key buildings and sites in the area continue to be redeveloped to help regenerate the Centre. The harbour is protected and enhanced with linkages to Caldey Island. The Walls, historic buildings, panoramic views, beaches and ecosystems are conserved to maintain the special character of the town. Traffic is well managed and complements Tenby's role as a Local Service and Tourism Centre. Opportunities for cycling and walking within the town have been greatly enhanced by Active Travel route improvements along with links to neighbouring settlements. The town centre is still the leading retail centre in the Park. New housing developed in the town contains a substantial element of affordable housing.⁴⁶

Policy 2 Tenby Local Service and Tourism Centre
(TIER 2) (Strategy Policy)



Tenby is designated a 'Local Service and Tourism Centre' where the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local

⁴⁴ Background Paper: See page 112, Wales Spatial Plan update 2008

⁴⁵ There is a permanent Traffic Regulation Order in place for the seasonal pedestrianisation scheme within Tenby Town Walls. Traffic exclusion operates during the main summer holiday season.

⁴⁶ Background Paper: Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 14 & the Sustainable Regeneration Framework for Pembrokeshire Haven Spatial Plan area, 18 July 2007 version, pages 12, and 24

area (see Policy 47, Policy 48 and Policy 49).

- b) to permit proposals for small scale employment development to meet the needs of the local area (see Policy 44).
- c) to protect and enhance the town's facilities shopping centre which serve the needs of the local area and visitors (see Policy 39, Policy 53, Policy 54 and Policy 55).
- d) to protect and enhance the harbour area (see Policy 18).
- e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities (see Policy 8).
- f) to permit proposals that assist in delivering improved traffic management in the town (see Policy 57).
- g) to assist Tenby in preparing for and adapting to coastal change (see Policy 35, Policy 36, Policy 37, Policy 38).

Newport – Local Centre

4.29 Background: Newport with an estimated population of 860⁴⁷ residents nestles in an outstanding landscape setting⁴⁸ on gentle slopes between the foot of Carn Ingli and the quiet Afon Nyfer Estuary, which is itself protected from the open sea by the sand dunes and bars of Newport Sands. The panoramic view of the town and the Parrog (once the busiest harbour in north Pembrokeshire) from Newport Sands illustrates this perfectly as one of the best known and loved in the National Park. Visitors to Newport swell its population during the holidays.

4.30 Newport has a good range of facilities serving the town and the hinterland, and is classified as a 'district shopping centre' by Policy 54. It has a distinctive culture with a significant number of Welsh speakers leading to a strong sense of community. There are two Conservation Areas designated in recognition of Newport's distinctive character. It has a magical quality and the natural environment and peacefulness of the area are highly valued. It has a small employment park and business centre. Newport has a bus service during the week but this does not satisfy the community's evening and Sunday requirements. It is located on the National Cycle Network.

⁴⁷ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

⁴⁸ designated as a Landscape of Special Historic Interest in Wales

- 4.31 Issues for Newport: Difficulties for Newport include high house prices and a shortage of land for developing affordable housing. A high number of holiday and second homes is of concern as is an ageing population. The use of the Welsh language is declining. A general upgrading of community facilities is also considered necessary as is the developing of Newport as an attraction for tourism. Additional employment opportunities would be welcomed. Traffic volumes and turning movements continue to impact on the town despite measures being introduced in the past. Further improvements to traffic management would be welcomed including improvements to pedestrian safety and parking. There is a need to help Newport's community prepare for and adapt to coastal change brought about as a result of climate change and sea-level rise, but it should not impair Newport's potential to act as a Local Centre.
- 4.32 Newport by 2031: The future for Newport by the end of the Local Development Plan period will see it having had new housing developed in the town including a substantial element of affordable housing. Community and retail facilities are sufficient to serve the town and rural hinterland. Where feasible, traffic management measures have been introduced. The town's role as an attractive historic local centre has been protected and the town offers a range of holiday accommodation for its visitors.

Policy 3 Newport Local Centre (TIER 3) (Strategy Policy) ★

Newport is designated a 'Local Centre' where the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area (see Policy 47, Policy 48 and Policy 49).
- b) to permit proposals for small scale employment development to meet the needs of the local area (see Policy 44).
- c) to protect and enhance the district shopping centre and community facilities which serve the town and rural hinterland and visitors (see Policy 39, Policy 53, Policy 54 and Policy 55).
- d) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities (see Policy 8).
- e) to permit proposals that assist in delivering improved traffic management in the town (see Policy 57).
- f) to assist Newport in preparing for and adapting to coastal change (see Policy 35, Policy 36, Policy 37, Policy 38).

Saundersfoot – Local Centre

- 4.33 Background: Saundersfoot is a small (estimated population of 2,473)⁴⁹ but very popular family resort. The village has substantially grown since the 1950s. Buildings spread over the wooded hill slopes rising either side of the small flat-bottomed valley which bisects the village. The centre of Saundersfoot and the harbour area is designated a Conservation Area. Historically coal was mined in the area, and coal and tin exported. Tourism is now the principal industry, although the harbour at the heart of the village is well used by pleasure craft and a number of small fishing boats and retains a bustling workaday⁵⁰ character. Funding from the European Union and Tourism Infrastructure Support Scheme has contributed to the long-term viability of the harbour by improving access from the sea and extending coastal tourism activity. It is also the focus for a commercial area containing shops, restaurants and other businesses. Saundersfoot has a very good bus service and ‘compact’ village amenities. Policy 54 identifies Saundersfoot as a ‘district shopping centre’.
- 4.34 Issues for Saundersfoot: Issues for Saundersfoot include the need to complete the enhancement of the harbour area, the need to extend the holiday season. There are also amenity concerns about take-away and late night opening in Saundersfoot. Although the rail service is regular, the station is over a mile from the village. Holiday/second homes are of concern and there is a need to provide affordable housing. Generally, access from the north to the south of the village is poor. Saundersfoot village centre may face a potential long-term threat of flooding due to sea level rises⁵¹ and the community will need support from the local authority and other stakeholders to develop a strategy to allow the village to adapt to changes.
- 4.35 Saundersfoot by 2031: The future for Saundersfoot by the end of the Local Development Plan period will see it having had new housing developed in the village including a substantial element of affordable housing. Community and retail facilities are sufficient to serve the needs of the local community. Traffic is well managed. Opportunities for cycling and walking within the village have been greatly enhanced by Active Travel route improvements, along with links to neighbouring settlements and outlying services. The village’s seaside character has been protected and enhanced, including its harbour, and the hotel and guest house

⁴⁹ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

⁵⁰ 6. Glossary of Terms

⁵¹ South Wales Shoreline Management Plan, Policy Unit 16 Dolwen Point to Giltar Point.

accommodation is sufficient to serve the needs of visitors. The shopping and harbour areas are attractive and inviting.⁵²

Policy 4 Saundersfoot Local Centre (TIER 3) (Strategy Policy) ★

Saundersfoot is designated a 'Local Centre' where the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area (see Policy 47, Policy 48 Policy 49).
- b) to permit proposals for small scale employment opportunities to meet the needs of the local area (see Policy 44).
- c) to protect and enhance the district shopping centre and community facilities to meet the needs of the local area and visitors (see Policy 39, Policy 53, Policy 54 and Policy 55).
- d) to ensure developments permitted contribute to the protection and enhancement of the village's special qualities (see Policy 8).
- e) to permit proposals that assist in delivering improved traffic management in the village and accessibility to the railway station (see Policy 57)
- f) to protect and enhance the harbour (see Policy 19).
- g) to assist Saundersfoot in preparing for and adapting to coastal change (see Policy 35, Policy 36, Policy 37, Policy 38).

St Davids – Local Centre

4.36 Background: St Davids City enjoys a truly outstanding natural setting on the windswept coastal platform which forms the St Davids Peninsula.

⁵² Background Paper: Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 15 & the Sustainable Regeneration Framework for Pembrokeshire Haven Spatial Plan area, 18 July 2007 version, pages 12, and 25

The cathedral being the main focus for visits to St Davids dates predominantly from the 12th-16th century.

- 4.37 Today, St Davids and its peninsula forms one of the most important tourism resources in the National Park. The Wales Spatial Plan Framework acknowledges the important role St Davids plays as a tourist destination.
- 4.38 St Davids has an estimated population of 1,309⁵³ with a comparable range of facilities to Saundersfoot and Newport. The National Cycle Network also runs through the City.
- 4.39 Issues for St Davids: Neighbouring St Justinians and Whitesands Bay area also major tourist attractions which bring visitors to the area and add to the traffic management issues in and around St Davids. The existing Celtic Coaster service plays a part in resolving these issues. Affordable housing provision is necessary and the impact of second and holiday homes is a concern.
- 4.40 St Davids by 2031: The future for St Davids by the end of the Local Development Plan period will see it having had new housing developed in the town including an element of affordable housing. Significant cultural investment has taken place with the Cathedral Cloisters project and the Landscape Gallery Oriel y Parc. Community and retail facilities are sufficient to serve the needs of the local community. Traffic management measures have mitigated the adverse impacts of through traffic and traffic movements within the City and have addressed the traffic management issues at St Justinians. The City's role as an attractive historic centre is protected and enhanced and the hotel and guest house accommodation is sufficient to serve the needs of visitors.⁵⁴

Policy 5 St Davids Local Centre (TIER 3) (Strategy Policy) ★

St Davids is designated a 'Local Centre' where the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area (see Policy 47, Policy 48 and Policy 49).
- b) to permit proposals for employment development to meet the needs of the local area (see Policy 44).

⁵³ See Scale and Location of Growth Background Paper for more information on how this figure was calculated.

⁵⁴ Background Paper: Wales Spatial Plan, Pembrokeshire Haven, Key Settlement Framework 2021, page 15 & the Sustainable Regeneration Framework for Pembrokeshire Haven Spatial Plan area, 18 July 2007 version, pages 12, and 25

- c) to protect and enhance the district shopping centre and community facilities which serve the City and rural hinterland and visitors (see Policy 39, Policy 53, Policy 54 and Policy 55).
- d) to ensure developments permitted contribute to the protection and enhancement of the City's special qualities (see Policy 8).
- e) to permit proposals that assist in delivering improved traffic management in the City and wider peninsula (see Policy 57).

Crymych – Local Centre

4.41 Even though Crymych plays an important role for adjacent National Park communities only a small part of Crymych lies within the National Park. The future role of Crymych will be predominantly defined by opportunities outside the National Park.

Rural Centres

4.42 Background: To help sustain rural communities in the National Park an additional tier of Centres is identified called 'Rural Centres', listed below, which have at least 3 facilities normally found in a small village⁵⁵ or if fewer than this, at least 1 convenience shop.


4.43 Issues for Rural Centres: The level of service by public transport, sewerage treatment and water supply varies between the towns and villages listed in the hierarchy and improvements will be needed.⁵⁶ Known areas at risk from flooding include parts of Amroth, Angle, Broad Haven, Dale, Felindre Farchog, Little Haven, Llanychaer, Nevern, Newgale, Pontfaen, Solva and Wiseman's Bridge. There will be a need to help coastal communities prepare for and adapt to coastal change brought about as a result of climate change and sea-level rise.

4.44 Rural Centres by 2031: The future for Rural Centres is one where some additional development, including affordable housing development, has helped sustain local facilities and the need to travel to larger centres for day to day needs is no longer required. The accessibility of these centres to larger centres in the Park has also improved along with infrastructural services such as water supply and sewage disposal.

⁵⁵ Letter box, sports ground, primary school, pub, community hall, place of worship, convenience shop, post office – See Background Paper: Scale and Location of Growth Background Paper.

⁵⁶ Background Paper: Scale and Location of Growth Background Paper





4.45 In Rural Centres lying predominantly outside the National Park, opportunities for development are more likely to arise in those areas in the County Council's jurisdiction.


Policy 6 Rural Centres (TIER 4) (Strategy Policy) 

In Rural Centres the land use priorities will be:

- a) to provide for and or permit housing to facilitate the delivery of affordable housing for the local area in Centres with a Centre Boundary (see Proposals Map and Policy 47, Policy 48 and Policy 49)⁵⁷
- b) to permit housing through sensitive infilling in of small gaps or minor extensions (i.e. rounding off) in Centres without a Centre boundary (Policy 47 and Policy 49).
- c) to permit small scale employment developments(see Policy 44).
- d) to protect and enhance the Centre's range of facilities (see Policy 39, Policy 53 and Policy 55).
- e) to ensure developments permitted contribute to the protection and enhancement of the special qualities of the Centre (see Policy 8).
- f) to ensure development is of a scale that is consistent in scale with the size and character of the Centre.
- g) to assist coastal communities in preparing for and adapting to coastal change (see Policy 35, Policy 36, Policy 37, Policy 38).

Rural Centres lying in the National Park

Amroth	Manorbier
Angle	Manorbier Station
Bosherston	Marloes
Broad Haven	Moylegrove
Castlemartin	Mynachlogddu 
Cresswell Quay 	Nevern 
Dale	Newgale
Dinas Cross	Nolton Haven
Felindre Farchog	Pontfaen 
Herbrandston	Porthgain
Jameston	Rosebush

⁵⁷  Rural Centre without a Centre Boundary shown on the Proposals Map

Lawrenny	Solva
Little Haven	St Ishmaels
Lydstep	Trefin
Rural Centres lying partly in the National Park	
Carew*	Milton*
Cosheston* ⁵⁸	New Hedges
Hook*	Pleasant Valley*
Houghton*	Roch*
Lamphey*	Square and Compass
Llangwm*	Wiseman's Bridge

4.46 In those Rural Centres without a centre boundary infill and rounding off will be permitted where there is a physical cohesion of dwellings. Housing development will consist of infill for one or two units of a size compatible with its setting in a small gap in an otherwise continuous, built up frontage. 'Rounding off' which would complete or consolidate the built up perimeter will entail the development of no more than one or two dwellings.

4.47 The terms 'sensitive infilling' and 'rounding off' mean that:

- The plots are comparable in size and scale to those of adjoining properties and should be able to accommodate the number of units proposed. The dwellings are of a similar size, scale and massing to those in the area with amenity and circulation space comparable to adjoining properties.
- Sites must also meet all the other criteria against which a housing development would be judged.

Countryside

4.48 Background and Issues for the countryside: In the National Park countryside there is an estimated third of all households in the National Park which are scattered through small villages, hamlets, sporadic dwellings and farms. The National Park countryside is an important contributor to tourism, farming, conservation etc. Issues for the Park include finding the right approach to the amount of development to be permitted, taking account of accessibility issues, the need to sustain local communities and the need to protect the National Park landscape.

4.49 The National Park countryside by 2031: At the end of the Local Development Plan period the National Park countryside will continue to be the setting for many diverse interests and activities whilst respecting one of the Park's finest assets. Some limited development has helped contribute to the quality of life for its communities and visitors through farm diversification projects, conversion of buildings, One Planet proposals that contribute to government's sustainability agenda in the area and through appropriate

⁵⁸ *Lies predominantly within the County Council's planning jurisdiction.

recreational and visitor activities. To sustain communities whilst respecting national planning policy housing development will have been strictly controlled in the countryside⁵⁹ with some limited opportunities being allowed at appropriate locations outside the Centres listed earlier in the strategy. Converting buildings that contribute to the character of the countryside to a range of uses has assisted with sustaining communities particularly as the delivery of affordable housing through the development of market housing has been prioritised over self-catering. Effort has been made to minimise the need to travel in the countryside in new development through assessing infill and rounding off opportunities in terms their accessibility and through using a more rigorous approach to assessing traffic impact for developments in the countryside - see Policy 57 and Policy 58. Supplementary Planning Guidance on accessibility will be prepared.

4.50 Given the significant role and potential impact of farming on the National Park countryside Supplementary Planning Guidance⁶⁰ on siting and design of farm buildings will be prepared.

Policy 7 Countryside (TIER 5) (Strategy Policy) ★

Outside the identified Centres is countryside where development must be strictly controlled. The following forms of development will be acceptable in principle:

- a) it constitutes sensitive infilling of small gaps or minor extensions (i.e. rounding off)⁶¹ to isolated groups of dwellings is proposed. The release of such sites will be prioritised for affordable housing provision. Where affordable housing provision is not feasible on site market housing will be considered.⁶² Release of land will depend on the character of the surroundings, the pattern of development in the area and the accessibility to the Centres identified in the hierarchy.
- b) a new rural enterprise dwelling is proposed⁶³
- c) farm diversification including farm shops is proposed (see Policy 46).
- d) it constitutes the conversion of appropriate buildings

⁵⁹ Planning Policy Wales, Edition 9, November 2016, Chapter 9 Housing, paragraph 9.3.6

⁶⁰ See 6. Glossary of Terms

⁶¹ See paragraph 4.46 and paragraph 4.47 above for a definition.

⁶² Planning Policy Wales, Edition 9, November 2016, Chapter 9 Housing, paragraph 9.2.22.

⁶³ Planning Policy Wales, Edition 9, November 2016, Chapter 9 Housing, paragraphs 9.3.6 to 9.3.10

to a range of uses with market housing being given priority in residential conversions (see Policy 41). Conversion must not result in unacceptable adverse effect⁶⁴ upon the structure, form, character or setting of the building. The conversion of buildings that are obtrusively located in the landscape will not be permitted. Off-site affordable housing contributions will be sought on market dwellings.

- e) A rural enterprise or tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential (see Policy 39 and Policy 44).
- f) A new or extended community facility is proposed (see Policy 53).
- g) The proposal constitutes One Planet Development (see Policy 52).
- h) New farm buildings are justified for agricultural purposes.
- i) Land is released at the edge of a Centre for a small employment site⁶⁵ (See Policy 44) or an extension to an established business⁶⁶ in the countryside is required or it is a new business aiming to join existing clusters.⁶⁷
- j) There is an exceptional land release adjoining Centres for affordable housing to meet an identified local need (see Policy 49).
- k) Assisting coastal communities in preparing for and adapting to coastal change (see Policy 35, Policy 36, Policy 37, Policy 38).
- l) There is a need for an exceptional land release to relocate development affected by coastal change (see Policy 37 and Policy 38).
- m) There is a need for a Gypsy and Traveller site in a countryside location (see Policy 51).
- n) Renewable energy proposals (see Policy 34).

⁶⁴ 6. Glossary of Terms

⁶⁵ Planning Policy Wales, Edition 9, November 2016, paragraph 7.3.2

⁶⁶ Technical Advice Note 23, February 2014 paragraph 1.1.6 refers principally to traditional employment uses (Class B in the Use Classes order)

⁶⁷ Technical Advice Note 23, February 2014 paragraph 3.1.3

- 4.51 Infill and Rounding Off: Supplementary Planning Guidance on accessibility will be prepared. In order to prove that affordable housing provision is not feasible on the site the Authority will need to be provided with evidence from the registered social landlord and local authority advising that they have no interest in taking the site forward for development of affordable housing. In discussions with these social landlords the value of the land should reflect the fact that it would only be available for affordable housing, i.e. land values for exceptional land releases for affordable housing.
- 4.52 Conversion of buildings in the Countryside: Policy 7 sets out the uses that will be considered appropriate in the conversion of buildings in the countryside. This would include agricultural buildings, former churches and dwellings where the residential use is now lost. Technical Advice Note 6: Planning for Sustainable Rural Communities July 2010 and Technical Advice Note 23: Economic Development sections 3 set out detailed national planning development control considerations that need to be taken into account. Paragraph 3.2.2 of Technical Advice Note 23, Economic Development February 2014 provides for the option of prioritising employment-related uses in conversions. This Authority has attempted to prioritise employment-related uses under the Joint Unitary Development Plan and found this difficult to operate. Beyond holiday letting there is little demand for employment-related activities.
- 4.53 The policy aims to encourage reuse of buildings for employment and employment related activities (such as farm shops, tourism attractions, serviced accommodation and recreational activities. Employment-related uses could include residential conversion as a subordinate part of a scheme). Residential use would include market housing (full-time residential with no occupancy controls) and self-catering. In residential proposals market housing will be given priority over self-catering to assist with the delivery of affordable housing (Policy 41).
- 4.54 National planning guidance refers to buildings needing 'to be of a form, bulk and general design which are in keeping with their surroundings'.⁶⁸ In this National Park these are considered to be those that make a positive contribution to the character of the area through their intrinsic architectural merit or their setting in the landscape. Their interest and charm stems from an appreciation of the functional requirement of the building, their layout and proportions, the type of building materials used (including those constructed of stone, clom and slate), and their display of local building methods and skills.
- 4.55 The form, bulk, design and materials used in some buildings can make them visually intrusive in the landscape. Often those constructed of concrete blocks, asbestos sheeting, corrugated iron etc., clear-span buildings, Dutch barns, open-sided hay sheds fall within this category. The conversion of building(s) that are obtrusively located in the landscape or

⁶⁸ Technical Advice Note 23:Economic Development 2014, paragraph 3.2.1

otherwise not in keeping with their surroundings will not be encouraged. However, it is possible that in exceptional circumstances a modern utilitarian building may make a positive and important contribution to rural employment opportunities without detracting from the appearance of the landscape. Residential or serviced accommodation or holiday accommodation uses would be precluded in proposals for such buildings.

- 4.56 Where planning permission for holiday accommodation is granted this will be subject to conditions and/or a legal agreement to restrict the occupation of the building to holiday use preventing all year round occupancy by the same occupant.
- 4.57 The presence of a species protected under European or United Kingdom legislation is a material consideration in the planning process. Developers considering submitting a planning application must, at the early stages of the process, consider whether there are likely to be any habitats or species present on or near the site that could be affected by the development. Supplementary Planning Guidance will be prepared to assist.
- 4.58 Applications for conversion should contain all details of physical alterations necessary for the determination of the proposal. It may be necessary for the Authority to request a structural survey. For conversion to residential use a structural survey will be a requirement. Where the reuse of a complex of buildings is proposed the National Park Authority will expect an overall scheme for the site to be submitted and agreed by the National Park Authority in advance of applications for individual buildings being considered.
- 4.59 New Farm Buildings: Planning Policy Wales, Edition 9, November 2016 paragraph 7.6.5 advises that local planning authorities should adopt a constructive approach towards agricultural development proposals, especially those which are designed to meet the needs of changing farming practices or are necessary to achieve compliance with new environmental, hygiene or welfare legislation. This policy concerns proposals for new farm buildings must be clearly linked to a working agricultural unit which means agricultural land occupied as a unit for the purposes of agriculture including any dwelling or other building on that land which is occupied for the purposes of farming the land by the person who occupies the unit or any dwelling on that land occupied by a farm worker. Supplementary Planning Guidance on new farm buildings has will be prepared.
- 4.60 Agricultural Land: Planning Policy Wales Edition 9 November 2016 Paragraph 4.10.1 sets out national planning policy on the protection of agricultural land when considering development proposals.

Priority A: Special Qualities of the National Park

A. Special Qualities of the National Park

4.61 The special qualities of the National Park are those characteristics and features of the National Park which individually or in combination contribute to making this National Park unique. Work has been undertaken to refresh the Authority's understanding of those special qualities for the Management Plan⁶⁹. Those highlighted were:

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

4.62 The strategy is to ensure that development in the Park conserves and enhances those special qualities.

4.63 Even seemingly minor changes in the landscape can have an adverse effect and therefore attention to detail and the cumulative effects of change are important considerations.

4.64 The Authority will prepare Supplementary Planning Guidance on Landscape Character and Seascapes.

4.65 The Pembrokeshire Coast National Park is widely recognised as Britain's only predominantly coastal national park. The splendour of its coastline, the influence of the seascape, its spectacular scenery, and rugged, unspoilt beauty, provide a scenic quality which was recognised in its designation as a National Park along with the spectacle of the islands off the Pembrokeshire Coast. The geological resource is complex and a significant contributor to the natural beauty of the area. The varied landforms of the National Park are overlaid by millennia of activity by man forming a historic environment which is exceptionally rich and varied. Settlements, including urban areas, retain strong and distinctive character which encompass traditional and more formal architecture, and provide attractive places to visit. Tenby is dominated by Georgian architecture within the walled town, and planned medieval settlements are still evident at Newport and Angle along with their associated field patterns. Supplementary Planning Guidance on Conservation Areas will be prepared.

⁶⁹ Special Qualities of the National Park Background Paper

- 4.66 The Environment Act (Wales) 2016 introduced a new biodiversity duty (Section 6 Duty) to help reverse the decline and secure the long term resilience of biodiversity in Wales. Overall, in Wales diversity (in ecosystems) is declining which is shown by the loss of habitats and species. The 'extent' of some habitats has also declined significantly. 'Condition' shows mixed results, while connectivity has greatly reduced.⁷⁰ There is a wealth of important habitat and species within the National Park. Habitats and species within the National Park must be considered within the wider context of biodiversity and of conservation effort. The 2016 State of Wildlife in Pembrokeshire report suggests that biodiversity associated with agriculture are in decline. However where considerable effort has been made habitats and species are stable and improving.⁷¹ The Pembrokeshire Biodiversity Partnership enables organisations to work efficiently towards Wales-, UK- and European-level goals for wildlife, within the framework of the Biodiversity Action Plan for Pembrokeshire. The Authority will prepare Supplementary Planning Guidance on biodiversity which will include guidance on ecological resilience.
- 4.67 Pembrokeshire has a rich and diverse culture which has been shaped down through the centuries by waves of invaders and settlers. The accessibility of the Park is treasured where there is an ease of getting round and a range of activities freely available. A sense of tranquillity and remoteness is also highly valued amongst visitors to the area. This can include dark skies, free from light pollution.
- 4.68 The National Park's network of green infrastructure⁷² will be retained and enhanced to ensure that it supports natural and ecological processes and is integral to the health and quality of life of residents and visitors who are given an opportunity to interact with nature, and engage in recreation, sports and healthier lifestyles.

Policy 8 Special Qualities⁷³ (Strategy Policy)

The special qualities of the Pembrokeshire Coast National Park will be conserved and enhanced.

The priorities will be to ensure that:

- a) The sense of remoteness and tranquillity is not lost

⁷⁰ A summary of the State of Natural Resources Report Natural Resources Wales, September 2016, fifth page.

⁷¹ State of Wildlife in Pembrokeshire Report 2016

⁷² See 6. Glossary of Terms

⁷³ Chapter 13 Planning Policy Wales, Edition 9, November 2016 deals with how pollution issues should be addressed with any planning application. Paragraph 12.4.1 deals with the protection of water quality and the adequacy of supply. See Welsh Office Circular 10/99: Planning requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development.

- and is wherever possible enhanced (see Policy 9).
- b) The identity and character of towns and villages is not lost, through coalescence and ribboning of development or through the poor design and layout of development, and is wherever possible enhanced. The identification of Green Wedges will assist in achieving this priority.
 - c) The pattern and diversity of the landscape is protected and wherever possible enhanced (see Policy 15 and Policy 16).
 - d) The historic environment is protected and where possible enhanced⁷⁴ (see also Policy 15).
 - e) Development positively enhances the National Park's ecosystems and the components⁷⁵ that underpin them^{76 77 78 79}. The protection and enhancement of links between sites or the creation of links where sites have become isolated is of particular importance (see Policy 10, Policy 11, Policy 12, Policy 13 and Policy 30).
 - f) Development conserves and wherever possible enhances Geological Conservation Review⁸⁰ sites or any other important geological resource (see Policy 12).
 - g) Species and habitats are conserved and enhanced for their amenity, landscape and biodiversity value (see Policy 13).

⁷⁴ Chapter 6 Planning Policy Wales, Edition 9, November 2016 deals with conserving the Historic Environment. Welsh Office Circulars 60/96 'Planning and the Historic Environment: Archaeology', and 61/96 'Planning and the Historic Environment: Historic Buildings and Conservation Areas' provide guidance.

⁷⁵ Planning Policy Wales, Edition 9, November 2016, Welsh Government, Chapters 12 and 13.

⁷⁶ Includes Natura 2000 sites, Sites of Special Scientific Interest, National Nature Reserves and Marine Nature Reserves.

⁷⁷ The Water Framework Directive (WFD) (2000/60/EC) transposed through the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003.

⁷⁸ Natural Resources Policy, Welsh Government, page 10.

⁷⁹ Section 6 of the Environment (Wales) Act 2016.

⁸⁰ Geological Conservation Review [GCR]: the sites selected provide the basis of statutory geological and geomorphological site conservation in Britain. Regionally Important Geodiversity Sites [RIGS] are advisory designations.

- h) The Welsh language remains an important component in the social, cultural and economic life of many communities in the Park (see Policy 14).
- i) Development of the undeveloped coast is avoided and sites within stretches of the developed coast are protected for uses that need a coastal location (see Policy 18, Policy 19, Policy 34 and Policy 39).⁸¹
- j) The National Park's network of green infrastructure both new and existing is protected and enhanced (see Policy 10, Policy 11, Policy 12, Policy 13, and Policy 17).

In assessing the impact upon the special qualities of the National Park, matters of detail and cumulative impact will be given special consideration.

4.69 The policies and advice below provides additional guidance on protecting the National Park's special qualities.

Light Pollution

Policy 9 Light Pollution

Proposals that are likely to result in a significant level of lighting shall include a full lighting scheme and will be permitted:

- a) where the lighting proposed relates to its purpose; and,
- b) where there is no unacceptable adverse effect on the character of the area, local residents, vehicle users, pedestrians, biodiversity and the visibility of the night sky.

Wherever possible opportunities to mitigate potential cumulative impacts on the night sky should be explored.

4.70 Parts of the Pembrokeshire Coast National Park are still relatively undeveloped with minimal impact of lighting on the night sky. This policy is intended to conserve that and also to relate any lighting proposed to its purpose, such as site security or floodlighting recreational facilities, so that careful design and the use of appropriate means of lighting and lighting levels minimise the impact on adjoining areas. There is also a possibility

⁸¹ Planning Policy Wales, Edition 9, November 2016, paragraph 5.7.2 refers

that light pollution could adversely affect the integrity of a Natura 2000 site where development coincides with bat roost sites/transit routes. Opportunities may arise on land nearby in the same ownership to mitigate potential cumulative impacts. Proposals individually or cumulatively can have an unacceptable adverse effect. The Authority will prepare Supplementary Planning Guidance on lighting.

Biodiversity

- 4.71 The Environment (Wales) Act 2016 places a duty on public authorities to maintain and enhance biodiversity and to promote the resilience of ecosystems in the exercise of their functions. The Well-being of Future Generations (Wales) Act 2015 places a duty on public authorities to set and pursue objectives in the pursuit of the well-being goal to maintain and enhance a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change.
- 4.72 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on areas and sites and protected species with statutory nature conservation designation (including Sites of Special Scientific Interest, Special Protection Areas and Special Areas of Conservation).⁸² Please refer to Chapter 5 'Conserving and Improving Natural Heritage and the Coast'. Designated sites are identified on the Constraints Map⁸³. Technical Advice Note 5 Nature Conservation and Planning 2009 provides advice about how the land use planning system could contribute to protecting and enhancing biodiversity and geological conservation and should be read in conjunction with Planning Policy Wales, Edition 9, November 2016. Developments which might have the potential to affect European sites will be subject to Habitats Regulations Assessment and Environmental Impact Assessment at project level.

Policy 10 Sites and Species of European Importance

Development likely to have a significant effect on a European Site, when considered alone or in combination with other projects or plans will only be permitted where:

- a) The proposal is directly connected with or necessary for the protection, enhancement and positive management of the site for conservation purposes; or
- b) Following an appropriate assessment the proposal will not adversely affect the integrity of the site; or

⁸² See [6. Glossary of Terms](#).

⁸³ (see [page 9](#) of the Local Development Plan for more information)

- c) there is no alternative solution and there are reasons of overriding public interest and appropriate compensatory measures are secured.

Development likely to have an adverse effect on a European protected species will only be permitted where:

- a) there are reasons of overriding public interest;
- b) there is no satisfactory alternative; and
- c) the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their nature range.

Policy 11 Policy 11 Nationally Protected Sites and Species

Development likely to have an adverse effect either directly or indirectly on the conservation value of nationally protected sites will only be permitted where it is demonstrated that:

- a) There is no suitable alternative to the proposed development; and
- b) It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and
- c) Appropriate compensatory measures are secured; or
- d) The proposal contributes to the protection, enhancement or positive management of the site.

Development likely to have an adverse effect on nationally protected species will only be permitted where it is demonstrated that:

- a) The population range and distribution of the species will not be adversely impacted;
- b) There is no suitable alternative to the proposed development;
- c) The benefits of the development clearly outweigh the adverse impacts on the protected species; and
- d) Appropriate avoidance, mitigation and compensation measures are provided.

Policy 12 Local Sites of Nature Conservation or Geological Interest

Development that would cause an unacceptable adverse effect to the nature conservation value of a Local Nature Reserve or other site of local nature conservation interest, or the main features of interest within a Regionally Important Geodiversity Site will not be permitted. Opportunities for enhancement should be explored.

- 4.73 Local Sites of nature conservation interest may be formally recognised, such as Local Nature Reserves (shown on the Constraints Map), or may not be formally recognised but provide important nature conservation value. The value of a site may include its role as a wildlife corridor or as habitat such as unimproved grassland, coastal habitats and heath and moorland, as well as features such as road verges. It is not possible to identify such sites on the Proposals Map and this policy is intended to ensure that development which would harm the nature conservation value of a site provides appropriate steps to minimise, mitigate, compensate and provide new benefits.
- 4.74 The West Wales Biodiversity Information Centre holds a database of species records and habitat information, which it manages and disseminates to decision makers, conservation organisations and the general public on the occurrence and locations of EU and UK priority species and habitats, and those of Welsh and local importance in the region. The Local Records Centre records can be particularly useful at pre-application stage and the public are encouraged to contact the Centre before an application is submitted. The Authority will use the Local Records Centre to help establish whether there is local nature conservation interest at a development site. Where there is local nature conservation interest which would be significantly harmed by development, the Authority may require further information in the form of ecological surveys and will investigate options to minimise, mitigate, compensate or provide new benefits. The effects must be shown to be acceptably mitigated through careful design, work scheduling or other measures.
- 4.75 Regionally Important Geodiversity Sites are designated by Geoconservation Cymru – Wales. They are shown in the Plan's Constraint Map. Regionally Important Geodiversity Sites Supplementary Planning Guidance will be prepared identifying the location of these designated sites and the main features of interest identified in each designation.

Policy 13 Protection of Biodiversity

Development that would cause an unacceptable adverse effect to protected species or their habitats or the integrity of other habitats, sites or features of importance to wildlife and individual species will not be permitted. Opportunities for enhancement should be explored.

- 4.76 This policy aims to ensure that species and their habitats, including for example those identified in the Local Biodiversity Action Plan, are not harmed by proposed development. The effects must be shown to be acceptably mitigated through careful design, work scheduling or other measures. Opportunities to provide new benefits should also be explored. Please also see policies and guidance in the remainder of this section on Biodiversity.

Welsh Language

- 4.1 The Welsh Government's aims and ambitions for the Welsh language are set out in the Welsh Language Strategy – Cymraeg 2050. The strategy recognises the need to provide Welsh speakers with easily accessible opportunities to use their skills in social and work settings. The strategy also identifies the imperative need to create favourable circumstances to encourage the number of Welsh speakers. This involves securing goodwill towards the language and providing language infrastructure such as technology and legislation, but is also concerned with securing an economic and social future for Welsh speaking communities.
- 4.2 The future of the language across Wales will depend on a wide range of factors beyond the town and country planning system, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities. The planning system can contribute to the future wellbeing of the Welsh language, by establishing the conditions to allow sustainable communities to thrive. For example, creating conditions for well-paid employment opportunities and a range of quality housing options are integral to planning for sustainable communities.
- 4.3 The Background Paper on Welsh Language provides advice on the approach taken in Local Development Plan 2. The Sustainability Appraisal also provides an assessment of the impacts of proposals on the Welsh language in compliance with the Welsh Language Standards.
- 4.4 The Welsh language is part of the social and cultural fabric of the National Park. It is spoken by 19.2% of the population and others

have some knowledge of the language or are in the process of learning it, for example, through the increased provision of Welsh medium education in the County. There are substantial variations between the proportions of Welsh speakers in different communities. The Plan strategy recognises and protects the language as one of the Special Qualities (See Policy 8). The policy below will normally apply in Community and Town Council areas with 19.2% or more Welsh speaking population, as identified in the Census. For the purposes of this policy these areas are known as 'Welsh language-sensitive areas'.

- 4.5 Government advice on Welsh language issues is set out in Technical Advice Note 20 (October 2017) which states that the land use planning system should also take account of the needs and interests of the Welsh language and in so doing can contribute to its well-being.

Policy 14 Development in Welsh Language-Sensitive Areas

Unanticipated development proposals within the identified Welsh Language-Sensitive Areas (shown on the Proposals Map), which are considered likely to have a significant effect on the Welsh language will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language.

Development which would result in an unacceptable adverse effect on the Welsh language will not be permitted.

- 4.6 Mitigation measures can reduce or eliminate potential adverse impacts of development on the Welsh language. However, where development can reasonably be shown, on planning grounds, (for example, the scale of development proposed) to cause harm to the continued role and well-being of the Welsh language within that community, the National Park Authority will resist such development.
- 4.7 Technical Advice Note 20 Welsh Language October 2017 advises that adopted Local Development Plan policies will have already taken the needs and interests of the Welsh language into account, including the implications for windfall sites⁸⁴ for various types of development that comply with the Plan's policies. Neither these sites, nor sites allocated in the Plan should therefore be subject to a language impact assessment as this is already a requirement of the Plan preparation. Only large-scale development on windfall sites within the

⁸⁴ See [6. Glossary of Terms](#)

defined language-sensitive areas considered likely to have a significant effect on the Welsh language will require an assessment of the likely impact on the Welsh language to be undertaken. For the purposes of this policy 'large scale development' is 'major development' as defined in the 'Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (see Appendix 1 Land with Planning Permission or Development Consent Order for an explanation). The National Park Authority will be responsible for undertaking any assessment it considers is required and for determining its form.

- 4.8 The area is identified on the Proposals Map. As part of the Annual Monitoring Report the National Park Authority will consider if there has been any significant contextual change regarding the evidence base supporting this policy. The Authority will consider if changes are needed and whether this would require a selective review in advance of the 4-year formal requirement.
- 4.9 Mitigation measures may need to be applied to any permission either through conditions attached to a planning permission or through section 106 obligations. All section 106 obligations in relation to mitigating the impacts on the Welsh language which are considered necessary to make the development acceptable in planning terms and which are directly related to the development are required to comply with regulations. Potentially appropriate measures include phasing policies that complement the Local Development Plan's overall delivery trajectory.
- 4.10 This policy should not be interpreted as justifying development that would not otherwise be acceptable, solely on the grounds of contribution to safeguarding the Welsh language in the community. Welsh Government advises that policies must not seek to introduce any element of discrimination between individuals on the basis of their linguistic ability. Planning policies must not seek to control housing occupancy on linguistic grounds.⁸⁵

Historic Environment

- 4.11 Planning Policy Wales, Edition 9, November 2016, sets out clear statements of national development control policy on certain matters which is not repeated here. Please refer to Chapter 6 'the Historic Environment' of Planning Policy Wales, Edition 9 for:
 - a) the conservation of archaeological remains;
 - b) the preservation of listed buildings, optimum viable use and their demolition.
 - c) Development in a conservation area including demolition and trees. Conservation Area Supplementary Planning Guidance will be prepared. (shown on the Constraints Map).

⁸⁵ Paragraph 2.6.4 Technical Advice Note 20 Welsh Language 2017

- d) Protecting historic landscapes, parks or gardens and their setting. (Shown on the Constraints Map).
- e) Scheduled Ancient Monuments and archaeological remains (ancient monuments are shown on the Constraints Map);
- f) Enabling development, where substantial heritage benefits can outweigh other objectives of national or local planning policy.

4.12 Central to delivering the Welsh Government's objectives for the historic environment is the Historic Environment (Wales) Act 2016, which, together with its secondary legislation, new and updated planning policy and advice, seeks to improve the existing systems for the protection and management of the Welsh historic environment. As part of this package, Planning Policy Wales, Edition 9, November 2016 Chapter 6 'Conserving the Historic Environment' has been updated and a new Technical Advice Note 24 'The Historic Environment' and various best practice guidance documents will be produced.

4.13 In assessing the archaeological potential of a proposed development site information from the Historic Environment Record held by Dyfed Archaeological Trust will be taken into account. This record is officially recognised by the National Park Authority. The National Park Authority will prepare Supplementary Planning Guidance relating to the Historic Environment.

Policy 15 Protection of Buildings of Local Importance

Development affecting buildings which make an important contribution to the character and interest of the local area will be permitted where the distinctive appearance, architectural integrity or their settings are conserved and where possible enhanced.

4.14 The National Park is rich in buildings that are not listed but because of their vernacular architecture and construction are fundamental to the character and interest of the settlement or are important elements in the landscape.

4.15 The following criteria will be used for selection:

- a) degree to which the building remains in its original integrity;
- b) quality of the individual building's architecture;
- c) position and influence on the townscape or landscape;
- d) association with an important local figure or event.

4.16 When considering development proposals, the Authority will give due regard to the difference in status between buildings of local importance and those that are statutorily listed and, hence, the level of protection which they respectively attract.

Policy 16 Conservation and enhancement of the Pembrokeshire Coast National Park

Development will not be permitted where this would have an unacceptable adverse effect on the qualities and special landscape and seascape character of the Pembrokeshire Coast National Park including locally distinctive characteristics by:

- a) causing visual intrusion; and/or,
- b) introducing or intensifying a use which is incompatible with its location; and/or
- c) failing to harmonise with, or enhance the landform, landscape and seascape character of the National Park; and/or
- d) losing or failing to incorporate important traditional features.

In assessing the impact upon the National Park, matters of detail and cumulative impact will be given special consideration.

4.17 The purpose of this policy is to ensure that the qualities of the Pembrokeshire Coast National Park landscape are not lost to future generations. Policy 8 identifies the special qualities of the National Park. Planning Policy Wales, Edition 9, November 2016 paragraph 5.3.6 advises that National Parks must be afforded the highest status of protection from inappropriate developments. In National Parks, development plan policies and development management decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.

4.18 Landscape assessment encapsulates geology, landscape habitats, visual and sensory attributes, historic landscapes, cultural landscapes and public perception. A landscape character approach allows the recognition and enhancement of specific and valuable attributes across the National Park. Supplementary Planning Guidance on Landscape Character will be prepared. The guidance will identify areas of common landscape character, their special qualities, discernible landscape trends and management guidance. In many cases the landward boundary of the character area does not correspond with the National Park boundary, meaning that the same landscape character area continues into the administrative area of Pembrokeshire implying that sensitive areas of high value landscape may also lie outside the National Park. 28 landscape character areas

within the National Park have been identified in the Landscape Character Assessment prepared on behalf of the Authority.⁸⁶

- 4.19 44 Seascape character areas have also been identified in a Seascapes Character Assessment prepared on behalf of the Authority.⁸⁷ Each area can be described in terms of its key characteristics, physical influences, cultural influences and aesthetic, perceptual and experiential qualities. Its cultural benefits and service and key sensitivities are defined and the main forces for change affecting the area discussed. The Authority will prepare Supplementary Planning Guidance on Seascapes. The assessment includes territorial waters up to 12 nautical miles offshore and extends from Cardigan Island in the north to the Taf estuary in Carmarthen bay in the south. The study area reaches inland to include the areas of Milford Haven outside the Park, and up to the tidal limits of the Daugleddau.
- 4.20 Attention to detail and the cumulative effects of change are important considerations. Even seemingly minor changes in the landscape can have an adverse effect; prominent individual buildings or widespread application of inappropriate trends in design detailing can have an impact much wider than their immediate environs and cumulatively will subtly and irreparably alter the often fragile landscape character of the National Park.
- 4.21 Where there is a possibility that development, when either sited onshore or off shore, may cause significant visual intrusion, impacts should be assessed as applicable from:
- a) public access points;
 - b) the Coast Path (a National Trail);
 - c) Public Rights Of Way (as well as the public highway);
 - d) views on entering and leaving settlements;
 - e) views on entering and leaving the National Park itself;
 - f) the offshore islands;
 - g) waterborne craft on the Daugleddau and coastal waters;
 - h) important vantage points within settlements.
- 4.22 Particular attention should be given to medium and distant views, as well as the more obvious impacts on immediate environs and streetscape with special emphasis on the effects on the settings of Listed Buildings, Scheduled Ancient Monuments and Conservation Areas. The effect on the special historical interest of Historic landscapes, parks and gardens also requires careful consideration to safeguard these designations. The appearance of individual and groups of buildings, and settlements in their landscape settings, traditional building details and boundary treatment also need to be

⁸⁶ Background Paper: Landscape Character Assessment of the Pembrokeshire Coast National Park 2007

⁸⁷ Background Paper: Seascape Character Assessment of the Pembrokeshire Coast National Park April 2013

considered. Planting using native trees and shrubs, where appropriate, and landscaping can enhance and help to blend new development into its surroundings. This may help to balance in part the loss of original features.

- 4.23 Given the very restricted geographical extent of the National Park and its generally exposed coastal nature, any major or large-scale development is likely to sit uneasily in visual terms with the National Park's landscape and seascape. Development outside the National Park may have an impact on the qualities of the National Park and the National Park Authority will use the same principles as set out in Policy 16 when commenting on proposals outside of the National Park. Please also see 'Major Development', 'Nationally Significant Infrastructure Projects' and 'Developments of National Significance in Wales' in the next chapter.
- 4.24 Where a development would constitute the introduction or intensification of a use which is incompatible with the location, for example noisy activities in a relatively undisturbed location, such development would not be considered appropriate by the National Park Authority.

Open Space & Green Wedges

- 4.25 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on formal and informal open space, playing fields and green wedges. Please refer to Chapter 11 'Tourism, Sport and Recreation' and Chapter 4 'Planning for Sustainability'.
- 4.26 Areas of existing Open Space and Green Wedges are shown on the Proposals Map and will be protected from development in line with national planning policy. The Authority's Open Space Assessment was updated in 2016 and identifies the amount of recreational open space available in Centres and communities throughout the National Park. Based on the Fields in Trust standards of provision it also identifies where there are shortfalls of specific types of recreational space. The assessment of recreational open space will be used to identify where planning obligations will be required to provide for future needs as a consequence of additional development in communities. This includes requirements for the housing allocations set out in the Plan. Planning obligations cannot be used to make up existing shortfalls of provision. Where these exist the Authority will consider planning applications to provide additional facilities in appropriate locations.
- 4.27 Further details on the application of the open space standards will be provided in the Planning Obligations Supplementary Planning Guidance.

Policy 17 Open Space and Green Wedges



Existing Open Space and Green Wedges are shown on the Proposals Map.

Where new residential development generates a need, provision of open space or contributions towards off-site provision will be required (see also Policy 53).

4.28 Green Wedges play an important role in maintaining the landscape setting of urban and rural settlements, and in preserving openness. Pressures for development outside Centre Boundaries can result in an erosion of the openness and a detrimental effect on the character and special qualities of the rural National Park can result. Such development alone or cumulatively can have a detrimental impact on the character and landscape of the National Park and provides justification for the designation of Green Wedges as a local interpretation of national policy.

4.29 Planning Policy Wales, Edition 9, November 2016 paragraph 4.8.14 advises that when considering applications for planning permission in green wedges, a presumption against inappropriate development will apply. Local planning authorities should attach substantial weight to any harmful impact which a development would have on a green wedge.

Coast

4.30 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on the coast and coastal defence work. Please refer to Chapter 5 'Conserving and Improving Natural Heritage and the Coast'. Locations in coastal areas considered suitable for development are shown on the Proposals Map.

Policy 18 Shore Based Facilities

Development of shore based facilities including those linked to proposals below mean low water, will be permitted within the developed areas of the coast where compatible with adjacent uses subject to their being no unacceptable adverse effects.

Marina developments are not considered appropriate on the sensitive coast of the National Park.

- 4.31 This policy aims to protect the undeveloped, quiet stretches of coastline by directing development to those areas more suited in terms of maritime requirements, on-shore access, parking and other associated facilities.
- 4.32 There are a multitude of structures and buildings associated with the shore or harbour or mooring provision, either extending out into the water, such as jetties and slipways or associated with equipment beyond the mean low water mark. It is also possible within the Plan period that larger developments such as mineral exploration could operate off the Pembrokeshire coast, with implications for on-shore structures.
- 4.33 Policy 34 on Renewable Energy deals specifically with onshore connections to offshore renewable energy generators. It is accepted that technically feasible locations for such connections may need to be located on the undeveloped coastline. Other possible exceptions are the construction of lifeboat stations, landing stages/pontoons/slipways etc., work related to sewage treatment and sea defences.
- 4.34 Proposals will often share the waters with other users so it is important that no conflict or congestion will result from any development. Some uses along the coast are often seasonal in nature e.g. deck chair hire and ice cream sales. In such instances Policies Policy 8 and Policy 15 will be the primary policies used for the consideration of such proposals.
- 4.35 The Welsh Coastal Tourism Strategy published in December 2008 by the Welsh Assembly Government recommends expansion of the marina capacity outside this National Park. The National Park coast is for the greater part undeveloped and highly sensitive in landscape terms and often for nature conservation reasons too. Furthermore, although there are numerous small harbours around the coast, due to their tidal characteristics, access by boat is not possible for significant periods of the day. The works required to provide the sort of access and supporting developments which a successful marina would need would be substantial thereby increasing further the urbanisation of the location. See also Policy 19.
- 4.36 Consideration of 'unacceptable adverse effects' will include potential impacts on designated sites, such as Natura 2000 sites (see Policy 10).

Policy 19 Porthgain, Saundersfoot, Solva and Tenby Harbours

Development within the identified harbour areas as shown on the Proposals Map, will be permitted provided that:

- a) it sustains harbour activities; and
- b) it conserves or enhances the existing character of

the harbour; and
c) subject to there being no unacceptable adverse effects.

- 4.37 The aim of this policy is to ensure that the harbours at Tenby, Saundersfoot, Solva and Porthgain are viable in the long term. This includes the potential for the harbours to evolve to ensure that their long-term future is maintained. These harbours are identified on the Proposals Map.
- 4.38 When proposals are submitted in these harbour areas the Authority will request evidence with the application which will set out the relationship between the operation of the harbour business and the proposal and how the proposal will contribute positively to ensuring the long term viability of the harbour. This is what is meant by criterion a) of the policy. All development in harbours will require a flood consequence assessment.
- 4.39 Each of the harbours contributes to their locality. Proposals for development within the harbours will need to consider the needs of existing businesses and activities and ensure that new uses complement existing harbour uses. Tenby harbour provides the principal access to Caldey Island. Development proposals located in the harbour will need to ensure that access for the residents and businesses of Caldey Island is maintained. The Saundersfoot Regeneration Strategy is being developed (December 2016) as a community “place based” regeneration strategy plan for the waterfront.
- 4.40 Consideration of ‘unacceptable adverse effects’ will include potential impacts on designated sites, such as Natura 2000 sites (see Policy 10).

Priority B: Major development, the potential for growth

B. Major Development, the Potential for Growth

Major Development

- 4.41 Statutory designation does not necessarily prohibit development, but proposals for development must be carefully assessed for their effect on those natural heritage interests which the designation is intended to protect. In National Parks, special considerations apply to major development proposals which are more national⁸⁸ than local in character.
- 4.42 Planning Policy Wales, Edition 9, November 2016 Welsh Government, paragraph 5.5.6 sets out the actual test. Planning Policy Wales Edition 9 also sets out the tests for minerals proposals in National Parks (paragraph 14.3.2)

Nationally Significant Infrastructure Projects

- 4.43 The Planning Act 2008 defines what a Nationally Significant Infrastructure project is. The 2008 Act process, as amended by the Localism Act 2011, involves an examination of major proposals relating to energy, transport, water waste and waste water. Under the 2008 Act an application is made for a Development Consent Order (DCO) to the Planning Inspectorate. The Authority's role in the Examination is that of a statutory consultee and it is under a duty to submit a 'Local Impact Report' to the Examining Authority.
- 4.44 For Development Plan purposes the Examining Authority will expect the local planning authority to provide a comprehensive early assessment of all the main impacts. The Local Impact Report should set out the various development plans (including the status and relevant policies of each) and then give a clear assessment of impacts under different areas with a conclusion on each. It should also explain how the Development Consent Order or associated documents could be improved.
- 4.45 National Policy Statements (NPSs) are produced by the UK Government and decisions on Nationally Significant Infrastructure Projects are taken within the context of these statements.

Developments of National Significance in Wales

- 4.46 The statutory basis for the Development of National Significance ("DNS") process is provided in Part 5 of the Planning (Wales) Act 2015, which amends the Town and County Planning Act 1990 ("the Act"), and the Developments of National Significance (Procedure) (Wales) Order 2016 and subsequent Regulations.

⁸⁸ 'National' in this context means UK.

4.47 A full list of the types of developments covered by this can be found in The Developments of National Significance (Wales) Regulations 2016.

4.48 A Local Impact Report is also required for these types of proposals.

Ministry of Defence



4.49 The Ministry of Defence has advised that there are no plans for development of any significance in the Pembrokeshire estate in the foreseeable future (June 2016). Limited operational development on the ranges subject to mitigation measures can be permitted under normal planning policy and proposals for significant intensification or alteration of use or extensions to sites will have to be subject to the most rigorous examination and only permitted in exceptional circumstances under the 'Major Development Test'.

Hazardous Installations

4.50 No allocations for hazardous substances development or potentially polluting activities are proposed. The major development test will provide the primary policy context for the consideration of proposals for hazardous substances development.

Policy 20 Hazardous Installations

Development within safeguarding zones around hazardous installations will be permitted where there is no unacceptable risk to either:

- a) public health or safety; or
- b) the operation of the hazardous installations; and
- c) access to the hazardous installations.

4.51 This policy aims to ensure that public health or safety is not put at risk by development in proximity to sites using or storing hazardous substances. The Health and Safety Executive and Natural Resources Wales will be consulted on all planning applications within the safeguarding zone.

4.52 Their response will be used to assess whether or not there is a risk to public health or safety, the operation of the hazardous installation or access to it. The hazardous installations safeguarding zones established by the relevant safeguarding authority are shown on the Constraints Map.

Scale of Growth

- 4.53 The Pembrokeshire Coast National Park has increasingly been unable to accommodate demand due to landscape capacity⁸⁹ issues. Government policy asks the Authority to consider evidence such as population projections and capacity issues in determining the overall scale of growth.
- 4.54 Recent Development Plan Inquiries have endorsed the current approach of allowing development commensurate with the landscape capacity⁹⁰ of the National Park.
- 4.55 The approach overall ensures compliance with the Environment Act 1995 which requires compatibility with the National Park designation (See Policy 1 also).
- 4.56 Looking at development types in turn in terms of those most likely to impact strategically in terms of growth the approach does fit:
- a) Strategically in the Wales Spatial Plan larger growth areas (hubs) are designated outside the National Park. In terms of housing growth is not anticipated as a result of a declining population forecast. Focus is on enabling affordable housing delivery for the local population. Market housing is needed to cross subsidise delivery. Policy 47 and Policy 49 advises.
 - b) Employment provision is small scale (less than 2 hectares) as more strategic hubs are identified outside the National Park area consistent with the Wales Spatial Plan and the approach set out in neighbouring Local Development Plans.
 - c) The landscape sensitivity and capacity study for renewable energy has resulted in potential primarily for small scale developments. Some medium scale proposals may be possible also. There are extremely limited opportunities for large scale proposals. Policy 34 advises.
 - d) The Authority's landscape sensitivity and capacity study for camping and caravanning advises that there is a need to conserve existing unspoilt landscapes and seascapes and enhance existing caravan and camping sites, with limited or very limited opportunities for expansion or new sites – see Policy 42
 - e) National Planning policy advises that minerals development should not take place in National Parks save in exceptional circumstances (paragraph 14.3.2).

⁸⁹ See 6. Glossary of Terms.

⁹⁰ See 6. Glossary of Terms.

- f) National planning policy for **waste** acknowledges that facilities should predominantly serve the National Park area. – See Waste Background Paper.
- g) For coastal development national policy recommends the expansion of marina capacity outside the National Park (see the Welsh Coastal Tourism Strategy published in December 2008).
- h) For retail the strategy for Tenby, Saundersfoot, St Davids and Newport is to maintain their position relative to one another and larger centres outside the area. Despite leaking spend to centres outside the Park area they are performing well with the support of resident and visitor spend. It is proposed to encourage the sympathetic regeneration of these Centres so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities. The Regional Retail Study for South West Wales supports this approach with no need to allocate further retail opportunities. National policy and local criteria based policies to address proposals if received.

Policy 21	<p>Scale of Growth (Strategy Policy)</p> <p>Where compatible with the National Park designation:</p> <ul style="list-style-type: none"> a) The development of shore based facilities within the developed areas of the coast will be permitted. Marina development is not considered appropriate on this sensitive coast (see Policy 18). b) Provide for and or permit small scale employment proposals (see Policy 44).⁹¹ c) Provide for and or permit housing, to facilitate the delivery of affordable housing needs. In addition priority will be given to the delivery of affordable housing needs over other uses in certain circumstances⁹² (see Policy 7, Policy 41, Policy 45, Policy 47, Policy 48, Policy 49 and Policy 53). d) Permit waste facilities which predominantly serve the National Park (see Policy 28). e) Consider small scale renewable energy
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⁹¹ Less than 2 hectares.

⁹² See Introduction to Priority E Affordable Housing and Housing Provision

schemes favourably, with medium scale schemes offering some potential. Large scale opportunities are extremely limited (see Policy 34).

- f) Allow limited expansion of existing caravan and camping sites or the limited development of new sites (Policy 42).
- g) For retail it is proposed to encourage the sympathetic regeneration of Tenby, Saundersfoot, St Davids and Newport so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities.

Major development, including minerals development, will only be permitted in exceptional circumstances.^{93, 94}

Minerals

- 4.57 This National Park currently contributes to aggregate mineral extraction in relation to sand and gravel quarries and hard rock. National policy states that minerals development (which includes oil and gas) should not take place in National Parks save in exceptional circumstances⁹⁵. Exceptional circumstances can include over-riding national interest, or when significant overall benefits to the National Park can be demonstrated.
- 4.58 To justify new sites or extensions to existing sites within the National Park, it must be demonstrated that alternative resources, that would be environmentally acceptable for extraction are not available; the scope of meeting the need in some other way has been assessed and rejected; and that the detrimental effects of the proposal can be mitigated or compensated for.⁹⁶
- 4.59 Discussions continue to take place with neighbouring authorities (Pembrokeshire, Carmarthenshire, Ceredigion) about the possibility of output currently met from reserves within the National Park being sourced from outside. This approach is supported by the Regional Technical Statement for the North Wales and South Wales Regional

⁹³ Planning Policy Wales, Edition 9, November 2016, paragraph 5.5.6

⁹⁴ Planning Policy Wales Edition 9, November 2016, paragraph 14.3.2

⁹⁵ Planning Policy Wales Edition 9, November 2016, paragraph 14.3.2

⁹⁶ Minerals TAN1: Aggregates Welsh Assembly Government, March 2004, paragraph 52.

Aggregate Working Parties 1st Review, August 2014, which identifies a shortfall of 2.94 million tonnes of sand and gravel reserves to 2033 for the region.⁹⁷ Carmarthenshire County Council provided an update on progress made towards addressing this shortfall during the Examination of the Carmarthenshire County Council Local Development Plan. The Council identified that additional provision via the inclusion of subsequent planning permissions, two allocations within Ceredigion County Council's Local Development Plan and a dormant site within the region amounted to an additional 3.253 million tonnes being made available. It was resolved that the shortfall had therefore been addressed and no further allocations were required⁹⁸. The collective Authorities will, however, continue to look for new opportunities for provision outside of the National Park to improve resilience towards any future increase in demand. Minerals producers have been requested to provide input to aid the identification of new production sites as part of the South Wales Regional Aggregates Working Party's Annual Aggregates Survey for 2016. Safeguarding mineral resources and the identification of Areas of Search in other Local Development Plans will also assist this process.

- 4.60 There are no marine wharves within the National Park which bring marine aggregates into the area. Should acceptable proposals for wharves come forward at a future date, such wharves will be protected to safeguard sand and gravel routes into the area.
- 4.61 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development management policy on minerals in National Parks⁹⁹. Safeguarding Zones and Buffer Zones¹⁰⁰ are identified on the Proposals Map. The South Wales Coalfield extends west into Pembrokeshire becoming the Daugleddau Coalfield. It crosses the central belt of the National Park from Broad Haven to the west, across Hook in the centre and Saundersfoot in the east¹⁰¹.

Policy 22 Minerals Safeguarding

Resources of sand and gravel, limestone, sandstone, igneous rock and slate will be safeguarded as shown

⁹⁷ Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties 1st Review, August 2014.

⁹⁸ Carmarthenshire Local Development Plan 2006-2021: Inspector's Report, October 2014, paragraph 15.4.

⁹⁹ Planning Policy Wales, Edition 9, November 2016, Chapter 14 Minerals

¹⁰⁰ Minerals Planning Policy (Wales), Minerals Technical Advice Note (Wales) 1: Aggregates March 2004, paragraph 70 to 71.

¹⁰¹ Mineral Technical Advice Note 2: Coal, January 2009 confirms that National Designations of environmental or cultural importance (including National Parks) should be excluded from coal resource zones and mineral safeguarding zones.

on the proposals map.

Extraction of minerals before development which would otherwise sterilise mineral resources of current or likely future economic importance will be required, provided there is no suitable alternative location and an overriding need for the development, and extraction can be achieved:

- a) without prejudicing the proposed development; and
- b) by completing the extraction within a reasonable timescale; and
- c) without unacceptable adverse effects.

4.62 Minerals safeguarding is undertaken to ensure that mineral resources which may be required by future generations are not unnecessarily sterilised by permanent development. The Authority will take account of the presence of shallow or surface mineral resources in considering planning applications which would otherwise sterilise these resources. The identification of safeguarding areas on the proposals map for sand and gravel and hard rock (limestone, sandstone, igneous rock and slate collectively) does not identify areas where mineral working can take place, and gives no indication of the suitability of working or commercial quality of material. Any proposals for working would be subject to national and regional guidance and relevant planning policy and will need to provide sufficient details of the proposed site restoration including materials. Consideration of environmental impacts will include designated sites, such as Natura 2000¹⁰² sites and undesignated sites. The Authority will prepare Supplementary Planning Guidance on safeguarding minerals zones.

Policy 23 Development in Mineral Buffer Zones

Development proposals within buffer zones (see Proposals Map) will only be permitted where it can be demonstrated that:

- a) the mineral resource will not be sterilised; and
- b) the minerals operation will not have an unacceptable adverse effect on the development proposals.

¹⁰² See 6. Glossary of Terms

4.63 Buffer zones are defined in accordance with Planning Policy Wales, Edition 9, November 2016 (paragraph 14.4.1) and Minerals Technical Advice Note 1 Aggregates (paragraphs 70 and 71). The primary aim of the buffer zone is to protect the permitted or proposed mineral working from new sensitive uses such as residential developments or educational or health facilities, by establishing a separation distance between these potentially conflicting land uses. Buffer zones around active and inactive mineral extraction sites are shown on the proposals map for:

- Carew (Limestone, 200 metres)
- Pantgwyn (Sand and gravel, 100 metres)
- Penberry (Igneous, 200 metres)
- Rhyndaston (Igneous, 200 metres)
- Syke (Igneous, 200 metres)
- Trefigin (Sand and gravel, 100 metres)

Policy 24 Borrow Pits

Temporary planning permission will be granted for borrow pits where:

- a) the borrow pit is required to supply a specific short-term construction project with appropriate material; and
- b) extraction will cease upon completion of the construction scheme; and
- c) is closely located in relation to the proposed construction project; and
- d) there are clear environmental benefits from meeting need from the proposed source rather than from an existing site or sites with planning permission or from secondary or recycled aggregates either within or outside of the National Park; and
- e) the scale of the development is appropriate for the locality; and
- f) there is provision for a beneficial after-use, restoration, landscaping and post closure management of the site, including where possible details of progressive restoration of the site; and ^{103 104}

¹⁰³ See Minerals Technical Advice Note 1: Aggregates, paragraph 130-139, and Minerals Technical Advice Note 2: Coal, Appendix Q8 (page 126).

¹⁰⁴ See Planning Policy Wales, Edition 9, November 2016, paragraph 14.5.4.

g) development will not have unacceptable adverse effects.

- 4.64 It can be in the interests of a local area for a construction project to be supplied with materials from a locally derived source, avoiding the traffic generation and road movements with all the inherent problems associated with a remoter option. The term 'borrow pit' applies to a mineral working required to supply material for use solely for a specific short-term construction project.
- 4.65 The built environment is an important feature in the National Park and contributes to its special qualities. The term local, in this context means the National Park and immediately adjacent areas. Consideration of unacceptable adverse effects will include potential impacts on designated sites, such as Natura 2000 sites (Policy 10).
- 4.66 Of particular concern are the potential effects on the local landscape and environment, the amenity of neighbouring properties and local communities. Access and the capacity of the local road network, noise, vibration, dust and safety can raise concerns along with the potential to adversely affect existing surface and groundwater resources. Other relevant policies of the Plan will provide the appropriate policy context for considering these matters.

Policy 25 Local Building Stone

Planning permission will be granted for quarrying of local building stone where:

- a) the material is required to supply a specific proven local need and exceptional circumstances can be demonstrated; and
- b) it is closely located in relation to the proposed construction or development site; and
- c) there are clear environmental benefits from meeting supply from the proposed source rather than from an existing site or sites with planning permission or from secondary or recycled aggregates either within or outside of the National Park; and
- d) the scale of the development is appropriate for the locality and to serve the local market; and
- e) there is provision for a beneficial after-use, restoration, landscaping and post closure

management of the site, including where possible details of progressive restoration of the site.¹⁰⁵

- 4.67 Planning Policy Wales, Edition 9, November 2016 states that mineral working in National Parks should only take place in exceptional circumstances¹⁰⁶. In some cases this may relate to the need for small scale mineral extraction from local workings for building stone, which are not otherwise available and which can be extracted without unacceptable adverse effects. Of particular concern are the potential effects on the local landscape and environment, the amenity of neighbouring properties and local communities. Access and the capacity of the local road network, noise, vibration, dust and safety can raise concerns along with the potential to adversely affect existing surface and groundwater resources. Other relevant policies of the Plan will provide the appropriate policy context for considering these matters.
- 4.68 The use of locally derived building materials is supported so as to encourage the promotion of design quality which respects vernacular traditions. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.

Policy 26 Recycled, Secondary and Waste Materials

The use of recycled, secondary and waste materials, including demolition and construction waste arising from local sources will be supported provided:

- a) the removal of any material will not have an unacceptable adverse effect on any sites, buildings, walls or features of landscape, nature conservation, archaeological, architectural or historic interest; and
- b) the reuse of materials does not harm the character of the National Park; and
- c) the treatment of mineral waste can be satisfactorily accommodated within the mineral extraction site, including a suitable scheme for the restoration and after care of the site if appropriate.

¹⁰⁵ See Minerals Technical Advice Note 1, paragraph 130 to 139.

¹⁰⁶ Planning Policy Wales, Edition 9, November 2016, paragraph 14.3.2

- 4.69 The principle of recycling mineral materials from sites and their use as secondary aggregates is supported because this contributes to the sustainable use of mineral materials which are a finite resource. In cases where proposals involve the reworking of mineral waste which has been assimilated into and enhances the landscape or forms an area of archaeological interest, they will not be permitted.
- 4.70 Where processing needs to deal with waste arising from several sources a base location may be set up to deal with recyclable mineral wastes. Recycling plants may also be appropriate on working sites with planning permission for minerals extraction or mineral waste disposal. Crushing and screening operations can result in harm to the amenities of the surrounding area and these must be addressed and appropriate mitigation measures put in place.
- 4.71 It is recognised that there are 'permitted development' rights under the General Development Order 1995 in relation to minerals and in recognition of the potential environmental impact of such development the Authority will seek informal consultation arrangements with developers and operators over schemes falling outside formal planning approval procedures. Consultation will also take place with Natural Resources Wales. There are also environmental permits separate to the planning system that need to be considered.
- 4.72 Of particular concern for these forms of development are the potential effects on the local landscape and environment, the amenity of neighbouring properties and local communities. Access and the capacity of the local road network, noise, vibration, dust and safety can raise concerns along with the potential to adversely affect existing surface and groundwater resources. Other relevant policies of the Plan will provide the appropriate policy context for considering these matters.

Policy 27 Inactive Mineral Sites

Where the Authority is satisfied that the winning and working of minerals or the depositing of mineral waste has ceased permanently it will investigate the appropriateness of serving a Prohibition Order on the owner(s).

- 4.73 There is a single site within the National Park, Penberry, which has planning permission but which is unlikely to be re-opened. The Authority has submitted a Prohibition Order at Penberry for confirmation. This site is shown on the Proposals Map. The Authority will continue to investigate the appropriateness of making Prohibition Orders to provide certainty about future workings at any other appropriate sites during the plan period. Bottom Meadow and Middle

Mill quarries both have lapsed planning permissions but with remaining restoration requirements on which the Authority is holding discussions with the land owners. In considering what action to take the Authority will take into account likely benefits for the restoration of sites and appropriate after uses. In most cases, this will comprise the restoration, enhancement and management for nature conservation, for example creation and management of priority habitats.¹⁰⁷ Other sites that become inactive during the plan period will be kept under review to ensure high standards of environmental protection appropriate to the National Park are maintained.

- 4.74 The Authority will prepare Supplementary Planning Guidance on land instability arising from former coal mining working. Further information about land instability from natural processes and from other non-coal mining operations can be obtained from the British Geological Survey.¹⁰⁸ See paragraphs 13.9.1 to 13.9.2 of Planning Policy Wales, Edition 9, November 2016 which provides a national development control policy on unstable land.

Waste

- 4.75 Planning Policy Wales, Edition 9, November 2016, Technical Advice Note 21: Waste, Local Development Plans, Towards Zero Waste, and the Sector Plans, taken as a whole, comprise the overall waste management plan for Wales as required under European Union law, particularly Articles 1,4,13, 16, and 28 of the Waste Framework Directive¹⁰⁹. The Collections, Infrastructure and Markets Sector Plan and Technical Advice Note 21: Waste refers to the Areas of Search Maps for both in building and open air facilities to provide strategic locational criteria for sub regional waste management facilities¹¹⁰¹¹¹. These maps exclude the National Park as an appropriate location for providing such facilities¹¹². National guidance states that local planning authorities should seek to provide suitable and appropriate waste management facilities within their areas¹¹³. For the National Park, local scale facilities that would predominantly serve the National

¹⁰⁷ See The Environment (Wales) Act 2016, Section 7.

¹⁰⁸ See the British Geological Survey website.

¹⁰⁹ Technical Advice Note 21 Waste February 2014, paragraph 1.4

¹¹⁰ Collections Infrastructure and Markets Sector Plan, July 2012, Section 3 (q) 'Criteria for locating waste facilities' and Technical Advice Note 21 Waste, February 2014, paragraph 3.26

¹¹¹ Sub regional facilities are those which provide for more than one local authority area but not the whole region. The South West Wales region comprises Bridgend, Carmarthenshire, Ceredigion, Neath Port Talbot, Pembrokeshire and Swansea authorities.

¹¹² South West Wales Regional Waste Plan 1st Review, August 2008, Appendix J

¹¹³ Technical Advice Note 21 Waste, February 2014, paragraphs 3.21-3.22

Park area are considered appropriate and suitable in this respect¹¹⁴. Local facilities can include Community Recycling Centres (e.g. Bring Sites), Clean Materials Recovery Facilities, Transfer Stations, Civic Amenity, and Construction & Demolition Exemption¹¹⁵. Specific requirements for these or any other facilities have not been identified however. In addition to national policy and guidance future proposals will be considered against the relevant local criteria based policies. Regional Waste Planning Monitoring Reports for the South West Wales region will also be used to inform local planning decisions.

Policy 28 Local Waste Management Facilities¹¹⁶

Local waste management and recycling facilities which predominantly serve the National Park area will be permitted provided:

- a) the site would be conveniently located in relation to the needs of the National Park community; and
- b) the proposal makes provision for adequate screening so as to minimise any adverse effects; and
- c) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and

A Waste Planning Assessment will be required to accompany applications for a waste management facility classified as disposal, recovery or recycling facility.¹¹⁷

- 4.76 Civic amenity sites and related recycling centres serve a useful purpose in that household waste can be sorted to facilitate re-use and recycling. It also helps to avoid fly tipping. They may generate significant vehicle movements and will involve temporary storage of waste materials in open topped or closed (for putrescible waste) containers. For these reasons, the requirements with respect to access, parking and amenity are quite stringent. There are also environmental permits separate to the planning system that need to be considered.
- 4.77 The development should not have an unacceptable adverse effect on the amenities of the local area and local communities in particular

¹¹⁴ See Waste Background Paper

¹¹⁵ Construction and Demolition Exemption refers to sites which are registered as exempt from the Environmental Permitting Regulations and do not need to hold a licence.

¹¹⁶ See 6. Glossary of Terms

¹¹⁷ See Technical Advice Note 21 Waste (February 2014) paragraph 4.2.

with regard to access, traffic generated, noise, vibration, dust, litter, and odour nor adversely affect existing surface and groundwater resources. Other relevant policies of the Plan will provide the appropriate policy context for these considerations.

Policy 29 Composting

Proposals that involve the composting of organic material, generated predominantly within the National Park will be permitted unless there would be an unacceptable adverse effect on any of the following:

- a) the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, odour, safety nor adversely affect all existing surface and groundwater resources; and
- b) the capacity of the local road network; and
- c) designated conservation sites (see Policy 10 and Policy 11).

And provided:

- d) there is provision for landscaping and/or screening of the site; and
- e) there are satisfactory steps to deal with leachate; and
- f) the product has added value.

4.78 Composting is a sustainable process/treatment for the large amount of green waste produced in the National Park. However the product must be of a quality good enough for beneficial after-use.

4.79 The management of green waste may also include associated developments such as shredding. The collection and management of green waste is undertaken at the Civic Amenity sites and two landfill sites within the County. Composting also takes place at farms within the County; also there are community compost schemes.

4.80 The National Park Authority will support proposals for composting material predominantly generated within the National Park at or adjoining existing sites being used for waste management or disposal, which are operating with no associated environmental or other problems. Natural Resources Wales will be consulted. There are also environmental permits separate to the planning system that need to be considered.


4.81 It is likely that applications for windrow composting will be most suitable in rural locations.

Priority C: Climate change,
sustainable design, flooding,
sustainable energy

C. Climate Change, Sustainable Design, Renewable Energy, Flooding

- 4.82 The strategy of the Local Development Plan is to support sustainable locations for development by locating housing and other development adjacent to services. The strategy of this Local Development Plan is also to seek to minimise the contribution that certain developments¹¹⁸ will make to greenhouse gas emissions by constraining polluting or hazardous development in the Park (see paragraph 4.48), by promoting the use of renewable energy and by encouraging sustainable design in development. The strategy is also to accept the need to adapt to climate change and to deal with the consequences of climate change in a more forward thinking way, not for just the immediate Local Development Plan period.
- 4.83 At the end of the Local Development Plan period new development will be more sustainable in design. The Park will have a series of community based renewable energy projects as well as individual proposals in operation. In planning for the future changes in climate, no new development has been encouraged in locations where there is a long term strategy to allow the sea or river to inundate or flood. Development will have been directed away from areas that are or will be prone to flooding and inundation within the next 100 years using information supplied by Natural Resources Wales and the Shoreline Management Plans for West Wales and South Wales. As the climate changes there will be a need to understand and manage risks and consequences caused by flooding, including the implications for increased flood risk elsewhere caused by any particular development. New development will have been directed away from high risk locations allowing the undeveloped coastline to evolve naturally. Developed areas of the coast at risk from flooding and inundation caused by climate change will be assisted to manage the necessary changes to help communities minimise risk to life and assets and to adapt over time.
- 4.84 The strategy for development chosen along with the proposals under 'Sustainable Transport.' should also contribute to this agenda.

¹¹⁸ The main contributing sectors for CO₂ in the National Park are power station emissions, domestic and commercial combustion, road transport and other transport.

Policy 30 Sustainable Design (Strategy Policy) 

All proposals for development will be expected to demonstrate an integrated approach to design and construction, and will be required to be well designed in terms of:

- a) Place and local distinctiveness (see Policy 8).
- b) Environment and biodiversity (see Policy 8).
- c) Community cohesion and health (see Policy 31).
- d) Accessibility (see Policy 57).
- e) Energy use
- f) Energy generation (see Policy 34).
- g) Materials and resources (see Policy 32).
- h) Water and drainage (see Policy 33).
- i) Waste (see Policy 32).
- j) Resilience to climate change (see Policy 35)

4.85 Sustainable Design Guidance to help applicants to comply with the policy and explain what the Authority requires to accompany planning applications will be prepared. The integrated approach to design set out in the policy and guidance will encompass both design and construction phases of development and include any consequential updates in light of the Section 6 duty of the Environment Act (Wales) 2016.

4.86 The level of carbon reduction expected will be determined by the minimum required by Building Regulations (Part L). The National Park Authority, working within the context of Welsh Government policy guidance will expect all applicants to address carbon reduction within the designs for their schemes¹¹⁹.

4.87 The aim of this policy is to make more efficient use of water, through for example, rainwater harvesting, or employing a sustainable drainage system. There will however, still be a need for some drainage. To be well designed the development will still require adequate sewage disposal facilities and surface water draining. Capacity must be made available before the development can be occupied.

¹¹⁹ See Technical Advice Note 12 Design (March 2016) paragraphs 5.4.1-5.4.9

4.88 Criterion a) includes landscape and townscape. Criterion b) embraces historic landscape, geodiversity and biodiversity. Criterion c) includes “Secured by Design”, adaptability to changing circumstances, and neighbour amenity considerations. Applicants will be expected to demonstrate a design approach which minimises energy use. Applicants will be expected to incorporate appropriate renewable or low carbon energy technologies including solar water systems, solar photovoltaic, wind, heat pumps and biomass where appropriate. In respect of criterion h) early consultation with Natural Resources Wales should be undertaken to ensure that development is appropriately located, designed and/or phased to avoid adverse impacts on Natura 2000 sites in terms of water resource demands and water quality, and development will be permitted only where there are assured water supplies from sources that would not have an adverse effect on Natura 2000 sites. In exceptional circumstances it may be necessary to reduce the number of units on allocations where the only effective mitigation is to ensure no adverse effect on the integrity of Natura 2000 sites. Developments which might have the potential to affect European sites will be subject to Habitats Regulations Appraisal and Environmental Impact Assessment at project level. Water Cycle Studies (and surface water management plans) may also be necessary. Criterion i) includes waste minimisation and promotion/facilitation of recycling, in both the construction and operational phases. Criterion j) includes robustness to flooding, coastal risk and other pressures arising for climate change.

4.89 The policies below provide additional advice and guidance on addressing sustainable design issues.

Policy 31 Amenity

Development will not be permitted where it has an unacceptable adverse effect on amenity, particularly where:

- a) the development is for a use inappropriate to where people live or visit; and/or
- b) the development is of a scale incompatible with its surroundings; and/or
- c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse effect; and/or
- d) the development is visually intrusive.

4.90 This policy aims to protect the amenity enjoyed by people in their residences, workspaces and recreational areas. Amenity is defined as those elements in the appearance and layout of town and

countryside which make for a pleasant life rather than a mere existence. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable is likely to adversely affect amenity.

Policy 32 Minimising Waste

Development must minimise, re-use and recycle waste generated during demolition and construction and provide waste management facilities of an appropriate type and scale as an integral part of the development.

- 4.91 Demolition, construction and excavation wastes are a valuable resource of material that can be recycled, although minimisation of waste should be the first consideration. This Authority would welcome the provision of Site Waste Management Plans to help this process. Avoidance of this material going to landfill would comply with the Landfill Directive. There are a number of existing recycling facilities within the County. Local recycling facilities for this material are supported in accordance with the Government's sustainable principles for waste management and for mineral planning. Recycling, composting and other waste minimisation measures help the environment by reducing the amount of land required for waste disposal by landfill or landraising and for the treatment of residual waste, which is left over following maximum recycling and composting.
- 4.92 The Authority will expect proposals likely to generate significant amounts of waste to include facilities for "green waste" composting and for the collection of waste suitable for recycling, and for residual waste.
- 4.93 There are different types of recycling provision for different types of wastes. The very local provision for household and non-domestic wastes would be neighbourhood collection, which could either be from the doorstep, kerbside or from a central collection point. All waste generating developments should provide for the separate storage of types of waste including recycled, residual waste and food waste.

Policy 33 Surface Water Drainage

Development will be required to incorporate sustainable drainage systems for the disposal of surface water on site.

- 4.94 The disposal of surface water run-off from development both during construction and after completion requires careful consideration in order to minimise its adverse environmental impacts¹²⁰. Traditional practices for disposing of surface water involve channelling the water away to the nearest watercourse to promote rapid run-off. This approach can lead to an increased risk of flooding downstream, reduced groundwater recharge (a reduction in the water percolating through the soil back to ground water) and the transmission of pollutants to watercourses. Sustainable drainage systems are promoted by Dwr Cymru and supported by Natural Resources Wales. They move away from traditional piped drainage systems to engineering solutions that mimic natural processes and include hard options such as permeable and porous surfaces and/or softer options such as vegetated landscape features, ponds, wetlands and grass swales.
- 4.95 Sustainable urban drainage systems fall into 3 broad groups which aim to:
- a) reduce the quantity of runoff from the site (source control);
 - b) slow the velocity of runoff to allow settlement filtering and infiltration (permeable conveyance systems); and
 - c) provide passive treatment to collected surface water before discharge into groundwater or to a watercourse (end of pipe systems).
- 4.96 Planning applications must be accompanied by an assessment of the suitability of sustainable urban drainage systems.
- 4.97 Source control should be an integral part of the design of most new development and developers should seek to incorporate source control sustainable drainage systems within the application site for surface water disposal into development proposals at the time of application. This applies to all surface water within the site - from roofs, roads and other surfaces and planning conditions will be used to ensure compliance.
- 4.98 It is recognised that there may be exceptional circumstances where source control would not be wholly achievable and where this has been demonstrated not to be practicable, developers should in the first instance, provide sustainable drainage systems for as much of the development as is practically possible. For the remainder of the development an acceptable alternative means of surface water disposal must be incorporated. Traditional 'hard' drainage systems should only be utilised once it has been demonstrated to the satisfaction of the National Park Authority, that sustainable drainage systems would not be successful.

¹²⁰ Pembrokeshire County Council is the lead local flood authority for advising on surface water disposal for all new development and issuing Flood Defence Consent for works on non-main rivers.

4.99 The developer will be responsible for meeting all necessary costs for the planning, design and installation of sustainable drainage systems. Developers will also be required to enter into a planning obligation (known as a S106 Agreement) to meet the cost of adoption and providing long-term management. Natural Resources Wales does not support the inclusion of culverting and seeks the removal of culverting wherever possible. Pembrokeshire County Council, as consenting authority for ordinary watercourses, does not support culverting unless it is to achieve access into the land or property.

Renewable Energy

- 4.100 The policy framework for renewable energy below provides support for renewable energy proposals which take account of the Special Qualities of the National Park (see Policy 8).
- 4.101 Planning Policy Wales categorises four scales of renewable energy development based on output thresholds, 'Strategic' developments are over 25MW for onshore wind and over 50MW for all other technologies, 'Local Authority Wide' developments are between 5MW and 25MW for onshore wind and between 5MW and 50MW for all other technologies, 'Sub Local Authority' developments are between 50kW and 5MW and 'Micro' developments are below 50kW.¹²¹
- 4.102 Planning Policy Wales advises that local planning authorities can make a positive contribution, in pursuit of national renewable energy targets, by considering the contribution (target) their area can make towards developing and facilitating renewable and low carbon energy, and enable this contribution to be delivered¹²². It requires local planning authorities to undertake an assessment of the potential of all renewable energy resources and low carbon energy opportunities within their area and include appropriate policies in their development plans.
- 4.103 The Authority has conducted a Renewable Energy Assessment (updated January 2016)¹²³, which aims to obtain a clear overview on the contribution that the National Park area can make to national renewable energy provision targets, without compromising the national park purposes (see Policy 1). Specifically, the Assessment, as updated, considers the following:
- a) The technical potential for renewables
 - b) The potential environmental and socio-economic constraints
 - c) Taking account of a) and b) the resultant potential opportunities for a range of renewable energy
 - d) Taking account of the above, whether there is a need to update the landscape capacity assessments for each technology.
- 4.104 In respect of the Planning Policy Wales categories, the Renewable Energy Assessment (Jan 2016) identifies no opportunities for Strategic or Local Authority Wide scale development. Opportunities are identified for certain developments in the Sub Local Authority scale (up to 2MW for Anaerobic Digestion plants, up to 1MW Biomass facilities and typically 250kW for solar arrays). The majority of development opportunities for wind and hydro developments,

¹²¹ See Planning Policy Wales (Edition 9) November 2016 Figure 12.2 – Renewable and low carbon energy scales for planning purposes.

¹²² See Planning Policy Wales (Edition 9) November 2016 paragraph 12.8.9

¹²³ Renewable Energy Assessment (Jan 2016)

where not covered by permitted development rights¹²⁴, are identified in the Micro scale.

- 4.105 It is considered that, within each scale defined above in Planning Policy Wales, the landscape visual impact of renewable energy developments, depending on their type and capacity output, will vary greatly. Whilst the findings of the Renewable Energy Assessment identify opportunities at both the Micro and Sub Local Authority scale, in the case of Sub Local Authority scale these are concentrated at the lower end of the threshold. In respect of pursuing the National Park purposes (see Policy 1) and conserving the Special Qualities (see Policy 8), it is considered more appropriate in the context of the National Park landscape to apply a locally specific criteria of scale when considering renewable and low carbon technologies. This will enable a more accurate reflection of the development opportunities within the National Park area in terms of both potential generation and landscape capacity.

Policy 34 Renewable Energy (Strategy Policy)

Small scale renewable energy schemes will be considered favourably, subject to there being no unacceptable adverse effects. Medium scale schemes also offer some potential and will be permitted subject to the same considerations. Large scale renewable energy schemes will only be permitted where they do not compromise the special qualities of the National Park. Where there are other renewable energy schemes already in operation in the area, cumulative impacts will be an important consideration.

Onshore connections to off shore renewable energy generators will also be permitted subject to there being no unacceptable adverse effects. Developers requiring an undeveloped coastal location for onshore connections to offshore renewable energy installations will need to clearly justify this need in relation to Policy 8a) with the least obtrusive approach to design being taken (See also Policy 60).

¹²⁴ See The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2012 and The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2012 (No. 2).

4.106 For the purposes of this policy the table below provides guidance on the meaning of the terms small, medium and large for the following technology:

Table 1 Renewable Technology

Renewable Technology ¹²⁵	Very Small/ Micro	Small ¹²⁶	Medium	Large
Wind (values refer to blade tip height)	Building or mast mounted	<25m	25m-65m	>65m
Ground Mounted Solar Photovoltaic Arrays	< 1 hectare	1 - 2.9 hectares	3 – 4.9 hectares	> 5 hectares
Anaerobic Digestion Plants	Not applicable.	In the region of 10-50kW	Up to 2MW	Such facilities are likely to take waste from predominantly outside the National Park (see Policy 27).
Biomass Facilities	Not applicable.	<200kW	200kW – 1MW e.g. to power community facilities/public buildings	>1MW E.g. Heat and Electricity power plant
Hydro	<100kW	A few hundred KW	No technical potential	No technical potential
Heat Pumps	Not applicable.			

4.107 With regard to large anaerobic waste facilities Policy 27 Local Waste Management Facilities advises that facilities that predominantly serve the National Park will be permitted. Proposals for ground, water and air source heat pumps will be considered in the context of their individual impacts upon amenity and the environment.

4.108 Each form of renewable energy technology will have specific effects that will need to be taken into account when considering development proposals. For example, wind turbines can cause noise disturbance

¹²⁵ Informed by the Renewable Energy Assessment (Jan 2016 and the guidance contained within the Renewable Energy Supplementary Planning Guidance prepared under Local Development Plan 1.

¹²⁶ Reference in the policy to 'small' includes 'very small/micro'.

and shadow flicker, solar arrays can cause solar glare, anaerobic digestion plants can cause odour effects and additional traffic generation, and hydro schemes can impact upon the water environment and its associated ecology. This policy, in conjunction with other Local Development Plan policies as relevant, provides the policy context to consider all relevant effects of renewable energy proposals.

- 4.109 Likely contributions for renewable energy and carbon emissions are set out in the Renewable Energy Assessment (Jan 2016) and have been incorporated in the monitoring targets of the Local Development Plan (see 5. Monitoring).
- 4.110 Supplementary Planning Guidance on renewable energy and on assessing the cumulative impact of wind turbines on landscape and visual amenity will be prepared. The guidance on renewable energy will provide advice on solar panels, anaerobic digestion, biomass plants, micro-hydro provision, ground and air source heat pumps, district heating, wind energy and on-shore grid connectors for off shore wind installations. It will also include a landscape sensitivity assessment¹²⁷ for field scale solar photovoltaic development and wind turbines for each landscape character area (Policy 16) within the National Park.
- 4.111 There is also potential for offshore renewable energy developments which will have landward implications. As an exception to Policy 8a) the National Park Authority accepts that technically feasible routes for onshore connections may not only be available on the developed coast.¹²⁸ Innovative design solutions can often overcome the adverse impacts of normally incongruous development in such a sensitive landscape. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.
- 4.112 Please also see 'Nationally Significant Infrastructure Projects and 'Developments of National Significance in Wales'.

Flooding and Coastal Inundation

- 4.113 The strategy of the Local Development Plan accepts the need to adapt and deal with the consequences of climate change not just for the Plan period, but beyond. The coast is the most dynamic feature of the National Park changing daily, and climate change threatens to increase the rate at which the coast transforms, introducing challenges for communities to adapt to increased or new flood risks and coastal erosion.

¹²⁷ See 6. Glossary of Terms

¹²⁸ National planning policy advises that the undeveloped coast will rarely be the most appropriate location for development (Planning Policy Wales, Edition 9, November 2016, paragraph 5.7.2).

- 4.114 The entire Welsh and English coastline is included in a series of Shoreline Management Plans. These documents produced by Local Authorities along with other key stakeholders, and approved in Wales by the Welsh Government, provide an assessment of risks associated with coastal processes and present strategic policies for coastal management that balance the many and often competing aspirations of stakeholders with proper regard for economic and environmental sustainability over a 100 year timeframe. They include policy statements for discrete lengths or management units of the coast broken down into short, medium and long-term time bands. Two Shoreline Management Plans cover the coast of Pembrokeshire meeting at St Anne's Head near Dale.¹²⁹ These policy statements, combined with official sea-level rise data, have been used to define 'risk areas' and are shown on the Proposals Map as 'Coastal Change Management Areas'. The full methodology used to identify the areas is contained in the Coastal Change Management Areas Identification Methodology Background Paper.
- 4.115 The National Strategy for Flood and Coastal Erosion Risk Management¹³⁰ seeks to reduce risk to individuals, communities, business and the environment. Property and buildings and the finances invested in them have life-spans beyond a few generations of people.
- 4.116 A small number of residential properties, businesses, sections of road and other assets in the National Park could be lost to coastal erosion and coastal inundation before the end date of the Local Development Plan (2031) and beyond that time more extensive areas of coastline are forecasted to be subject to increased risk from flooding, erosion and change. Adaptation to such change needs long-term action, hence the need to consider and deal with the consequences beyond the Local Development Plan period. Development should not be allowed to take place in areas where erosion or coastal inundation is likely to occur during the lifetime of the building.
- 4.117 There will also be a need to help communities or individuals adapt to the consequences of coastal change, including in certain instances the need for the relocation and replacement of community facilities, commercial and business uses that are considered important to coastal communities, and of homes affected by coastal erosion. The potential for habitat creation and landscape restoration will need to be fully considered as part of any strategy to adapt affected areas.

¹²⁹ West of Wales Shoreline Management Plan & South Wales Shoreline Management Plan

¹³⁰ National Strategy for Flood and Coastal Erosion Risk Management 23rd May 2011

Policy 35 Flooding and Coastal Inundation (Strategy Policy)

In planning for the future development of the National Park;

- a) development will be directed away from those areas which are at risk from flooding now or as predicted for the future by TAN15 Development Advice Maps or Shoreline Management Plan 2¹³¹ unless there are sound social or economic justifications in accordance with the advice set out in Technical Advice Note 15 (see Policy 36, Policy 37 and Policy 38).
- b) sustainable defence of the coast will be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the relevant Shoreline Management Plan and there will be no unacceptable adverse effect on the environment.

4.118 New development will be expected to avoid unnecessary flood risk and to meet the requirements of Technical Advice Note 15 (Flooding). No highly vulnerable development (as defined in Technical Advice Note 15) will be permitted within Zone C2 and development will only be considered in areas at risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in Technical Advice Note 15.

¹³¹ The Development Advice Maps are to be used alongside Planning Policy Wales, Edition 9, November 2016 and Technical Advice Note 15 to direct new development in respect of flood risk. Together they form a precautionary framework to guide planning decisions. The maps are based on Natural Resources Wales extreme flood outlines (Zone C, data revised 2015) and the British Geological Survey drift data (Zone B, 2004). The Development Advice Maps do not include an allowance for climate change. More detail of the zones is identified in Technical Advice Note 15 (2004).

The Shoreline Management Plans identify areas liable to flood from the sea, with a long timescale. The data from these sources will be used to identify areas liable to flooding for the purposes of this policy. See West of Wales Shoreline Management Plan 2 for details of coastal policy from St Anne's Head to Poppit Sands. See South Wales Shoreline Management Plan 2 for details of coastal policy from Amroth to St Anne's Head.

4.119 Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites - see Policy 8 Special Qualities.

Policy 36

Development in the Coastal Change Management Area

New dwellings or conversion of existing buildings to residential use will not be permitted in the Coastal Change Management Areas (see Proposals Map).

Proposals for all other new development or the intensification of existing development or land uses in the Coastal Change Management Areas will be required to demonstrate that it will result in no increased risk to life or significant increase in risk to property, in addition to complying with all other relevant policies of the Local Development Plan.

4.120 In recognition of the risks, development within the 100 year coastal change risk areas needs to be carefully controlled.

4.121 The area seaward of the line on the Proposals Map indicates the area forecast to be affected by coastal change based on the output from the two Shoreline Management Plans for the long-term (up to 2110). Although there is uncertainty about absolute timescales in the Shoreline Management Plans, it is assumed that the management for each coastal frontage area will be achieved via delivery of the stated management policies. The Shoreline Management Plans identify policy statements and forecast shoreline position in three time intervals (epochs):

- a) up to 2025 (short-term);
- b) 2025 to 2055 (medium term); and
- c) 2055 to 2105 (long-term).

4.122 This breakdown provides valuable information allowing an assessment of when particular properties or land is likely to be at risk from coastal change. Areas shown in the Shoreline Management Plans as being at risk in the 1st epoch are those where there is currently no effective defence or where existing defences are likely to fail within the time-period. Within these areas only a limited range of types of development directly linked to the coast, such as deck-chair and surf-hire, would be acceptable and any permission will be time-limited in order to manage risk.

4.123 Acceptable development within the medium-term risk areas may include extensions and some householder development. In the long-

term risk areas a range of commercial and business proposals may be acceptable which can help to provide environmental, social and economic benefits for coastal communities. The potential for habitat creation and landscape restoration will need to be fully considered as part of any strategy to adapt affected areas.

4.124 All proposals will also be subject to other policies contained in the Local Development Plan

4.125 For the purposes of this policy 'dwellings' include those used for full-time residential use, for second or holiday home use and those with occupancy restrictions.

Policy 37	<p>Relocation of Existing Permanent Dwellings affected by Coastal Change</p> <p>Proposals for the relocation of existing permanent dwellings in the countryside affected by coastal change (see Proposals Map) will be permitted, provided that:</p> <ul style="list-style-type: none">a) The development replaces a permanent dwelling which is affected or threatened by erosion or tidal inundation within 20 years of the date of the proposal; andb) It is located an appropriate distance inland with regard to the Coastal Change Management Area and other information in the relevant Shoreline Management Plan and where possible it is in a location that is close to the coastal community from which it was displaced; andc) It is within or immediately adjacent to existing Centres close to the location from which it was displaced; ord) In the case of an agricultural dwelling, is within the farm holding or within or immediately adjacent to existing Centres; ande) The new dwelling is comparable in size to that which it is to replace;f) The existing site is cleared and made safe; andg) The site meets all other criteria against which a residential proposal would be judged.
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Policy 38	<p>Relocation and replacement of development (other than residential) affected by coastal change</p> <p>Proposals for the relocation and replacement of community facilities, commercial and business uses that are considered important to coastal communities affected by coastal change (see Proposals Map) will be permitted, provided that:</p> <ul style="list-style-type: none"> a) The proposed development replaces that which is forecast to be affected by erosion within 20 years of the date of the proposal; and b) The new development is located an appropriate distance inland with regard to the Coastal Change Management Area and other information in the relevant Shoreline Management Plan and where possible it is in a location that is close to the coastal community from which it was displaced; and c) The new building or land area is comparable in size to that which it is to replace; and c) The existing site is either cleared and made safe or put to a temporary use beneficial to the local community; and d) The site meets all other criteria against which a proposal for these uses would normally be judged.
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4.126 Twenty years is the timescale that Government guidance states (for the purposes of Shoreline Management Plans) as the 'present time' or 'short-term'. It is used in all Shoreline Management Plans to define Epoch 1. There is a need to balance blight with the ability of property owners within the risk areas to adapt or respond to the coastal changes.

Priority D: Visitor economy, employment

D. Visitor Economy, Employment

Visitor Accommodation, Attractions, Leisure Activities and Recreation

- 4.127 The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance. This is best achieved in land use terms by not adding substantively to the overall provision of visitor accommodation, as this could encourage further 'peaking' and cause damage to the National Park landscape and special qualities, both in terms of the impacts of the additional development and increased activity in some 'hot spot' locations.
- 4.128 Instead, the future for the National Park in this Local Development Plan is one where by the end of the Plan period, a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained to suit a range of incomes. Some additional caravan and camping provision is provided for along with changes within sites which allows for more innovative approaches to provision to be considered. Hotels and guest houses that can provide accommodation and employment all year round are provided for and safeguarded unless they are no longer viable. Some additional self-catering is allowed to cater for all year round needs but this is restricted to instances where there is not a priority to meet affordable housing needs.
- 4.129 Where new visitor related development (visitor attractions, recreational and leisure development and shore based facilities associated with offshore jetties etc.), is permitted it has been screened to avoid activities that would damage the special qualities the Park.¹³² The development of a few all-weather attractions has helped encourage more visits out of the peak season.
- 4.130 Traffic generation from visitor traffic is potentially a significant concern. A more rigorous approach to assessing traffic impact for such developments is required. Proposals that causing significant adverse impacts that cannot be mitigated are not permitted – see Policy 57 and Policy 58.
- 4.131 Supplementary Planning Guidance will be prepared to provide further advice on what would be inappropriate activities in the National Park.

¹³² Inappropriate activities would be those that would damage the enjoyment of the special qualities of the National Park and this damage cannot be mitigated for example through zoning or traffic management measures or seasonally restricted activities.



To attract visitors outside the peak season while ensuring that the National Park environment is conserved and enhanced as a landscape of national and international importance by:

- a) Allowing limited caravan, camping and chalet development (see Policy 42).
- b) Permitting new hotels and guest houses within Centres or through the conversion of appropriate existing buildings¹³³ in the countryside.
- c) Protecting against the loss of hotels and guest houses unless it is proven that their continued use would not be viable or that peak demand can continue to be met in the locality(see Policy 40).
- d) Only permitting self-catering accommodation where the site or building is not appropriate for market or affordable housing provision on brownfield sites in the Local Development Plan's Centres or in conversions in the countryside(see Policy 41).
- e) Permitting visitor attractions, recreational and leisure activities in or adjacent to Centres. Proposals in the countryside will need to demonstrate why a 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.
- f) Directing shore based facilities¹³⁴ to the developed stretches of coast where compatible with adjacent uses (see Policy 18).

Activities which would damage the special qualities

¹³³ For definition of appropriate buildings in the countryside, please refer to the reasoned justification under Policy 7, Countryside of the Plan.

¹³⁴ Structures and buildings associated with the shore or harbour or mooring provision or associated with equipment beyond the mean low water mark.

of the National Park will not be permitted (see also Policy 8). Proposals under this policy which might represent a threat to any sites and species of European importance will not be permitted (see Policy 10).

- 4.132 There may be opportunities to develop hotels and guest houses within Centres, through new build developments, redevelopments or conversion of existing buildings. Outside of Centres, opportunities for new hotels and guest houses may be achieved through the conversion of appropriate buildings (see Policy 7d).
- 4.133 The policies below provide additional advice and guidance on the visitor economy.

Policy 40 Loss of Hotels and Guest Houses



Loss of hotels and guest houses in the National Park will be permitted where:

- a) the potential for continued use of the facility has been shown to be unviable; or
- b) the overall demand for this type of accommodation during peak periods will continue to be met within the area; and
- c) there is no unacceptable adverse effect on the appeal and intrinsic character of the resort, area or frontage.

Applicants justifying the loss of the hotel under criterion a) will need to show that a genuine marketing exercise has been undertaken prior to the submission of the application.

- 4.134 This policy aims to protect the existing stock of hotels and guest houses in the National Park. A good supply and range of serviced accommodation is essential, particularly as tourism is a dominant factor in Pembrokeshire's economy. As the holiday market has changed there has been sustained pressure to convert hotels and large guest houses to flats, apartments and private houses. Since 1990, there has been a loss of over 40 hotels within the National Park. This trend has slowed and since 2010 a small number of new hotels have been developed in the National Park.
- 4.135 Hotels and guest houses often form part of the appeal and character of a town, village or area, which helps to attract visitors. In some instances, such as the Esplanade in Tenby, they form an intrinsic

element of the identity of a particular frontage. Larger hotels also often form important landmarks in the townscape or landscape.

- 4.136 It is acknowledged that the demand for different types of holiday accommodation will continue to change and this is acknowledged in the policy which allows the change of use of those premises which are no longer viable and have no realistic prospect of becoming viable.
- 4.137 Supplementary Planning Guidance on the loss of hotels will be prepared.

Policy 41 Self-Catering Development



Proposals for self-catering development will only be permitted on a brownfield site in a Centre¹³⁵ or in a conversion proposal in a countryside location (see Policy 7 and Policy 49) where the site or building must be shown to be inappropriate for market or affordable housing provision.

New build self-catering development on greenfield sites will not be permitted.

- 4.138 Self-catering accommodation is defined as non-caravan self-catering accommodation including rented flats, cottages, houses and bungalows, the primary purpose of which is for holiday letting.
- 4.139 This category would also include hostels providing low-priced overnight accommodation with a large proportion of dormitory accommodation, self-catering and facilities related to outdoor activities or field study. Hostels providing catering services will be regarded as serviced accommodation.
- 4.140 Purpose-built self-catering units may help to take the pressure off using local housing for holiday accommodation. However, a balance needs to be struck and given the large number of holiday properties currently in the National Park, the Authority will seek to prioritise the provision of affordable housing over self-catering accommodation where such opportunities arise. In principle all new market housing (this is private housing for sale or rent where the price is set in the open market and their occupation is not subject to control by the local planning authority) can contribute to meeting the need for affordable housing.¹³⁶

¹³⁵ See [6. Glossary of Terms](#)

¹³⁶ Paragraphs 9.2.14 and 9.2.16 Planning Policy Wales, Edition 9, November 2016

- 4.141 Where self-catering is permitted planning conditions will ensure facilities remain as units of holiday accommodation and are not occupied as a sole or primary residence. The term 'inappropriate' in policy wording refers to instances where amenity issues may arise for example from having full time residential development adjacent to or within an existing holiday complex.
- 4.142 This policy will be used to consider both new build and conversion to self-catering accommodation.

Caravan, Camping and Chalet Development

- 4.143 The Caravan, Camping and Chalet policy below is supported by a Caravan, Camping and Chalet Capacity Assessment (November 2015)¹³⁷, which was a systematic assessment of the capacity of existing 28 Landscape Character Areas¹³⁸ to accommodate a range of different types of caravan, camping and chalet developments including emerging types of accommodation. It also provided advice on a Landscape Character Area basis as to whether existing sites can be upgraded, extended to increase accommodation, extended to improve appearance and/or whether new sites can be accommodated.
- 4.144 The findings of the landscape sensitivity and capacity study suggest that there is potential for certain limited scales and types of development in some areas whilst maintaining a policy of restraint elsewhere.
- 4.145 The changing patterns of use from touring units to static units and the introduction of new types of leisure accommodation including 'glamping' indicate that the character of this development type is changing and is likely to continue to change. It is not possible to predict how the sector and different types of accommodation will evolve or how popular they will remain. Therefore policies are based on core principles and differentiate between the relative scale and permanence of development i.e. the difference between static units that are present all year round development and touring units, present for part of the season.
- 4.146 The Authority will prepare Supplementary Planning Guidance based on the Caravan, Camping and Chalet Landscape Capacity Assessment Background Paper.

¹³⁷ Background Paper: Caravan, Camping and Chalet Capacity Assessment (November 2015)

¹³⁸ Background Paper: The Study relied upon the Landscape Character Assessment of the National Park. The Landscape Character Assessment identifies 28 character areas within the National Park.



New Caravan, Camping and Chalet sites and changes of accommodation within existing sites will be considered away from the coast and Preselis and in locations not intervisible¹⁴⁰ with them.

Extensions to existing sites will be considered where the extension is in a well-screened location.

Extensions to existing sites with no increase in pitch numbers to achieve clear environmental improvement in relation to landscaping and layout will be permitted where existing sites have highly prominent parts, often visible from the coast and inshore waters, and where extensions allow pitches to be transferred to more discreet locations.

Proposals coming forward as set out above must ensure:

- a) New development (including ancillary facilities) and changes within sites avoid sensitive locations and units are sited so that they can be readily assimilated into the landscape without causing an unacceptable adverse effect on the National Park landscape (see Policy 16).
- b) There are no unacceptable adverse cumulative effects when considered in conjunction with other development in the locality (see Policy 16).
- c) Any ancillary facilities should, wherever possible, be located in an existing building or as an extension to existing facilities. If no existing building is available the need for additional facilities must be clearly demonstrated and commensurate with the scale of development (see also Policy 40).
- d) Enhancement opportunities achieve an overall environmental improvement whereby there are

¹³⁹ This includes glamping. See reasoned justification for definitions.

¹⁴⁰ See 6. Glossary of Terms

clear benefits in reducing the impact on the surrounding landscape.

- 4.147 The Caravan, Camping and Chalet Landscape Capacity Assessment provides both generic and detailed advice on what is meant by terms such as ‘away from the coast and Preselis’ and ‘sensitive locations’, how to assimilate proposals into the landscape and how to mitigate and enhance. The tailored recommendations and guidance for each landscape character area takes precedence over the generic guidance on siting, mitigation and enhancement which is set out in Appendix B to the Assessment.
- 4.148 Opportunities for new sites and extensions to existing sites are generally small-scale, catering for seasonal touring caravan or camping pitches. There may be a very small number of opportunities for medium scale proposals. Opportunities for new large-scale static sites were not found. The table below sets out what is meant by site size (small, medium large) and what is meant by the terms (seasonal or static). Size thresholds were derived from a preliminary assessment of a sample of different developments in the Pembrokeshire landscape taking into account the scale and pattern of the landscape.

Table 2 Definition of Different Types of Development

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

Type of development and site size	Definition
small	tepees and safari tents 0- 0.5Ha.

- 4.149 The definition of touring units includes touring caravans, tents, trailer tents and motor-caravans, motorhomes, touring vans and campervans.
- 4.150 Glamping is defined as a form of accommodation which has been pre-erected on-site and can include yurts, tepees, pods, tree-houses and safari tents, although it can be provided by a range of other structures. The degree of locational permanence, scale and design will determine how these structures are considered.
- 4.151 Soft 'glamping' options such as yurts, tepees, safari tents and bell tents will be treated as touring units or seasonal development provided they are removed from site when they are not in use and/or for the majority of the year and the site allowed to grass over. Where associated fixed infrastructure such as decking, fencing or solar panels is proposed, the tents may be considered the same as static caravan development. Each proposal will be considered on a case-by-case basis¹⁴¹.
- 4.152 Hard 'glamping' options such as pods or wooden tents or other hard structures may be considered to be the same as touring or static caravans or lodges in accordance with the statutory definition of a caravan in Appendix C of the Caravan, Camping and Chalet Landscape Assessment. This depends on whether the structure can be removed easily off site in one piece, if it has a permanent concrete base, is permanently connected to an electrical supply or to other services such as water and waste disposal or has ancillary structures such as decking, fencing or solar panels associated with it. The decision on its status will be made on a case-by-case basis.¹⁴²
- 4.153 Touring units should be removed from site when not in use. Storage for touring units should preferably be in suitable existing buildings or, in some limited circumstances in well screened, unobtrusive sites not visible from publicly accessible areas on land or sea.
- 4.154 Cumulative Impacts: In considering cumulative impacts a key principle to be applied is that if a particular type of development at a particular scale is acceptable in a given landscape character area this does not mean that, if implemented, that it would be appropriate or acceptable to increase the size or intensify the use of the site in future. The sensitivity of the Landscape Character Area would be

¹⁴¹ See 6. Glossary of Terms

¹⁴² See 6. Glossary of Terms

likely to stay the same and the capacity may reduce in order to safeguard and meet the National Park's special qualities and purposes.

- 4.155 Conditions: A condition preventing year-round occupancy will be included on any permission granted. Seasonal use will usually be limited from beginning of May to end of September.
- 4.156 This policy excludes caravanning and camping permitted by the '28-day rule'¹⁴³, and sites operated under Certificates granted by Exempted Organisations.¹⁴⁴

Policy 43 Site Facilities on Camping, Chalet and Caravan Sites
Development of retail and other facilities on camping, chalet and caravan sites will be permitted where:

- a) it can be demonstrated that the facility is not already available in the vicinity; and the scale and design of the facility is in keeping with the character of the surrounding area; and
- b) the vitality and viability of retailing and services of nearby Centres are not adversely affected.

- 4.157 It is accepted that chalet, caravan and camping sites generally require good quality washing and toilet facilities. In addition larger caravan and chalet sites may justify, for example, the provision of a camp shop, office, laundry facility or games room. Wherever possible such provision should be made by the adaptation or conversion of existing buildings although it is acknowledged that new buildings will be required in some instances. The provision of catering, leisure or shopping facilities on a scale that exceeds the reasonable requirements of the occupiers of the site or which relates poorly to the size, character or location of the site will not be encouraged. Facilities of a larger size and scale may be considered in circumstances where such facilities are lacking in the immediate locality. The transformation of sites into self-contained holiday complexes providing extensive and inappropriate leisure or shopping facilities will be resisted. A balance must therefore be achieved between the need

¹⁴³ Schedule 2, Part 4, Class A of the General Permitted Development Order allows the use of land for various purposes – including the 'stationing of tents' for up to 28 days in any calendar year.

¹⁴⁴ The Caravan Sites and Control of Development Act 1960 gives certain organisations the right to allow landowners to establish small campsites on their land without the need for planning permission. Such sites can accommodate up to five caravans and motorhomes and up to 10 tents, space permitting.

to maintain or improve the quality of facilities on site (having regard to site licensing requirements), and the need to safeguard existing facilities of nearby Centres.

- 4.158 On small sites in particular, the development of facilities in excess of those required by the licensing authority will be resisted. The provision of facilities under this policy will be expected to be accommodated within the confines of the existing site. In most instances, particularly in countryside locations, it will be appropriate to impose conditions on the grant of permission for such facilities to restrict their use to persons residing at the site. Such conditions will ensure that the scale of facilities remain appropriate for their intended purpose and will prevent undermining the vitality and viability of local facilities.

Employment

- 4.159 Pembrokeshire's economy reflects its peripheral location. Whilst there are a small number of large employers in the energy and service sectors the County relies on small and medium-sized enterprises to drive its economy, with over 94% of registered businesses employing fewer than 10 people. 12% of the workforce are self-employed.
- 4.160 Most of the people who work in Pembrokeshire also live in Pembrokeshire and this correlation is particularly strong within the National Park.¹⁴⁵ The largest employers attracting people living outside of the immediate areas are located outside the National Park and mostly centred around the Haven Waterway and Haverfordwest. 9% of people who travel to work commute to Carmarthenshire (5%) and Ceredigion (4%). There is also a larger than Wales and UK average number of people self-employed in Pembrokeshire.
- 4.161 In line with the Wales Spatial Plan, strategic employment provision in Pembrokeshire lies in the County Council's planning jurisdiction where strategic sites in the Council's Local Development Plan, in particular on the Haven waterway, provide opportunities for employment growth close to the main centres of population. Small employment land allocations in the National Park Authority's planning jurisdiction have not been delivered (viability and lack of developer interest are the two main issues) in the first Local Development Plan and the intention through revision is to respond to uncertainty by considering a more flexible approach through a criteria based policy approach.¹⁴⁶
- 4.162 In terms of accommodating business in Pembrokeshire as a whole, demand is for ready-built premises, rather than land. There is a need to ensure a sufficient supply of smaller industrial units of up to 1,750 sq. feet for start ups and small firms and larger inward investors (c. 10,000). Locations identified are Haverfordwest, the Haven and

¹⁴⁵ See Background Paper on Employment for further information.

¹⁴⁶ See Background Paper on Employment for further information.

Fishguard and north Pembrokeshire.¹⁴⁷ It is acknowledged that public sector provision of business premises has ceased and therefore ensuring a sufficient supply of office and business premises will now rely on engagement with the private sector to identify sites and opportunities.

- 4.163 The strategy for employment generation is to allow for small scale provision in the Park to enhance the socio-economic well-being of Park communities and also to help tackle seasonality issues with employment in the area. Large scale proposals are not considered compatible with the National Park designation. Small scale employment development is seen as development involving less than 2 hectares of land for business, general industrial or storage and distribution. This is complemented by additional policies for range of employment related uses (Policy 7 Countryside Policy 19 Porthgain, Saundersfoot, Solva and Tenby Harbours, Policy 24 Borrow Pits, Policy 25 Local Building Stone, Policy 28 Local Waste Management Facilities, Policy 34 Renewable Energy, Policy 39 Visitor Economy, Policy 46 Farm Diversification, Policy 52 One Planet Development, Policy 54 Retail in the National Park, Policy 60 Telecommunications and Policy 61 Powerlines and Pipelines).
- 4.164 To avoid significant trip generation the locations promoted are generally those where homes, shops and services are located or proposed to be located. The Plan does, however, recognise that extensions to established businesses in the countryside are sometimes needed along with the need for new businesses needing to join existing clusters. Assessing traffic impacts will be required. Those that cause significant adverse effects that cannot be mitigated will not permitted(see Policy 57 and Policy 58).
- 4.165 At the end of the Local Development Plan period it is envisaged that small scale employment sites have been unlocked and are being developed in some of the larger Centres in the Park. Employment uses have also been generated outside these areas. Many sites that have been in employment use for some time are still available for new users. Each harbour in the National Park continues to contribute positively both to employment in and the character of the area.

Policy 44 Employment Sites and Live/Work Units (Strategy Policy) ★

Employment opportunities will be provided and safeguarded through:

- a) Directing small-scale employment proposals to appropriate locations in or adjacent to the Local Development Plan's identified Centres or buildings suitable for conversion in the countryside (see Policy

¹⁴⁷ page 46, Pembrokeshire County Council Economic Development Strategy and Action Plan 2017- 2022

7d). Farm diversification can also assist (see Policy 46).

- b) Allowing rural enterprises in the countryside where a need to locate in a 'Countryside' location is demonstrated to be essential. Rural enterprises should make use of existing buildings whenever possible.
- c) Allowing extensions to established businesses and giving favourable consideration to new businesses aiming to join existing clusters in the countryside.
- d) Combining business uses with other uses such as community facilities or housing including live/work units.
- e) Protecting existing employment sites for employment use except in locations where the current use is not suited to the area or there is adequate provision already or the existing use is unviable. When considering a new use for a redundant employment site a community facility or market/affordable housing provision will be given priority(see Policy 45).
- f) Protecting and enhancing the harbours at Tenby, Saundersfoot, Solva and Porthgain (see Policy 19).

- 4.166 The term 'clusters' in criterion c) above means two or more B class uses sited adjacent to each other where the joining B class use demonstrates how it will derive benefit from co-locating.
- 4.167 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on employment developments in rural areas. Please refer to Chapter 7 'Supporting the Economy'. Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010) and Technical Advice Note 23, Economic Development February 2014 – Planning for Sustainable Rural Communities (2010) also provides detailed guidance.
- 4.168 The term 'rural enterprises' in criterion b) comprise land related businesses including agriculture, forestry and other activities that obtain their primary inputs from the site, such as the processing of agricultural, forestry and mineral products together with land management activities and support services (including agricultural contracting).
- 4.169 The following policy and advice provide additional guidance on protecting employment sites.

Policy 45	<p>Protection of Employment Sites and Buildings</p> <p>Permission to redevelop, or use, business, general industrial, storage or distribution sites or buildings for other purposes will be permitted where:</p> <ul style="list-style-type: none"> a) the present use is inappropriate for the locality; or b) there is adequate alternative provision in the vicinity; or c) the potential for continued use of the site or premises has been shown to be unviable. The feasibility of retaining existing uses should include offering the site or premises for sale on the open market for at least one year at a realistic price. <p>Where the loss of the employment site is justified a community use or market/affordable housing provision will be given priority where such a need exists and the site is suitable for such development (see also Policy 49 and Policy 53).</p>
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- 4.170 The aim of this policy is to prevent the inappropriate loss of existing employment sites and buildings to other uses, unless there are overriding benefits that can be attributed to the new development or there is adequate alternative availability elsewhere in the locality. Employment in the National Park is generally small or micro-scale and scattered. 'Employment sites and buildings' means sites and buildings (whether currently in use or unoccupied) with planning permission or lawful use. In the National Park there is limited appropriate land to accommodate business developments. It is particularly important to protect existing sites such as former garage sites for reuse for employment undertakings and prevent redevelopment for other purposes. In criterion a) the present use will be judged in terms of compatibility of the nature and scale of the use within the local area and its impact on the local road network. In criterion b) the assessment of adequate alternative provision in the vicinity will consider the capacity of existing uses, availability of vacant premises and employment sites. In criterion c) one of the objectives of the Plan is to ensure that the needs of local communities are prioritised in the use of land. This means that the delivery of affordable housing and/or the provision of community facilities will be considered as a first priority for the re-use of employment land. Other uses will not be supported unless housing or the provision of a community use is not suited to the site.

Farm Diversification

- 4.171 Broadening the economic base of farming activities is recognised as a means of improving the viability of the farm economy of the area.

- 4.172 This policy concerns itself with farm diversification developments (economic activities clearly linked to a working agricultural unit where it is assisting in maintaining farm incomes). An agricultural unit means agricultural land occupied as a unit for the purposes of agriculture including any dwelling or other building on that land which is occupied for the purposes of farming the land by the person who occupies the unit or any dwelling on that land occupied by a farm worker.
- 4.173 Proposals may usefully be supported by robust Farm Plans which will give the Authority more information on how the proposed development will help sustain the farm business both in the short term and the long term. The Authority can then understand the overall approach to the whole farm, rather than an ad hoc approach with small applications trickling in over time. A farm plan can show how the money from the proposed development would be invested in the farm to ensure a more viable farming activity. The functioning of the agricultural unit should not be prejudiced by the proposal.
- 4.174 In considering any diversification proposal, the Authority will have regard to the effects such proposals are likely to have on the amenity of neighbouring residents and the adequacy of existing road network to cope with any changes in traffic flows arising from the proposal. Many existing farms are located in isolated locations with access along narrow country roads.
- 4.175 Most farming enterprises are located within attractive countryside and any new building where justified should be constructed sympathetically within the landscape and be of an appropriate scale to its setting and surroundings. Any need for a new building and why existing ones are not suitable will need to be explained. Diversification proposals which re-use existing buildings will be viewed more favourably than those requiring the erection of new structures.
- 4.176 Consideration of 'unacceptable adverse effects' will include potential impacts on designated sites, such as Natura 2000 sites (see Policy 10).

Policy 46	<p>Farm Diversification</p> <p>Permission will be given to farm diversification proposals where:</p> <ul style="list-style-type: none"> a) The scheme takes place on a working agricultural unit; and b) The proposal assists in sustaining the agricultural unit; and c) The proposal is compatible with its location; and d) The proposal is in harmony with and/or enhances the National Park landscape; and e) If a new building is justified it should be sited in or adjacent to an existing group of
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buildings; ¹⁴⁸and

- f) The vitality and viability of retailing and services of nearby Centres are not adversely affected; and
- g) Subject to there being no unacceptable adverse effects.

Where such requirements are satisfied the National Park Authority will use conditions attached to the planning permission or require the applicant to enter into a legal agreement to ensure that the diversification proposal is tied in perpetuity to the agricultural unit.

¹⁴⁸ Guidance on siting new farm buildings will be prepared.

Priority E: Affordable Housing and Housing

E. Affordable Housing and Housing Provision

Demographic Analysis

- 4.177 In Pembrokeshire the nature of the starting population and migrant population in the Pembrokeshire Coast National Park is different than outside the National Park. In short both groups tend to be older in the National Park than the rest of Pembrokeshire.
- 4.178 Welsh Government household projection figures would suggest that there is little justification to make a housing provision in Local Development Plan 2. Population and household projections prepared for the Authority¹⁴⁹ provides a range of alternative demographic and dwelling- led scenarios, for comparison with the Welsh Government's 2014-based population projections. In terms of growth outcomes, those that are dwelling led reflect a reversal in future trends estimated under demographic led scenarios. Dwelling-led scenarios retain a more youthful population profile but a significant growth in the older age-groups remains a feature of all scenarios.

Local Housing Market Assessment¹⁵⁰

- 4.179 The total affordable housing need extrapolated over a 16 year Plan period would be 370 (per annum need) multiplied by 16 which would total 5,920 affordable housing units. The need is greater than any historic dwelling completion rate for the National Park.
- 4.180 The table below shows:
- the proportion of households in each tier of the Plan area in 2011.
 - the level of housing need as identified in the Local Housing Market Assessment for the period 2014 to 2019 for each tier.
 - the annual average completion rates for the period 2005 to 2015 in each of the tiers.
 - how closely the percentage distributions of households, affordable housing need and completions match.

¹⁴⁹ Background Paper: Demographic Forecasts January 2018

¹⁵⁰ Background Paper Local Housing Market Assessment
Pembrokeshire County Council 2014 & the Affordable Housing Study
May 2017

Table 3 Housing Need and Completion Rates

	2011 Households	% of Total	Community Council/ Group of Housing need per year 2014 - 2019 (Total)	5 Year Need	% of Total	Annual Completion Rate 2005 to 2015	% of Total	Using Historic Annual Delivery Rate 2005 to 2015 60 per annum 16 Year Provision
Tenby	2253	22%	88	440	24%	16	27%	256
St Davids	851	8%	34	171	9%	5	8%	80
Newport	583	6%	24	120	6%	2	4%	32
Saundersfoot	1200	12%	45	225	12%	9	16%	144
Rural Centres & Countryside	5390	52%	178	892	48%	27	46%	432
Total	10,277	100%	370	1848	100%	59	100%	944

4.181 Table 3 above shows how affordable housing need tends to correlate with the proportion of households in each location and the rates of development in each tier. Provision apportioned in this way (in accordance with existing households) would proportionally reflect where affordable housing needs to be provided and where the market has been supportive in providing housing in the past. It would also reflect the spatial strategy of the Plan which seeks to locate development in the most sustainable locations where services are available.

Past Delivery Rates

4.182 Overall historic completion rates help to provide a picture of what the market is likely to support in terms of rates of development.

4.183 Given the small size of many of the sites, building in the National Park is carried out by small and medium sized firms. Volume builders are not currently operating in the National Park (December 2017).

4.184 The figures above are showing an average of 60 dwellings per annum being completed over the period 2005 to 2015. Depending on the 10 year period chosen the completion figure can range

from an average of 57 to 94 dwellings per annum (see Housing Background Paper Table 6).¹⁵¹

4.185 In the adopted Local Development Plan the Authority sought to increase the supply of housing land to deliver more affordable housing but the overall provision was too ambitious (expectations of over 100 dwellings per annum over the Plan period) as was the expectation for affordable housing delivery (expectations of 530 over the Plan period). There were also issues around the deliverability of some sites allocated in the adopted Local Development Plan so their replacement with deliverable sites could boost potential supply and delivery in some locations to some extent. The total provision for the last Plan was an estimated at 1,600.

4.186 The table below provides a summary of potential requirements depending on various completion rates. A 10% contingency in line with Welsh Government advice is also included.

Table 4 Housing Requirements based on Development Rates

Completions Per Annum	Years	Requirement	With 10% Contingency
60	16	960	1056
70	16	1120	1232
80	16	1280	1408
90	16	1440	1584

4.187 The Housing Background Paper Table 6 provides a count of rolling 10 year average completion rates. The number of times the 90 or above per annum completion figure was achieved over a 10 year period was 4 times out of the 13 times the figure was calculated, 80 or above completions happened 8 times (60% of the time), 70 or above was 9 times (70% of the time) and 60 or above 12 times (90% of the time).

4.188 The overall likely future pattern of development based on past experience shows that there are some locations where the pick of sites for development could influence future completion rates more positively than the 60 per annum figure used for comparison in Table 3 above. However, in other locations there are difficulties in finding deliverable sites which will have a negative influence on the overall figure.

¹⁵¹ Housing Background Paper Table 6

- 4.189 Below is a more detailed description of the issues by each tier in the spatial hierarchy.
- 4.190 **Tenby (Tier 2):** Historically Tenby's completion figures have benefitted from opportunities to convert and redevelop existing sites and buildings within the town itself. The majority of sites that have been allocated in previous development plans in Tenby have however not progressed (see Joint Housing Land Availability Report 2016). They were potentially substantial contributors to the land supply. Although it would be preferable to make most provision in this Town, given its level of affordable housing need and the ability of the market to support affordable housing development,¹⁵² it is now constrained by lack of developable land, sea to the south, a tight National Park boundary and landscape setting. The candidate site process did not identify any new sites. The provision is predominantly based on two sites that will remain as allocations in Local Development Plan 1 until replaced by Local Development Plan 2. The assumption is that such an action will provide the impetus to bring these sites forward. The owners have advised of their intention to bring the sites forward.
- 4.191 **St Davids (Tier 3):** The rate of development in the City has been constrained in recent times due to difficulties in bringing forward the Gastrin Lane allocation in Local Development Plan 1, a substantial allocation in size. It is anticipated that this site will come forward during the Plan period.
- 4.192 **Newport (Tier 3):** Historically Newport has also been constrained with few sites remaining when development plans are finally adopted. The future looks more positive with the anticipated progression of the Feiyr Eglwys site from Local Development Plan 1 and the identification of suitable sites by the Authority for allocation.
- 4.193 **Saundersfoot (Tier 3)** Allocations for the Plan are unlikely to return Saundersfoot to more historic rates of completion (19 per annum late 1980s to mid 1990s). Large new sites are likely to need a lead in time before development commences and are likely to be developed out beyond the Local Development Plan 2 period.
- 4.194 **Rural Centres and Countryside (Tier 4 & 5):** Annual completion rates between Rural Centres and the Countryside between 2005 and 2015 were almost evenly split. Looking at allocation sites

¹⁵² Local Housing Market Assessment 2014 and the Affordable Housing Study May 2017

opportunities in the Rural Centres the split should be more predominantly in favour of Rural Centres in the future. Overall historically a completion rate of 27 per annum is recorded between 2005 and 2015.

- 4.195 A 60 dwelling per annum average overall is considered deliverable in principle.
- 4.196 Conclusion: Welsh Government household projection figures would suggest that there is little justification to make a housing provision in Local Development Plan 2. Provision would however, potentially provide for the retention of a more youthful population profile. A significant growth in the older age-groups would remain. The 2014 Local Housing Market Assessment suggests that there is a significant need for affordable housing in the National Park: an estimated annual requirement of 370 units for the period 2014 to 2019. Affordable housing need exceeds that which the market housing can provide for. A policy based on providing for market housing to cross subsidise the provision of affordable housing would assist in meeting the need. The key determinants for what can be provided are the:
- distribution of housing development in accordance of with the Plan's spatial strategy
 - the deliverability of sites
 - the National Park's landscape capacity to absorb additional housing development.
- 4.197 This policy approach is likely to secure in principle a deliverable housing provision of 960 dwellings including an affordable housing provision of an estimated 250 dwellings. A contingency has also been added to the provision in accordance with Welsh Government requirements.
- 4.198 This Plan sets out a housing provision which in principle should be deliverable based on historic rates of development.
- 4.199 This policy approach scored best overall in terms of sustainability appraisal and the soundness tests.
- 4.200 If we wish to maintain the special qualities of the National Park, the amount of housing that can be built is limited by the capacity of the landscape to absorb it without significant impact. This is an overarching issue to address.
- 4.201 In terms of the soundness tests this Policy approach is the most compliant with national planning policy in its drafting and in the derivation of the housing land supply. It also takes account of the

need for affordable housing in the area, viability testing and deliverability.

4.202 Table 5 below shows the housing land supply for the Local Development Plan as at March 2018.

Components of Supply

4.203 The base date for the Plan is April 2015.

4.204 The table below identifies the components of land supply.

4.205 The Authority has relied on the Joint Housing Land Availability Study 2016 regarding the likelihood of sites of 5 or more dwellings coming forward in the period 2016 to 2021. The supply comprises of sites with outline or full planning permission, sites with a resolution to grant planning permission subject to the signing of a section 106 agreement and sites allocated for housing in the adopted local development plan, categorised as prescribed in Technical Advice Note 1.¹⁵³ This study influences the figures provided in the table below. In the table:

- A: sets out total completions for small and large sites between April 2015 and April 2016.
- B: A figure is not included for under construction.
- C: Units with planning permission 1st April 2016: The figure provides a figure for planning permissions as at 1st April 2016. The figure is discounted to take account of the likelihood that all sites will not be delivered. This relates primarily to issues known regarding some larger sites with permission (sites of 5 or more units). The overall result is a discount of 25%. See Appendix 2 of the Housing Background Paper for more information.
- D: The figures identify sites of 5 or more dwellings which are zoned as allocations on the Proposals Map and are listed under Policy 48. 30 Dwellings per hectare density is used unless there is more up to date information available such as an advanced pre-application or a planning permission in place post April 2016 or if the site has been assessed for the previous Local Development Plan and there is information on the estimated number of dwellings that are feasible on the site. Figures are estimates.
- E: large windfall sites (5 or more unit sites): Reflects the completion rate on five or more unit windfall sites between 2007 and 2016. The figures have been reduced by 40% for Tenby to

¹⁵³ Technical Advice Note 1 Housing Land Availability 2015

reflect reduced opportunities over time as explained above under 'Past Delivery Rates'.

- F: small windfall sites (fewer than 5 unit sites): F is derived from the Joint Housing Land Availability Studies 2011 to 2017 small site completion figures and is distributed according to the number of households in each tier.

Table 5 Components of Housing Land Supply

	Components of Housing Supply	Tier 2 Tenby	Tier 3 Crymych St Davids Newport Saundersfoot	Tier 4 Rural Centres	Tier 5 Countryside	TOTALS
A	Total completions (small and large) 01.04.15 – 31.03.16	14	5	14	13	46
C	Units with planning permission 31.03.16	42	42	47	18	149
D	Allocations	0	310	192	0	502
E	Large windfall sites (+5) 15 years remaining	80	37	5	10	132
F	Small windfall sites (-5) 15 years remaining	69	82	95	72	318
G	Approximate housing provision	205	476	353	113	1147

4.206 The same table is set out below but just includes affordable housing.

Table 6 Components of Affordable Housing Land Supply

	Components of Affordable Housing Supply	Tier 2 Tenby	Tier 3 Crymych St Davids Newport Saundersfoot	Tier 4 Rural Centres	Tier 5 Countryside	TOTALS
A	Total completions (small and large) 01.04.15 – 31.03.16	0	0	0	1	1
C	Units with planning permission 31.03.16	17	22	19	4	62
D	Allocations	0	116	55	0	170
E	Large windfall sites (+5) 14 years remaining	20	5	0	0	25
F	Small windfall sites (-5) 14 years remaining	10	5	0	0	15
G	Approximate affordable housing provision	47	148	74	5	273

- 4.207 A: a large number of affordable houses were under construction in 2015-2016 which will be reflected in completions figures for the year 2016-2017.
- 4.208 Please note the percentage figures for affordable housing provision used to calculate Row D are set out in the Authority's Land Implementation Study December 2017 and are estimates.

Policy 47 Housing (Strategy Policy) ★

Based on the level of anticipated affordable housing need, balanced against deliverability and landscape capacity, provision is made for 1,150¹⁵⁴ housing units to deliver a housing requirement of 960¹⁵⁵ dwellings between 2015 and 2031.

Policy 48		Housing Allocations			
The following sites are allocated for housing:					
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requirement	Estimate Market & Affordable (Allocation)	Estimate Affordable Housing Figure (Allocation)
Newport					
HA1 ¹⁵⁶	North of Feidr Eglwys	1.5	40%	35	14
HA2 ¹⁵⁷	Parrog Yard & Pottery Site	0.24	66%	12	8
HA3	Land North of the Business Park	0.5	50%	15	8
Saundersfoot					
HA4	Land at Sandy Hill	2.26	45%	68	31
HA5	North of Whitlow	1.8	40%	54	22
HA6	Penny Farm	1.13	45%	36	16

¹⁵⁴ A contingency allowance will allow sufficient flexibility for the non-delivery of sites and unforeseen issues.

¹⁵⁵ An estimated 960 new dwellings are delivered of which an estimated 250 are affordable units – see Policy 49

¹⁵⁶ Figures reflect planning permission NP/15/0194

¹⁵⁷ Figures reflect planning permission NP/17/0301

Policy 48	Housing Allocations The following sites are allocated for housing:				
Location Proposals Map ID	Site Name	Hectares	Indicative Affordable Housing Requirement	Estimate Market & Affordable (Allocation)	Estimate Affordable Housing Figure (Allocation)
St Davids					
HA7	West of Glasfryn Rd	3.34	20%	90	18
Broad Haven					
HA8 ¹⁵⁸	South of Driftwood Close	0.66	40%	10	4
HA9	North East & South East of Marine Rd	3.14	10%	94	9
Jameston					
HA10	Opposite Bush Terrace	1.69	29%	38	11
Lydstep					
HA11	West of the Green	0.4	50%	10	5
Manorbier Station					
HA12	Field Opposite Manorbier VC School	0.63	91%	23	21
Square & Compass					
HA13	Glasfryn Field	0.26	30%	7	2
HA14	Land adj to Bryngolau	0.33	30%	10	3
St Ishmaels					
HA15 ¹⁵⁹	Adj to the School	0.74	25%	13	3
Trefin					
HA16	Land off Cefn Gallod Trefin	0.35	30%	10	3

4.209 In summary the main selection criteria for allocation are:

- Site Size: A threshold of sites that are capable of accommodating 5 or more units will be potentially allocated in the Plan for housing.
- Acceptability in terms of location: Development in the countryside is strictly controlled. Residential development, in

¹⁵⁸ Figures reflect planning permission NP/14/0681

¹⁵⁹ Figures reflect planning permission NP/16/0219

particular which is remote from Centres (listed in Policies 2 to 5 and 6) is unlikely to be carried forward.

- Acceptability in terms of scale of housing proposed: The preferred policy option for the scale of provision anticipated overall is set out in Policy 47. The introductory text to this Chapter outlines the scale of provision anticipated in the various tiers of the spatial strategy.
- Impact on the National Park landscape: Constraints such as impact on the National Park landscape or nature, Conservation Areas, Listed Buildings, flooding etc.
- Infrastructure: New development can place additional pressures on existing infrastructure such as highways, water supply, drainage and sewage capacities as well as local facilities such as schools, medical and recreational facilities.
- Access: Consideration will be given to the suitability of pedestrian/cycle/public transport/vehicular access to the site.
- Financial Viability and Deliverability: the Authority needs to be confident that any allocated site has a realistic prospect of being developed for its intended use within the Plan period – up to 2031.

4.210 Sites have also been considered through related assessments that are triggered by preparing a plan of the nature and scope of the Local Development Plan. These include a Strategic Environmental Assessment/Sustainability Appraisal (SEA/SA) and a Habitats Regulations Assessment.

4.211 The tables below focus on unique site issues primarily in terms of landscape, archaeological and ecological advice which will need to be addressed when proposals are brought forward. Unique requirements are also included where relevant for some potential large housing windfall sites which were assessed as part of the candidate site process.

4.212 For those sites highlighted with a ‘◆’ an initial assessment using data was sourced from the emerging Welsh Government, Department for Environment and Rural Affairs’ (Defra) Draft Predictive Agricultural Land Classification Map for Wales (2017) shows that soil within the site is high-grade agricultural land (Grades 1, 2 or 3a). Further analysis will be required to check the accuracy of the data and the use of conditions on any planning permission granted may be necessary to ensure that the soil resource can continue to provide identified benefits.

Table 7 Housing Allocations - Requirements

Location Proposals Map ID	Site Name	Requirements
Newport		
HA1	North of Feidr Eglwys	Planning permission was granted on this site for 35 housing units (14 affordable units) under planning reference NP/15/0194, approved in June 2016. Candidate Site Reference: 141
HA2	Parrog Yard & Pottery Site	Planning permission was granted on this site for 12 housing units (8 affordable units) under planning reference NP/17/0301, approved in November 2017. Candidate Site References: 065A/067A
HA3	Land North of the Business Park	Careful consideration on layout and massing will be required to integrate any development with the neighbouring business park. The retention and strengthening of existing hedge banks as well as providing new ones to define the site will be required. Maintenance of greenspace to break up development will also be required. The adjacent wooded area has potential for providing a supporting habitat for bats, or as part of a strategic commuting route or flight line. Further survey work will be required in this regard. Development proposals for this site must demonstrate compliance with Policy 10 of the Plan (Sites and Species of European Importance). There are several recorded heritage assets in close proximity to the site, which is also at the edge of the medieval town. There is potential for archaeological deposits/features to extend into the site. Further assessment will be required as part of any planning application to develop the site. Candidate Site References: 068/088A/089A/090A
Saundersfoot		
HA4◆	Land at Sandy Hill	Additional landscaping along the southern boundary of the site to strengthen the edge of the built area is required. Provision of pedestrian access into the site from the north will need to be achieved.

Location Proposals Map ID	Site Name	Requirements
		Candidate Site Reference: 015
HA5◆	North of Whitlow	Land to the west of the site is highlighted for future growth, beyond 2031 on the Proposals Map. Candidate Site Reference: 031A
HA6◆	Penny Farm	No comments. Candidate Site Reference: 037
St Davids		
HA7◆	West of Glasfryn Rd	Retention of existing and recently formed hedgerow (along Glasfryn Road) will be required to define site boundaries and break up development within the site. There are several sites in the wider landscape that indicate prehistoric and medieval activity. This is a large site and there is potential for preserved archaeological remains. Further assessment will be required as part of any planning application to develop the site. Candidate Site References: 021A/099A
Broad Haven		
HA8	South of Driftwood Close	Planning permission was granted for 10 houses (includes 4 affordable dwellings) NP/14/681. Candidate Site Reference: 006
HA9◆	North East & South East of Marine Rd	No comments. Candidate Site Reference :039/041
Jameston		
HA10	Opposite Bush Terrace	Planting to the south of the site would help to assimilate development on the skyline and reduce the obtrusive farm buildings nearby to the west. This requires a substantial planting belt with new hedgebank boundary features which would help preserve and enhance the character of the landscape. Landscaping and planting, sensitive architectural design and density and a development pattern which reflects existing building within Jameston will be important considerations in

Location Proposals Map ID	Site Name	Requirements
		mitigating impact on the historic environment. Candidate Site Reference: 022
Lydstep		
HA11◆	West of the Green	Land to the west of the site is highlighted for future growth, beyond 2031 on the Proposals Map. Candidate Site Reference: 086A
Manorbier Station		
HA12	Field Opposite Manorbier VC School	Trees along the eastern boundary of the site are the subject of a Tree Preservation Order and must be protected during and after development of the site. Candidate Site Reference: 029
Square & Compass		
HA13◆	Glasfryn Field	A new hedgerow will be required to consolidate the rear boundary and contain development to the north. Development should retain the linear character of Square and Compass and a degree of porosity when viewed from the A487, to maintain the intermittent views of the coastal headland to the north. Candidate Site Reference: 014A
HA14◆	Land adj to Bryngolau	A new hedgerow will be required to consolidate the rear boundary and contain development to the north. A public right of way runs along the western boundary from north to south. Any development will need to avoid causing unacceptable detrimental impacts to the amenity level of this existing public right of way. Candidate Site Reference:106
St Ishmaels		
HA15	Adj to the School	Outline planning permission was granted on this site for 13 units (3 affordable) under planning reference NP/16/0219, approved in September 2016.

Location Proposals Map ID	Site Name	Requirements
		Candidate Site Reference: 055A
Trefin		
HA16◆	Land off Cefn Gallod Trefin	When viewed from the south visual impact will need to be minimised by ensuring all existing boundary hedgerow is retained with additional planting provided. Access should be provided via Cefn Gallod to concentrate development in a linear form along the southern boundary. Green spaces should be provided to the north. Roof heights should remain within the context of neighbouring residential development. Candidate Site Reference :050

4.213 There are also potentially some large windfall sites. These sites may come forward during the life of the Plan for housing purposes. Due to uncertainties about their deliverability they have not been formally allocated. They lie within the Centre Boundary.

Table 8 Potential Large Windfall Housing Sites (5 or more dwellings) - Requirements

Location Site Name	Requirements
Dinas Cross	
Land to the Rear/West of Spring Hill	The deliverability of this site is uncertain (Land Implementation Study December 2017). Access would be required from the A487 to the north via the demolition of existing development in respect of highway safety and landscape visual impact considerations. Development would need to emulate the linear layout of Spring Hill to the east to remain in keeping with the existing built context. Candidate Site References: 054/013A/074A/095A/135A
Lawrenny	
Adjacent to Home Farm	Deliverability of this site is uncertain (Land Implementation Study December 2017). Development of this site would require retention of a soft landscape edge to the north. Suitable relocation of the existing farm buildings would be required prior to development proceeding. The existing private sewer requires upgrading to accommodate any development within this site. Further consideration is also required in respect of disposal of wastewater due to the likelihood

Location Site Name	Requirements
	of discharge direct to the Pembrokeshire Marine Special Area of Conservation (SAC). Development proposals for this site must demonstrate compliance with Policy 10 of the Plan (Sites and Species of European Importance). Candidate Site Reference: Site 045◆
Solva	
Bank House	Deliverability issues arise in relation to legal covenants on the site. Should a proposal come forward the proposal will need to take into account that this site is the walled garden of Bank House, a Listed Building. The wall is a curtilage feature and therefore included in the listing – the roadside wall in particular is a prominent feature. Development will need to respect the setting of the Listed Building. Candidate Site Reference: 102

4.214 The Land Implementation Study provides information on most of the sites in terms of availability, the amount of infrastructure required, the indicative costs and any mitigation requirements as at December 2017. The figures provided for affordable housing figures on the sites listed in Policy 48 are therefore indicative (see Planning Policy Wales Edition 9 November 2016 (paragraph 9.2.17)). They are based on assumptions used to determine viability as set out in the Affordable Housing Study and the Land Implementation Study or where there was information available through pre-application or planning application discussions. As sites are taken forward further information can be taken account of such as the latest information on Welsh Water's investment programme, the refining of infrastructure costs and changes in house prices and build costs.

Policy 49	Affordable Housing (Strategy Policy) ★
	To deliver affordable housing the National Park Authority will on proposals that include market housing:
	a) Seek to negotiate affordable housing to meet the identified need in the housing submarket areas and Centres as set out in Table 9 below. ¹⁶⁰
	b) Seek a financial affordable housing contribution to help with the delivery of affordable housing on:
	▪ proposals where the provision of an affordable dwelling on site is not possible ¹⁶¹

¹⁶⁰ This excludes indicative targets for housing allocations in the Plan which are set out in Policy 48.

- Conversion opportunities in the countryside (Policy 7d).

The Authority will also allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need.¹⁶²

When considering a new use for a redundant community facility an employment use or housing contributing to or providing affordable housing will be prioritised. When considering a new use for an employment site a community use or a housing development contributing to or providing affordable housing will be given priority. The percentage affordable housing requirements and contributions set out below will be sought.

Where a planning application is received for a site below the affordable housing threshold but which is part of a larger site which is above the threshold then the Authority will expect affordable housing to be provided. This is to ensure that sites are not broken up into smaller portions and phased which would avoid the requirement for affordable housing.

The affordable housing target for the Plan period is an estimated 250 affordable housing units.

Policy 53 provides further advice on prioritising affordable housing when negotiating planning obligations.

4.215 The approach to affordable housing delivery is to:

- a) Use market housing to cross-subsidise affordable housing delivery.
- b) Prioritise the delivery of affordable housing over other land uses for example by not allowing new build self-catering in the countryside. Brownfield provision of self-catering is permitted in Centres and the countryside but only where there the site or building is unsuitable

¹⁶¹ Where the percentage of affordable housing required on a site results in a fraction of a unit then a financial affordable housing contribution will be expected.

¹⁶² Affordable housing on exceptions sites should meet the needs of local people (paragraph 9.2.23 of Planning Policy Wales, Edition 9, November 2016). Low cost home ownership will not be supported on exceptions sites.

for market or affordable housing – see Policy 41. Also, when finding new uses for community facilities and employment sites that are no longer required uses beneficial to the community (including affordable housing delivery) are prioritised – see Policy 45 and Policy 53. Priority is also given to securing affordable housing through S106 agreement negotiations (see Policy 53).

- c) Use new or replacement conditions on rural enterprise dwellings which will mean some limited opportunities may become available for affordable housing.

Table 9 Percentage of Affordable Housing for Housing Submarket Areas

Housing Submarket Area	Post Code Area	Local Centre	Rural Centre	% of affordable dwellings (threshold for delivery on site)
Newport	SA42 0	Newport	Dinas Cross Nevern	50%(2)
Tenby	SA70 7	Tenby	Jameston Lydstep Milton Manorbier Manorbier Station	50%(2)
South East Coast	SA69 9 SA70 8 SA67 8	Saundersfoot, Tenby	Amroth Carew Jameston Milton New Hedges Pleasant Valley Wiseman's Bridge	50%(2)
St Davids and North Coast	SA62 6 SA64 0 SA62 5	St Davids	Roch, Newgale, Porthgain Solva, Trefin, Square and Compass	35%(3)
South West Coast	SA71 5	N/A	Angle Bosherston Castlemartin Lamphey	25%(4)
St Brides Bay	SA62 3 SA73 3	N/A	Little Haven Broad Haven Dale Marloes	25%(4)

Housing Submarket Area	Post Code Area	Local Centre	Rural Centre	% of affordable dwellings (threshold for delivery on site)
			Nolton Haven St Ishmaels Herbrandston	
Estuary Hinterland	SA68 0 SA62 4 SA73 1 SA72 4	N/A	Cosheston Cresswell Quay Hook Lawrenny Llangwm Houghton	20%(5)
North East NP	SA65 9 SA43 3 SA41 3 SA63 4 SA66 7	Crymych	Felindre Farchog Moylegrove Mynachlogddu Pontfaen Rosebush	20%(5)

4.216 Affordable housing contributions are managed by Pembrokeshire County Council as the housing authority. The Authority's Supplementary Planning Guidance will prescribe the local area within which such funds should be spent. The contributions fund a variety of proposals. The County Council has prepared a framework for spending contributions.¹⁶³

4.217 In order for sites to be considered as exceptions sites a need for affordable housing must be shown and there must be a mechanism for making sure the properties remain affordable in perpetuity. In the case of Low Cost Home Ownership, experience has shown that no mortgage lender will lend without a mortgagee in possession clause being included within a Section 106 legal agreement. As such a clause enables the re-sale of the property without restriction (in circumstances where the property is re-possessed); this does not guarantee that it will remain affordable in perpetuity. The Authority is keen to ensure that exception sites do not become market sites over time as a result of such clauses. Given this situation, exception sites will only be permitted for affordable rented properties.

4.218 The Authority recognises that it will need to monitor changes in values and costs as they affect viability.

4.219 The Authority is committed to ensuring delivery of the most appropriate type of affordable housing to meet the needs of the community. The Pembrokeshire 2014 Local Housing Market Assessment indicated that the predominant need for affordable

¹⁶³ Use of Affordable Housing S106 Contributions February 2016
Cabinet Report Pembrokeshire County Council

housing in all parts of Pembrokeshire is for social rented properties (83%). Pembrokeshire County Council also has evidence from monitoring work of Low Cost Home Ownership applicants encountering difficulties in gaining mortgages. Furthermore, the Council's experience of the re-sale of these properties has been that occupants who have benefited from the Low Cost Home Ownership property have often not fully understood the nature of the ties associated with the property and are discontent with the process involved. For all of these reasons, this Authority is keen to prioritise the delivery of rented affordable properties above Low Cost Home Ownership properties, where this is a requirement through a S.106 agreement on market sites. As a result, on market sites, where an onsite contribution or provision is necessary, the Authority will require the delivery of social and/or intermediate rented properties in preference to Low Cost Home Ownership properties.

4.220 The following policies and advice provide additional guidance on housing.

Policy 50	<p>Housing Densities and Mix</p> <p>Residential development proposals will be permitted where the residential density is a minimum of 30 dwellings per hectare. Lower density levels will only be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none">a) Development at the prescribed densities would have an unacceptable adverse effect on the character of the surrounding area; orb) Reduced densities are required as a result of significant site constraints or to preserve a feature that would contribute to existing or future local amenity. <p>All new development that includes housing will only be permitted where it contributes to the creation of balanced communities, providing an appropriate mix of housing types, tenures and sizes, including properties to meet affordable housing need, unless exceptional circumstances are demonstrated. A collaborative approach based on the evidenced viability of the new development will be taken in order to establish an appropriate mix of housing types and tenures which will contribute to the objective of achieving mixed and sustainable communities.</p>
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4.221 New residential development will seek to use land efficiently, providing dwellings that meet current housing needs whilst protecting land for future generations. A minimum residential density of 30

dwellings per hectare will therefore be required for new residential development save as set out in paragraph 4.220 below.

- 4.222 Development below the specified residential density levels will not be permitted unless it is demonstrated that there are significant constraints associated with a site that prevent development at the specified levels or where development at the density required would have an adverse impact on the character or appearance of the locality or result in the loss of an important site feature. Higher densities will be permissible and indeed encouraged where they represent the sustainable use of land and reflect the character of the surrounding area and would not unacceptably impact upon local amenity.
- 4.223 New build affordable housing provision will be expected to meet the minimum gross internal floor areas and storage (m²) for the relevant property type and size as set out Welsh Government Development Quality Requirements or any similar standards that may replace them from time to time.
- 4.224 The Plan's strategic objective for housing is to facilitate the delivery of affordable housing needs. Proposals that are unable to contribute to the delivery of sustainable well-balanced communities by including on site provision of affordable housing or contributing financially to the delivery of affordable housing by way of a financial contribution will not be permitted unless exceptional circumstances are demonstrated.

Gypsy and Traveller and Showpeople Sites

Policy 51 Gypsy Traveller and Showpeople Sites


Proposals for Gypsy Traveller and Showpeople sites will be permitted where:

- a) evidence of need to locate or provide transitory arrangements in the area has been identified; and
- b) the site is well located to serve the needs of Gypsy and Travellers or Showpeople including the need to access local services; and
- c) the site has good access to a public road which is safe and direct; and
- d) the site is suitable for the development and on site services facilities can be adequately provided; and
- e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and
- f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.

4.225 The Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment (2015 GTANA) sets out the need for Gypsy and Traveller sites and Travelling Showpeople's yards in Pembrokeshire.¹⁶⁴No need has been identified in the Pembrokeshire Coast National Park.

4.226 The potential for negative effects on Natura 2000 sites is unlikely but remains dependent on the scale and location of the site. The reference to 'direct' access means there is a requirement for the access to the site to be directly from the public highway.

One Planet Development

<p>Policy 52 One Planet Development </p> <p>In addition to satisfying the requirements of national planning policy One Planet Development will be permitted where:</p> <ul style="list-style-type: none">a) the proposal will make a positive social and/or economic contribution with public benefit; andb) the development is of a scale no greater than is necessary to meet the needs of the overall project; andc) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; andd) the development is well integrated into the landscape and does not adversely affect the National Park's special qualities.

4.227 The elements of local policy for One Planet Development in the Pembrokeshire Coast National Park that are not covered in national policy and guidance are set out above. One Planet Development will need to satisfy both national policy and local planning policy.

4.228 With regard to criterion a) in national guidance there is no specific expectation that social and economic benefits will always be provided but there is an expectation that that One Planet Developments should face outwards and engage with local communities. The National Park Authority will expect proof that there is a positive contribution from the development in terms of the environment, the use of resources, and a combination of social/economic benefits will be needed. Public benefits might include providing services to the community. With regard to criterion b) the Authority is keen to ensure that the

¹⁶⁴ Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment (2015 GTANA)

development does not include non-essential elements e.g. unused poly tunnels or large wind turbines that are superfluous to requirements. With regard to criterion c) 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 or their setting in the landscape are re-used where they are present (see Policy 7). 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. Where existing buildings are of particular value, their re-use as part of a One Planet Development can be acceptable even if in re-use they cannot achieve the same environmental performance in terms of construction and use as new buildings.

4.229 With regard to criterion d) Policy 8 and Policy 16 of the Local Development Plan set out the special qualities of the National Park and key considerations that need to be addressed to ensure that those special qualities are not lost to future generations. Policy 34 will with supporting Supplementary Planning Guidance provide policy and guidance on renewable energy developments. The impact of associated activities such as materials' storage and the impact of lighting (Policy 9) will need to be considered.

4.230 Supplementary Planning Guidance will be prepared to support this policy.

Priority F: Community Facilities, Retailing, Transport


F. Community Facilities, Retailing, Transport

Community Facilities & Infrastructure

- 4.231 Meeting the local needs of communities means bringing homes, jobs, facilities and services within close reach and supporting existing facilities and services. There is clearly a need to ensure that new development makes services and facilities better for people elsewhere.
- 4.232 The strategy is to ensure that new development does not reduce the existing level and range of provision of community facilities available to Park residents and visitors, unless the facility is no longer required or is not commercially viable, and that, additional infrastructure¹⁶⁵ or services required by a proposal are put in place at the appropriate time. With new and extended facilities they will be encouraged where they are well located to meet the community's needs and convenient to public transport, shops and other services where this is required to serve the needs of the user. The spatial strategy proposed by the Local Development Plan should assist in this aim.
- 4.233 At the end of the Local Development Plan period there will be at least the same number of community facilities as at the beginning of the Local Development Plan period unless loss was unavoidable because they were no longer required. Ensuring quality of provision is not adversely affected will be an important consideration. With regard to criterion Policy 53b) below, commercial viability is a test for commercial enterprises. Issues to be considered when demonstrating how a suitable replacement or enhanced facility is to be made available or showing it is no longer required could include the sale of the building to provide funding for a replacement, demonstrating the facility has remained unused over a long period of time despite efforts to secure its re-use including the opportunity for part-time working/opening or, merging with other facilities to maintain viability. Opportunities for public funding to support facilities could also be considered. The Authority proposes to produce Supplementary Planning Guidance to support the application of Policy 53b).
- 4.234 Planning permissions will have secured obligations to deal with the additional infrastructure, services and facilities required by a

¹⁶⁵ See [6. Glossary of Terms](#)

proposal.¹⁶⁶ Supplementary Planning Guidance will be prepared to support Policy 53 c) to explain the requirements for delivering improvements to infrastructure, services and facilities made necessary by the development. This Authority will also continue to consider the implications of the possible introduction of the Community Infrastructure Levy in consultation with partner organisations.

Policy 53 Community Facilities and Infrastructure Requirements (Strategy Policy) 

The provision and protection of community facilities¹⁶⁷ infrastructure and services will be achieved as follows:

- a) With new and extended facilities these will be permitted where they are well located to meet the community's needs and they are convenient to public transport, shops and other services where this is required to serve the needs of the user.
- b) Development which would adversely affect the operation of a community facility, or results in its loss will not be permitted except where a suitable replacement or enhanced facility is to be made available or where it can be shown the facility is no longer required or is not commercially viable. When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised (see also Policy 44, Policy 45 and Policy 49).
- c) Planning permission will be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure, services and community facilities made necessary by the development. Arrangements for

¹⁶⁶ Areas where contributions may be sought include, affordable housing, archaeology, nature conservation and the historic environment, community and social services, crime and disorder, education, employment and training, environmental enhancements, flood defence, town centre improvements, fire and rescue infrastructure, health care, libraries, open space, recreation and leisure facilities, recycling facilities and community schemes, transport including travel schemes, allotments, water and sewerage infrastructure and sustainable urban drainage systems.

¹⁶⁷ See [6. Glossary of Terms](#)

provision or improvement to the required standard will be secured by planning conditions attached to a planning permission or in some case planning obligations. The Authority will seek to obtain benefits to contribute to dealing with the most acute areas of need for National Park communities. This will include consideration of affordable housing; recreational and amenity open space; sustainable transport facilities; educational facilities; community facilities (including libraries); public art; and biodiversity. Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be financially viable) in terms of the policy requirements of the Plan (i.e. for affordable housing provision, sustainable design standards expected and community infrastructure provision) priority will be given to the delivery of affordable housing in any further negotiations, provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

Retail

- 4.235 The Authority, in partnership with Pembrokeshire County Council and Ceredigion County Council, has produced The South West Regional Retail Study (February 2017). Within the study, small amounts of capacity for comparison goods have been identified across the four main retail centres within the National Park up to 2036 (515m² for Tenby, 293m² for St Davids, 109m² for Saundersfoot and 89m² for Newport). The strategy for Tenby, Saundersfoot, St Davids and Newport is to maintain their position relative to one another and larger centres outside the area. Despite leaking spend to centres outside the Park area they are performing well with the support of resident and visitor spend. It is proposed to encourage the sympathetic regeneration of these Centres so that they can continue to remain attractive places to live and visit; provide a valuable role in meeting the needs of local communities and visitors, and attract niche retail opportunities. The Regional Retail Study advises that new retail floorspace is likely to be occupied by tourist related retailers and be small in scale. It is important that any new floorspace is provided in a

format that is sensitive to the character of the Centres and small scale mixed use developments should be encouraged¹⁶⁸.

- 4.236 In respect of the findings of the Regional Retail Study, no land allocations for retail use have been identified within the Local Development Plan. Criteria based policies provide the local policy context from which individual proposals for new retail development within the National Park will be considered.
- 4.237 Towns, in particular those that attract visitors, can become over dominated by non-retailing uses such as takeaways, pubs and restaurants (A3 uses) which make them less attractive for shoppers, and can introduce anti-social behaviour, whilst a diversity of uses such as recreational uses, restaurants, cafes, galleries and cinemas can reduce the need to travel out of a centre. The strategy for the Park will be to maintain areas in Tenby where only a certain proportion of non- retail use will be allowed. Generally amenity issues for A3 uses will be carefully assessed and controlled.
- 4.238 The Authority will resist any proposals which may potentially damage or undermine the retail role of these centres by restricting development outside these centres in accordance with national planning policy.¹⁶⁹ The exception to this will be the recognition of the important role rural provision makes to Park communities. Additional provision of retail at these locations is encouraged where compatible with the scale of centre. Outside the main centres other smaller centres can have local shops protected and provided as a community facility by Policy 53.

¹⁶⁸ Background Paper: South West Wales Regional Retail Study, Ceredigion County Council, Pembrokeshire County Council and Pembrokeshire Coast National Park, February 2017, pages 80-81.

¹⁶⁹ There is the potential for out-of-centre development to be in direct competition with, and to undermine centres. Planning Policy Wales, Edition 9, November 2016, July 2016, Chapter 10 advises that retail and other services are best located within existing centres at an appropriate scale. Edge-of-centre or out-of-centre retail developments are considered in Planning Policy Wales, Edition 9, starting at paragraph 10.4.4.



The retail hierarchy¹⁷⁰ is as follows:

- a) Tenby Town Centre
- b) Newport, St David's and Saundersfoot District Centres
- c) Other smaller rural centres

All new retail development should be consistent in scale with the size and character of the Centre and its role in the hierarchy.¹⁷¹ Specific areas within Tenby are identified where non retail uses will not be allowed to dominate. In all Centres, the amenity of neighbouring properties will be an important consideration where A3 uses are proposed as will the impacts on the role of the Centre (see Policy 55 and Policy 31).

Town and District Centre boundaries will help focus investment in the centre, and maintain the townscape.

4.239 The policies and advice below provide additional guidance on retail matters.

4.240 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on out of town retailing, amusement centres, farm shops, local shops, village shops and pubs. It also provides advice on factories and other businesses selling produce and retailing at petrol stations. Please refer to Chapter 10 'Planning for Retailing and Town Centres'. Town Centre (Tenby) and District Centre boundaries (Saundersfoot, St Davids and Newport) are identified on the Proposals Map along with Primary Retail Frontages at Tenby. There are also smaller rural centres, including Solva.

¹⁷⁰ See 6. Glossary of Terms

¹⁷¹ Planning Policy Wales, Edition 9, November 2016, Chapter 10 identifies examples of the type and scale of development appropriate for town, district, local and village centres (starting paragraph 10.1.2). Technical Advice Note 4 Retail and Commercial Development, November 2016, provides further guidance at paragraphs 4.1 - 4.6.

Policy 55 Town and District Shopping Centres



Within the town shopping centre of Tenby, and the district shopping centres of Saundersfoot, St Davids and Newport, and other smaller shopping centres changes of use, redevelopment or development of new buildings will be permitted where:

- a) if in a town or district shopping centre the proposal falls within Class A1, A2, A3, B1, C1, D1 or D2 of the use classes order or is a sui generis¹⁷² use normally found in such shopping centres;
- b) if in a Rural Centre the proposal is for retail or commercial uses (A1, A2 and A3 uses) or community facilities; and
- c) if it is located within a primary frontage (see Proposals Map) the proposal would not create a concentration of non-retail uses; and
- d) the scale, siting and design is appropriate and would contribute to the character and appearance of the area; and
- e) Proposals for A3 uses would not individually or cumulatively cause an unacceptable adverse effect on amenity (see Policy 31) or the role of the Centre in meeting the needs of local communities and visitors.

4.241 The policy is intended to ensure that the vitality, viability and diversity of shopping centres is maintained and enhanced. The shopping centres of the Plan area play a vital role in providing services for residents and visitors to the National Park, including leisure, recreation, schools, business and public service offices. Individual businesses benefit from the variety of shops and facilities in the centre as a whole.

4.242 The retention of retailing in Tenby town centre is supported through the definition of primary retail frontages – see Proposals Map. These are intended to ensure that the retailing character and provision of the centre is not undermined.

4.243 At primary retail frontages, non-A1 uses which would lead to or unacceptably increase the concentration of similar uses, or reduce the retail character of the area will be resisted. Each application will be considered on its individual merits whilst also having regard to the above criteria and national planning policy. However, in most cases a maximum of one-third of the retail frontage in non-A1 use, and no

¹⁷² See 6. Glossary of Terms.

more than three non-A1 units adjacent to each other is considered an appropriate balance of uses.

- 4.244 Uses which do not attract significant numbers of customers will be encouraged to locate above the ground floor level at retail frontage locations. In appropriate cases, ground floor occupiers will be required to maintain a shopfront and window display. Residential development above ground level will be considered appropriate.
- 4.245 Most non retail uses add to the vitality and attractiveness of centres, however a concentration of A3 (hot food and drink) uses such as takeaways can affect the attractiveness and amenity of the centre and limit use to certain times of the day.
- 4.246 Appropriate conditions will be applied to ensure that amenity is not adversely affected including restriction on the hours of opening, provision of appropriate litterbins and filtration (odour) equipment. Contributions may also be required to support public safety measures.

Policy 56 Garden Centres

Garden centres will be permitted where:

- a) the proposal is located within or adjacent to a Centre; and
- b) the proposal would not undermine the vitality and viability of retail facilities in any nearby Centre; and
- c) the scale and nature of any buildings proposed for retail use and the size, design, materials and siting of any new building or extension blend with existing building(s).

- 4.247 Garden centres are a distinctive element of the retailing facilities of the County. This policy is intended to ensure that retail garden centres or plant nurseries which sell to the visiting public are well located in terms of existing Local Development Plan Centres and developments, and are of an appropriate scale for the location. In many cases, the impact on local amenity and traffic issues can be an important consideration.
- 4.248 Planning conditions may be applied to limit the range of goods which can be sold from the premises and to ensure that the net retailing floorspace is appropriate, so as to protect the vitality and viability of existing centres and particularly local shops.

Sustainable Transport

- 4.249 The strategy for the National Park is to improve accessibility¹⁷³ and promote it by appropriate means for the people who work, live, rest and play in the National Park whilst reducing the need to travel by private car.
- 4.250 As the National Park is not a highways authority much of the strategy will be delivered through the policies and actions of other plans produced by the Welsh Government, and Pembrokeshire County Council Highways Authority. The Joint Transport Plan for South West Wales sets out the priorities for improving transport and accessibility in the area.
- 4.251 The spatial strategy of the Local Development Plan is to target development wherever possible to locations which have a reasonable range of facilities and access by public transport, although it is acknowledged that the National Park is predominantly rural in nature and some Centres that have a range of facilities and should be encouraged to grow, fall short on public transport provision, with little prospect for increased bus services. The services and facilities available however may help to reduce the number and length of journeys made.
- 4.252 Although the Local Development Plan's strategy directs growth primarily to Centres, there are instances where the Local Development Plan will need to consider proposals outside these locations, for example, to help economic diversification in the countryside. The strategy will be to assess proposals in terms of the traffic impact and to avoid those that cause significant concerns. Examples of this might be by generating significant levels of traffic in congested areas or where there are concerns over damage to the character of the local area and these impacts cannot be mitigated.

¹⁷³ See [6. Glossary of Terms](#).

Policy 57 Sustainable Transport (Strategy Policy)

To ensure that opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car by:

- a) Permitting proposals that assist in delivering improved traffic and parking management;
- b) Permitting facilities to improve public transport by helping to link between travel modes or providing facilities for passengers;
- c) Ensuring new development is well designed by providing appropriate access for pedestrians, cyclists, vehicles and public transport where appropriate; and
- e) Not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (see Policy 58).

4.253 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on traffic management, transport considerations in development control, transport assessments and travel plans and access to development. Planning and appraisal of transport proposals in Wales are guided by the Welsh Government's (WelTAG) Welsh Transport Planning and Appraisal Guidance which details how all transport proposals should be planned and developed. The policies below provide additional guidance and advice on sustainable transport.

Policy 58 Impacts of Traffic

Development will not be permitted where:

- a) appropriate access cannot be achieved; or
- b) traffic is likely to generate an unacceptable adverse effect on congested areas or at times of peak traffic flows; or
- c) traffic is likely to be generated at inappropriate times such as late at night in residential areas; or
- d) where there is an unacceptable adverse effect on road safety; or
- e) where significant environmental damage would be caused and cannot be mitigated; or
- f) the proposal would undermine the vitality and

viability of a Centre.

A Transport Assessment¹⁷⁴ will be required for proposals likely to have significant trip generation or where the National Park Authority has significant concerns about the possible transport impact of the proposed development.

4.254 This policy follows the National Planning Policy set out in Technical Advice Note 18 and sets out criteria for assessment of all relevant proposals.

4.255 A Transport Assessment¹⁷⁵ will be required for proposals likely to have significant trip generation:

- a) Residential developments of 25 units or more: or
- b) 100 or more vehicle movements per day: or
- c) 10 freight movements per day.

4.256 In addition if the National Park Authority has significant concerns about the possible transport impact of the proposed development a Transport Assessment will be required.

4.257 With regard to criterion f) a significant challenge will be to facilitate parking provision that adequately serves the rural hinterland, maintains the vitality and viability of the Centre while at the same time avoiding undermining both the ability to provide public transport and the incentive to walk and cycle within the Centre.

4.258 The Authority will prepare Supplementary Planning Guidance on Parking Standards.

Policy 59 Cycleways and Shared Use Paths

New cycleways and shared use paths will be permitted where they:

- a) do not have an unacceptable adverse environmental effect; and
- b) fulfil a strategic or local need (for instance forming part of or a link to the National Cycle Network); or
- c) contribute to road safety improvements (separation of cycle traffic from motor vehicles for example); or
- d) provide improved opportunities for sustainable travel (particularly within or between the main Centres and

¹⁷⁴ See Glossary of Terms.

¹⁷⁵ See 6. Glossary of Terms.

large Centres of the County and also to and from major tourist attractions); or
e) reduce traffic congestion in an historic Centre, at a rural/coastal attraction, or at schools and along well used routes to and from them.

4.259 The purpose of this policy is to support the development of cycleways and shared user paths. Like walking, cycling is a flexible and convenient travel mode, particularly for shorter distance journeys.

Utility Services

4.260 Planning Policy Wales, Edition 9, November 2016 sets out clear statements of national development control policy on water supply and quality and waste water management. Please refer to Chapter 12 'Infrastructure and Services' and Chapter 13 'Minimising and Managing Environmental Risks and Pollution'.

Policy 60 Powerlines and Pipelines

Cables or pipelines and associated development will be permitted where the least obtrusive and damaging location, route or means of provision is chosen. Where developments would be visually prominent evidence must be provided to show that alternative locations have been investigated and are impractical. Such proposals will be rigorously examined with regard to siting and design and will be permitted only where there are no unacceptable adverse effects on the special qualities of the National Park.

Where it can be demonstrated that proposals are of national significance, applications should be accompanied by technical and financial feasibility studies.

4.261 The purpose of this policy is to set out an appropriate framework for considering proposals for cabling, the construction of pipelines and associated development such as pylons, substations etc. Opportunities for undergrounding should always be explored providing that this does not result in a greater impact on the National Park's special qualities. It is acknowledged that the location or route chosen must be technically feasible. The National Park's special qualities are defined in Policy 8.

4.262 Many proposals will lie outside the scope of normal planning control with the National Park Authority only being consulted by the relevant statutory body. Therefore the Authority will, in addition to using this

policy in dealing with planning applications received for such proposals, use it in informing responses to such consultations.

4.263 Policy 34 is also relevant for renewable energy proposals.

Policy 61 Telecommunications

Telecommunications development will be permitted provided that:

- a) the development is part of a planned system of provision; and
- b) taking account of opportunities afforded by the shared use of existing masts, antenna or other structures, the least obtrusive or damaging, technically-feasible structure and location can be secured.

Where developments would be visually prominent evidence must be provided to show that alternative locations have been investigated and are impractical. Such proposals will be rigorously examined with regard to siting and design and will be permitted only where there are no unacceptable adverse effects on the special qualities of the National Park.

Where it can be demonstrated that proposals are of national significance, applications should be accompanied by technical and financial feasibility studies.

4.264 This policy is intended to guide telecommunications developments to the least obtrusive location possible, taking into account the technical requirement of each individual application, including its function within the network. Both the individual and cumulative impact of proposals will be of importance. The planned system of provision should include a strategic programme for the location of masts showing how the proposal fits into the network. To assess the proposal under criterion b) applicants will also be required to demonstrate that an appraisal of alternative sites and options has been undertaken, taking into account the possibilities of mast sharing, attachment to a building or other suitable structure when providing a justification for the preferred site. The Authority will expect the information to clearly demonstrate in quantifiable terms why alternative locations or options are impractical relative to the site chosen.

4.265 The effect of telecommunications developments on amenity is an important consideration (see Policy 31).

4.266 The National Park's special qualities are defined in Policy 8. There is a potential for negative impacts on species, (e.g. bats), however a

determination of effect cannot be made without the scale and location of the development being known. Consideration of environmental impacts will include designated sites, such as Natura 2000 sites and undesignated sites.

5. Monitoring

5.1 The Local Development Plan's objectives and policies will be monitored through an Annual Monitoring Report.¹⁷⁶ These reports will monitor progress against key indicators¹⁷⁷ and targets. The report will reflect the success of the Local Development Plan and show if targets are being met. These indicators and targets are in addition to those which are to be used in the Sustainability Appraisal monitoring.




5.2 In the Annual Monitoring Reports the following areas will be covered:

- Key Findings and recommendations
- Significant contextual change
- Policy monitoring

5.3 The analysis will be grouped under the overarching National Park Purposes and Duty (and spatial strategy) and then the six key priority areas:

- Special qualities
- Major development, the potential for growth
- Climate change, sustainable design, flooding, sustainable energy
- Visitor economy, employment, and rural diversification
- Affordable housing and housing growth
- Community facilities, retailing, transport

5.4 First the key outcomes anticipated will be listed under each priority area, and then any significant contextual changes during the year will be analysed. The aim of the monitoring framework (set out below) will be to assess the extent to which policies are being implemented as intended, and whether objectives are being achieved. As a visual aid in monitoring the effectiveness of policies and to provide an overview of performance, key indicators and outcomes are highlighted as follows:

Targets / objectives are being achieved.	
Targets have not been achieved or poor performance, but no concerns over implementation of policy / objectives.	
Monitoring indicates area of concern over implementation of policy / objectives.	

¹⁷⁶ See 6. Glossary of Terms

¹⁷⁷ See 6. Glossary of Terms

5.5 Triggers are included within the policy analysis to ensure that a detailed investigation is undertaken of the effectiveness of the policy when the trigger is met. Any recommendations for a review of the policies or Plan as a result of the detailed assessment will be set out in the Annual Monitoring Report.

5.6 The Annual Monitoring Report will also include an analysis of the effectiveness of policies and Supplementary Planning Guidance when dealing with Appeals. The Annual Monitoring Report will also contain a section on Sustainability Appraisal monitoring and a section which monitors progress with site specific allocations. Any actions needed to address issues will also be set out.

National Park Purposes and Duty and the Spatial Strategy

Policy Area		Indicator 1.	Target
All		Approvals contrary to recommendation.	0 approvals contrary to recommendation.
<p>Trigger: 3% of planning applications¹⁷⁸ decided contrary to recommendation in any one year.</p> <p>Reason: To identify patterns over the Annual Monitoring Report period.</p>			

Policy Area		Indicator 2.	Target
Policy 1		<p>National Park Purposes & Duty: Developments which engage the Sandford Principle – where conflict between the two National Park purposes becomes irreconcilable, the first one must prevail. Carrying out the socio-economic duty in National Parks must be in pursuance of the purposes to Policy 1 (overarching indicator).</p>	<p>Target - 0 approvals within or impacting on the National Park which breach the Sandford principle or which result in conflicts between the duty and purposes. (overarching target)</p>
<p>Trigger: 0 applications approved contrary to the Sandford Principle or which result in conflicts between the duty and purposes in any one year.</p> <p>Reason: The Sandford Principle and the requirement for the duty to be pursuant to the purposes are central components of the National Park purposes and 1995 Environment Act.</p>			

¹⁷⁸ Full, outline or reserved matters applications.

Policy Area	Indicator 3.	Target
Policy 7 Policy 44 Policy 45 Policy 49 Policy 53	Policy 7, Policy 44, Policy 45, Policy 49, Policy 53 - prioritise community uses.	0 approvals contrary to policies.
<p>Trigger: Approval of 2 or more planning applications contrary to a policy in any one year. Reason: The National Park does not contain many sites used for employment or community facilities and any loss to other uses must continue to support the local community. Such sites are valuable to individual communities and a stringent threshold is appropriate.</p>		

2A Special Qualities

Policy Area	Indicator 4.	Target
Policy 8	Special Qualities: Approvals contrary to Strategy Policy 8 Special Qualities. Approvals contrary to Recommendation.	0 approvals
<p>Trigger: 2 developments permitted contrary to any criterion in any one year. Reason: The Special Qualities are central to National Park Purposes set out in the Environment Act 1995.</p>		

Policy Area	Indicator 5.	Target
Policy 14	Welsh Language: Proposals approved contrary to Policy 14	0 approvals
<p>Trigger: 2 or more developments contrary to Policy 14. Reason: To ensure consistency of approach with national planning guidance.</p>		

Policy Area	Indicator 6.	Target
Policy 16	Landscape & Seascape: Proposals contrary to Policy 16	0 approvals
<p>Trigger: 2 or more developments contrary to Policy 16 with its supporting Supplementary Planning Guidance. Reason: The Special Qualities (Environment Act 1995) of the National Park could be significantly affected by such development.</p>		

Policy Area	Indicator 7.	Target
Policy 17	Amount of greenfield and open space lost to development (ha) which is not allocated (for other purposes) in the Plan. Amount of Green Wedge lost.	Greenfield - 0% except for land released in accordance with the Plan's policies.
		Open Space lost - 0 % except where, with playing fields, facilities can be best retained and enhanced through the redevelopment of a small part of the site or alternative provision can be made of equivalent benefit or there is excess provision in the area.
		Green Wedge – 0% lost
<p>Trigger: 1 or more developments granted permission contrary to recommendation in any one year. Reason: The cumulative loss of green field land should be assessed to ensure that</p>		

opportunities for brownfield development are not being overlooked.
The loss of open space unless justified leads to the undermining of the sustainability of local communities.
Local planning authorities should attach substantial weight to any harmful impact which a development would have on a green wedge.

2B Major development, the potential for growth

Policy Area	Indicator 8.	Target
Major development	Approvals of proposals that engage Major Development Test	0 approval of major development unless exceptional circumstances are proven.
<p>Trigger: Approval of 1 major development where no exceptional circumstances are shown in any one year.</p> <p>Reason: To ensure a consistent approach with the first purpose of National Parks and Planning Policy Wales Major Development test.</p>		

Policy Area	Indicator 9.	Target
Minerals	Applications for minerals development	0 approval for new minerals development unless exceptional circumstances are proven.
<p>Trigger: 1 new or extended mineral site permitted when exceptional circumstances are not shown in any one year. The trigger would not include borrow pits.</p> <p>Reason: This would have a major impact on the minerals strategy.</p>		

Policy Area	Indicator 10.	Target
Policy 28, Policy 29	Waste Management Facilities Approvals contrary to the principle of local waste management facilities predominantly serving the National Park area.	0 approvals
<p>Trigger: 2 or more developments contrary to recommendation.</p> <p>Reason: To ensure consistency of approach with national planning guidance by resisting inappropriate or unsuitable waste management facilities within the National Park.</p>		

2C Climate change, sustainable design, renewable energy, flooding

Policy Area	Indicator 11.	Target
Policy 30	Sustainable Design Approvals contrary to Strategy Policy 30 'Sustainable Design' on the grounds of criterion c), e), g), h) or i).	0 approvals.
Trigger: 3 or more decisions contrary to Policy 30 c), e), g), h) or i).		
Reason: To monitor the Plan's contribution to sustainable design in all development.		

Policy Area	Indicator 12.	Target
Policy 34	Renewable Energy Capacity of renewable energy schemes permitted and completed.	<p>Planning permissions to contribute to an overall Renewable Heat Target for the National Park of 9.8 GWh.</p> <p>This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.</p>

Policy Area	Indicator 13.	Target
Policy 34	Renewable Energy Capacity of renewable energy schemes permitted and completed.	<p>Planning permissions to contribute to an overall Renewable Electricity Target for the National Park of 38.9GWh.</p> <p>This target is aspirational, dependent upon a range of factors in the future such as government changes in policy, funding opportunities/constraints, as well as other external factors.</p>

Policy Area		Indicator 14.	Target
Policy 34		Renewable Energy Policy 34 and Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance	All decision making is consistent with the Authority's Renewable Energy Policy as supported by the Renewable Energy Supplementary Planning Guidance and Cumulative Impact of Wind Turbines on Landscape and Visual Amenity Supplementary Planning Guidance
<p>Trigger: 3 or more decisions contrary to Policy 34 Renewable Energy in conjunction with its supporting Supplementary Planning Guidance.</p> <p>Reason: Although the contribution provided by renewables is important it is difficult to monitor (see above). A more meaningful measure is how effective Policy 34 Renewable Energy is and it's supporting guidance. Deciding applications contrary to the Policy as supported by Supplementary Planning Guidance should trigger a review.</p>			

Policy Area		Indicator 15.	Target
Policy 35		Flooding: Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	Development is not permitted where the long term scenario (in the next 100 years) would fail the tests set out across.
<p>Trigger: 1 development permitted contrary to Policy 35.</p> <p>Reason: There can be severe consequences of inappropriate development. This is a Welsh Government indicator.</p>			

2D Visitor economy, employment and rural diversification

Policy Area	Indicator 16.	Target
Policy 39	Recreational Activities: Proposals for recreational activity contrary to Policy 39.	0 approvals
<p>Trigger: 2 or more recreational activity developments contrary to Policy 39 in conjunction with the Recreational Activities Supplementary Planning Guidance.</p> <p>Reason: The special qualities (Environment Act 1995) could be significantly affected by such development.</p>		

Policy Area	Indicator 17.	Target
Policy 40	Hotel Accommodation	Maintain except where loss of hotel proven.
<p>Trigger: 1 or more developments contrary to recommendation in any one financial year.</p> <p>Reason: The impact of such development changes on National Park purposes. There is a need to maintain current provision unless loss is justified.</p>		

Policy Area	Indicator 18.	Target
Policy 41	Self Catering Development: Prioritising affordable housing over self-catering.	Target - 0 approvals contrary to policies that prioritise certain uses seen to sustain communities in the Plan.
<p>Trigger: Approval of 2 or more applications contrary to Policy 41 in any one year.</p> <p>Reason: This policy provides a windfall opportunity for affordable housing and with limited land available for development early scrutiny of the policy is appropriate.</p>		

Policy Area	Indicator 19.	Target
Policy 42	Caravan & Camping Proposals contrary to Policy 42.	0 approvals

Trigger: 2 or more developments contrary to the Policy 42 with its supporting Supplementary Planning Guidance.

Reason: The Special Qualities (Environment Act 1995) of the National Park could be significantly affected by such development.

Policy Area		Indicator 20.	Target	
Policy 44 Employment		Proposals for employment	Authority decisions are consistent with Policy	0 Approvals

Trigger: 1 or more applications are approved contrary to recommendation.

Reason: To analyse the effectiveness of the Policy.

Policy Area		Indicator 21.	Target
Policy 45		Loss of employment sites	0 approvals of loss of employment sites except where justified within the terms of the policy.

Trigger: Loss of two or more employment sites or 500 sq. metres contrary to recommendation.

Reason: Small employment sites can make an important contribution to sustainable communities.

2E Affordable housing and housing growth

Policy Area		Indicator 22.	Target
Housing		The housing land supply taken from the current Housing Land Availability Study (TAN1)	Minimum 5 years effectively available supply.
<p>Trigger: Less than a 5 year supply in any one year.</p> <p>Reason: It is important to deliver the affordable housing strategy.</p>			

Policy Area		Indicator 23.	Target
Policy 47, Policy 48, Policy 49,		The number of net additional affordable and general market dwellings built (TAN 2).	710 general market dwellings built over the Plan period to support the provision of 250 affordable dwellings built over the Plan period.
<p>Trigger: Completions 10% below the target expected by the formal Plan review period. Undertake research to establish reasons and dependent on findings consider whether actions are necessary to increase supply.</p> <p>Completions 25% less than targets – determine actions to increase supply of affordable housing, including consideration of additional housing allocations.</p> <p>Reason: The delivery of affordable housing is a key outcome of the Plan. To allow land that can deliver affordable housing an opportunity to come forward means an assessment at this stage would be appropriate.</p>			

Policy Area		Indicator 24.	Target
Policy 49		House Prices, Build costs, Affordable rents	Targets for affordable housing delivery for each local market housing area are maintained.

The following key indicators will be monitored:

- a) House prices – data which includes second hand as well as new properties and provides a robust indicator of price trends.
- b) Build costs – Pembrokeshire benchmark build costs and relevant BCIS index; and,
- c) Affordable rents – Local Housing Allowance data.

Trigger: The Authority will consider if there is a 10% change (plus or minus) in any one indicator sustained over a 12 month period or if:

- a) There is a plus or minus change of between 5-9% in any two indicators sustained over a 12 month period; or,
- b) There is less than 10% change in indicator(s) but change is being sustained or if evidence indicates that sustained change has occurred in other development costs e.g. finance costs, developer return required.

This assessment will be carried out annually and published in the Annual Monitoring Report on the Authority's website. The Authority will consider if changes are needed and whether this would require a selective review in advance of the 4-yearly formal requirement. An analysis will be undertaken for each Annual Monitoring Report.

Reason: The delivery of affordable housing is a key outcome of the Plan but must take account of economic circumstances.

Policy Area	Indicator 25.	Target
Policy 51	Gypsy and Traveller and Show People Sites: Proposals for sites contrary to Officer recommendation.	Authority decisions are consistent with Policy.

Trigger: 1 or more applications are approved contrary to recommendation.

Reason: To analyse the effectiveness of the Policy.

Policy Area	Indicator 26.	Target
Policy 50	Average density of housing development permitted in Centres.	30 per hectare target in the Plan's Centres achieved.

Trigger: 2 or more housing developments not achieving 30 dwellings to the hectare unless an alternative density is justified under Policy 50.

Reason: To make the best use of available land.

Policy Area		Indicator 27.	Target
Policy 50		Mix of housing types to create balanced communities.	Authority decisions are consistent with Policy.
<p>Trigger: 2 or more housing developments approved contrary to the last paragraph of Policy 50.</p> <p>Reason: To achieve the objective of balanced mixed and sustainable communities.</p>			

2F Community Facilities, Retailing and Transport

Policy Area	Indicator 28.	Target
Policy 53	Community Facilities & Infrastructure Requirements.	Authority decisions are consistent with Policy.
<p>Trigger: Approval of 1 or more planning applications contrary to Policy 53 in any one year.</p> <p>Reason: Any loss of a community facility that is not justified as required by Policy 53 needs to be investigated. Facilities are valuable to individual communities and a stringent threshold is appropriate.</p>		

Policy Area	Indicator 29.	Target
Policy 53	Number of Planning Obligations for community facilities secured from development (or financial contributions).	S106 agreements secured in line with Supplementary Planning Guidance
<p>Trigger: 2 applications decided contrary to the recommendation in any one year.</p> <p>Reason: To secure improvement in community facility provision where the requirement arises from the development.</p>		

Policy Area	Indicator 30.	Target
Policy 54, Policy 55	Retail Hierarchy	Authority decisions are consistent with policy
<p>Trigger: 1 or more developments approved contrary to recommendation in any one year for either Policy 54 or Policy 55.</p> <p>Reason: The aim of these policies is to ensure that that the Plan's Centres continue to remain attractive places to live and visit and provide a valuable role in meeting the needs of local communities and visitors.</p>		

Policy Area	Indicator 31.	Target
Policy 54	Percentage of vacant retail floor space.	No greater than 10%.
<p>Trigger: Greater than 10% vacant A use class floor space within retail centres for 2 consecutive years.</p> <p>Reason: Vacancy in centres naturally fluctuates and allows for new ventures to come</p>		

forward. Sustained relatively high vacancy for National Park centres should be assessed further.

Policy Area	Indicator 32.	Target
Policy 57	Transport: Approvals for development causing significant concerns regarding potential transport impacts.	0
Trigger: 1 or more applications approved contrary to recommendation. Reason: Significant concerns will impact on communities and will require further assessment.		

Supplementary Planning Guidance

Policy Area	Indicator 33.	Target
Supplementary Planning Guidance	To adopt Key Supplementary Planning Guidance within 1 year of the Plan's adoption.	0
<p>Trigger: 1 or more guidance documents are not adopted within 1 year of the Plan's adoption.</p> <p>Reason: The Supplementary Planning Guidance listed is key to the delivery of the Plan's strategic policies.</p>		
Key Supplementary Planning Guidance	Background Paper or Local Development Plan 1 Guidance	
Accessibility	Accessibility Supplementary Planning Guidance adopted June 2013	
Landscape Character	Landscape Character Supplementary Planning Guidance adopted June 2011	
Seascape Character	Seascape Character Supplementary Planning Guidance adopted December 2013	
Renewable Energy	Renewable Energy Supplementary Planning Guidance adopted April 2014	
Caravan Camping and Chalets ¹⁷⁹	Caravan, Camping and Chalet Landscape Capacity Assessment	
Affordable Housing (joint guidance with Pembrokeshire County Council anticipated)	Affordable Housing Supplementary Planning Guidance adopted November 2014	
Planning Obligations (joint guidance with Pembrokeshire County Council anticipated)	Planning Obligations Supplementary Planning Guidance adopted September 2016	

¹⁷⁹ See footnote to Policy 42 Caravan, Camping and Chalet Development for types of development.

6. Glossary of Terms

Term Used	Explanation
Accessibility	The extent to which a property, locality or facility is readily approachable and usable by as many people as possible, including individuals with disabilities.
Adopted	The final confirmation of the Plan or Supplementary Planning Guidance or Strategy.
Affordable housing	Affordable housing is housing for sale or rent at prices below the market rate. It will be reserved in perpetuity by the use of Section 106 agreements or conditions as affordable housing where a private developer is involved. Housing Associations will not be required to enter into such obligations but may wish to enter into voluntary lettings agreements. Affordable housing will be provided for local people in unsuitable housing who cannot afford to resolve their housing needs in the open market.
Affordable Housing Need	Assessed by examining the suitability of present housing and the ability of households to afford market priced housing.
Affordable housing exception sites	These are small housing sites within or adjoining Centres for the provision of affordable housing to meet local needs. The affordable housing provided on exception sites should meet the needs of local people in perpetuity. Sites must meet all the other criteria against which a housing development would be judged. Affordable housing exception sites are not appropriate for market housing.
Allocation	Land which will be proposed for development or restraint, which will be identified in a Proposals Map in the Deposit and the Adopted versions of the Local Development Plan.
Annual Monitoring Report (AMR)	This will assess the extent to which policies in the Local Development Plan are being successfully implemented.
BREEAM	The BREEAM family of assessment methods and tools are all designed to help construction professionals understand and mitigate the environmental impacts of the developments they design and build.
Brownfield Site/ Land (Previously Developed Land)	See Planning Policy Wales Edition 9 (2016), Figure 4.4
Candidate Site	Candidate Sites are those nominated by anyone for consideration by the local planning authority as allocations in the Local Development Plan.
Candidate Site Register	Register of candidate sites prepared following a call for candidate sites by the local planning authority.
Case-by-case basis	Considering or dealing with each instance separately,

Term Used	Explanation
	taking into account its individual circumstances and features.
'Centre'	Means either a 'Local Service and Tourism Centre' or a 'Local Centre' or a 'Rural Centre'.
Community Facilities	Community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. Facilities are usually located within a village or town that is regularly used by the local community. These can include convenience shops, public houses, cinemas, petrol filling stations, children's formal play areas, playing fields, doctors' surgeries, schools, village/community halls, nursing homes, churches, allotments, etc.,
Conserve	To keep from harm, decay or loss.
Consultation	A formal process in which comments are invited on a particular topic or set of topics, or a draft document.
Cultural Heritage	The cultural heritage of Pembrokeshire Coast National Park includes all evidence of past human activity, as well as people's responses to, and associations with those activities. It includes the aesthetic appreciation as well as the physical evidence of people's activities, and is embodied in language, art, and the meaning and interpretation which we give to our landscape and historic environment. It is all around us, providing a context for our daily lives and influencing regional and local identity.
Delivery Agreement	A document comprising the local planning authority's timetable for the preparation of the Local Development Plan together with its Community Involvement Scheme, submitted to the Welsh Government for agreement.
Deliverability	Where a site is realistically expected to be developed in the Plan period. It is important to be able to demonstrate that there are no fundamental impediments to the development of the sites allocated in the Plan and to be able to specify the timescales within which constraints will be overcome.
Deposit Plan	A formal stage during which organisations and individuals can make representations on the detailed policies and proposals.
Employment Land / Site	Land that typically forms part of an industrial estate or business park, which is occupied by one or more of the following: offices, manufacturing, research and development, storage and distribution.
Enhance	To improve, heighten or intensify.
Evidence	Base Interpretation of the present state of an area (i.e. baseline) or other information/ data to provide the basis for planning policy and against which to measure change.
Greenfield Sites	These are sites which have never been previously

Term Used	Explanation
	developed or used for an urban use, or are on land that has been brought into active or beneficial use for agriculture or forestry i.e. fully restored derelict land.
Greenways	Pembrokeshire Greenways is a partnership initiative to promote access and enjoyment for all by bus and train travel, walking, cycling and horse riding rather than by the use of the private car. It comprises public and community bodies involved with the promotion and delivery of sustainable travel in Pembrokeshire and includes the National Park Authority, Pembrokeshire County Council, Natural Resources Wales, Public Health Wales, Pembrokeshire Tourism, Pembrokeshire Access Group and Sustrans.
Green Infrastructure	Green Infrastructure is a network of multi-functional green space, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and the quality of life of sustainable communities. Green Infrastructure also encompasses river systems and coastal environments.
Historic Environment	The historic environment of the Pembrokeshire Coast National Park encompasses all those material remains that our ancestors have created on land and coast. It ranges from historic landscapes, parks and gardens, distinctive field patterns and thoroughfares through to historic settlements, traditional buildings, ancient monuments and buried archaeological sites. It provides a constant reminder of past human enterprise, a source of enjoyment and learning and combines with the natural environment and habitats of the National Park to give us a unique sense of place, daily inspiration and an important asset for the future.
Implementation	Implementation is the carrying out, execution, or practice of a plan, a method, or any design for doing something. As such, implementation is the action that must follow any preliminary thinking in order for something to actually happen.
Indicator	An indicator is something that helps you understand where you are, which way you are going and how far you are from where you want to be. A good indicator alerts you to a problem before it gets too bad and helps you recognise what needs to be done to fix the problem.
Infrastructure	Water supply and sewerage facilities, roads and transportation, local community, shopping and other facilities required as framework for development.
Intervisible	Mutually visible. Each in sight of the other.
Landscape Capacity	The ability of the National Park landscape to absorb development for this Plan period is tested using the methodology set out in the Background Paper

Term Used	Explanation
	'Candidate Site Assessment Methodology.
Landscape Sensitivity Assessment	Advises on the sensitivity of landscape areas to different scales of development.
Local Development Plan (LDP)	The required statutory development plan for each local planning authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004. The Local Planning Authorities (LPAs) have to set out their objectives in relation to development and use of land in their area and set out the general policies for the implementation of those objectives within their Local Development Plans. As well as having regard to national planning policy, the local planning authority has to take into account of regional planning policy and the authority's community strategy and the social, economic and environmental factors relating to the local area and global environment, by undertaking a sustainability appraisal of the Local Development Plan.
Local Wellbeing Plans	Under The Well-being of Future Generations (Wales) Act 2015 Public Service Boards will be established for each local authority area; it is intended that each will prepare a Well-being Plan by April 2018 (s.39).
Marine Conservation Zone	An area of national or international importance for the purpose of conserving especially important marine habitats and wildlife and other features along the foreshore and seabed.
Mitigation	Measures that avoid, reduce, remediate or compensate for the negative impacts.
Natura 2000 Sites	<p>Natura 2000 is a European network of protected sites which represent areas of the highest value for natural habitats and species of plants and animals which are rare, endangered or vulnerable in the European Community.</p> <p>The Natura 2000 network includes two types of area. Areas may be designated as Special Areas of Conservation (SAC) where they support rare, endangered or vulnerable natural habitats and species of plants or animals (other than birds). Where areas support significant numbers of wild birds and their habitats, they may become Special Protection Areas (SPA). SACs are designated under the Habitats Directive and SPAs are classified under the Birds Directive. Some very important areas may become both SAC and SPA.</p>
Retail Hierarchy	Planning Policy Wales requires development plans to establish a local retail hierarchy which identifies the nature, type and strategic role to be performed by retail and commercial centres.
Single Integrated Plan	Discharges statutory duties identified by Welsh Government ("Shared Purpose – Shared Delivery",

Term Used	Explanation
	WG 2012), including Community Strategies; prepared by a Local Service Board. See “Local Well-being Plans” which are to replace Single Integrated Plans”.
Site of Special Scientific Interest (SSSI)	A conservation designation denoting a protected area in the United Kingdom. SSSIs are the basic ‘building block’ of nature conservation legislation, and most other legal nature/geological conservation designations are based upon them, including National Nature Reserves, Ramsar Sites, Special Protection Areas, and Special Areas of Conservation.
Special Area of Conservation (SAC)	Designated under the European Directive on the Conservation of Natural Habitats and Wild Flora and Fauna for the conservation of sites of international conservation importance.
Special Protection Area (SPA)	Designated under the European Directive on the Conservation of Wild Birds for the protection of wild birds and their habitats.
Soundness	A concept comprising procedure, consistency, coherence and effectiveness against which a local development plan will be examined by an independent Planning Inspector.
Stakeholders	Interests directly affected by the Local Development Plan – involvement generally through representative bodies.
Statement of Common Ground	The purpose of a Statement of Common Ground is to establish the main areas of agreement between two or more parties on a particular issue.
Strategic Environmental Assessment (SEA)	Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes.
Strategy	A strategy is a long term plan or method designed to achieve a particular goal or objective.
Supplementary Planning Guidance (SPG)	Supplementary information in respect of the policies in a Local Development Plan. Supplementary Planning Guidance does not form part of the Development Plan and is not subject to independent examination but must be consistent with the Plan and with national policy.
Sustainability Appraisal	A Sustainability Appraisal is an appraisal of the economic, environmental, and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Sustainable Development	“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the Welsh Government’s well-being goals.

Term Used	Explanation
	Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.
Trajectory (Housing)	For market and affordable housing the trajectory illustrates the expected rate of housing delivery.
Transport Assessment	These provide the information necessary to assess the suitability of an application in terms of travel demand and impact. The assessment should set objectives and targets relating to managing travel demand for the development and set out the infrastructure, demand management measures and financial contributions necessary to achieve them. (See Technical Advice Note 18: Transport (March 2007) for further information.)
Unacceptable adverse effect	An unacceptable harmful impact that cannot be satisfactorily mitigated.
Utilities	Services provided such as water supply, sewerage, gas and electricity.
Use Class Order	Class A1 Shops of all types including superstores and retail warehouses; also includes hairdressers, sandwich bars (except those selling hot food), travel agents, laundrettes, dry cleaners, showrooms, except car showrooms.
	Class A2 Financial and Professional Services to visiting members of the public, including banks, building societies, estate agents, betting offices.
	Class A3 Food and Drink including restaurants, pubs, wine bars, and takeaways.
	Class B1 Business Class including offices (other than those falling in Class A2), research and development, and industrial processes, provided the use could be carried out in any residential area without detriment to amenity by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.
	Class B2 General Industrial processes other than ones falling into Class B1.
	Class B8 Storage and Distribution warehouses including wholesale cash and carry.
	Class C1 Hotels
	Class C2 Residential Institutions including hospitals, nursing homes, residential schools and colleges.
	C2A Secure Residential Institution Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody

Term Used	Explanation
	centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.
	Class C4 Houses in multiple occupation Use of a dwelling house by not more than six residents as a house in multiple occupation. In broad terms, this use occurs where tenanted living accommodation is occupied by 3 to 6 people as their only or main residence, who are not related and who share one or more basic amenities.
	Class D1 Non-residential Institutions including religious buildings, public halls, museums, medical services.
	Class D2 Assembly and Leisure including cinemas, bingo halls, casinos and indoor sports.
	Sui Generis Many uses do not fall within any Use Class and are therefore described as <i>Sui generis</i> - a class on their own. For example, theatres, amusement centres, car showrooms, petrol filling stations, and car hire offices are among uses which are specifically excluded from any of the defined Classes.
Wales Spatial Plan (WSP)	A plan prepared and approved by the National Assembly for Wales which sets out a strategic framework to guide future development and policy interventions, whether or not these relate to formal land use planning control. Local development plans must have regard to the Wales Spatial Plan.
Waste Management Facilities	Facilities for storing, sorting, treating and disposing or waste. They include, for example, Household Recycling Centres, waste transfer stations, landfill sites, composting facilities and various methods of recovering energy.
Windfall	The term 'windfall sites' is used to refer to those sites which are considered appropriate for development but have not been specifically identified on the Proposals Map.
Workaday	Relating to or suited for ordinary working days.

Appendix 1 Land with Planning Permission or Development Consent Order

Below is a list of planning applications which were granted planning permission between April 2012 and April 2017 which were advertised as 'major development' in accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. These planning permissions are shown on the Proposals Map.

"Major development" means development involving any one or more of the following—

- (a) the winning and working of minerals or the use of land for mineral-working deposits;
- (b) waste development;
- (c) the provision of dwelling houses where —
 - (i) the number of dwelling houses to be provided is 10 or more; or
 - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- (e) development carried out on a site having an area of 1 hectare or more.

Also shown are Nationally Significant Infrastructure Projects with a Development Consent Order which was extant as at April 2017.

Ref:	Description	Permission Date
NP/13/0441	Demolition of existing motel & replace with 40 bed hotel with adjoining restaurant & associated parking & landscaping – Roch Gate Motel, Roch	30/01/2015
NP/14/0574	Construction of new reinforced concrete foundation to support a 15m tower, the erection of a 15m high triangular lattice steel tower, installation of ground level access ducting and construction of a new concrete plinth (approx. 3m x 4m) – Maritime & Coastguard Agency Radio Site, Monkstone Point, Saundersfoot	30/01/2015
NP/15/0085	Change of use of fort & island to visitor attraction uses including C1, D1 and D2 with gift, food & drink & retail uses A1 and A3. Change of use of generator house to ticket and retail use A1 & A3. Restore/replace railings, install 2 cranes, 2 boat landings, construct security residence use C3, construct toilet & pumping facilities, install cliff nature walk, signage, path lighting, operations lighting, replace fort entrance bridge, install services, repair stairs & install new, install CCTV – St Catherines Island, Tenby	06/07/2015

Ref:	Description	Permission Date
NP/15/0086	Cattle accommodation building & open yard area – Velindre, St Nicholas	14/07/15
NP/15/0145	10 dwelling houses – Old Cottage Hospital site, Trafalgar Road, Tenby	28/09/15
NP/15/0194	Residential development of 35 dwellings (including 14 affordable units) incorporating open space & new access points of Feidr Eglwys and Feidr Bentinck – land off Feidr Eglwys, Newport	20/06/16
NP/15/0693	One Planet Development including a single family dwelling – Land at Carn Ingli, Newport	25/07/16
NP/16/0170	Construction of new Marine Centre, including marine workshops, marine/outdoor action retail, cafe & restaurant, offices for harbour administration & Wales Tourism, RYA Academy, Teaching Rooms, Coastal Storm Education Centre, bedrooms & disabled accommodation – Harbour Office, The Harbour, Saundersfoot	01/07/16
NP/16/0219	New housing development of 13 units – land adjacent to Primary School, Trewarren Road, St Ishmaels	20/09/16
NP/16/0266	Redevelopment & relocation of 117 existing bases & creation of 58 additional bases for static visitor caravans; reduction in number of touring & tent pitches; removal of 11 existing staff caravans & their utility connections; creation of 2 bases for static caravans for staff, demolition of shop (and relocation to Entertainment Complex) & removal of laundrette; relocation of maintenance block & service yard; removal of car parking spaces totalling 94 spaces & creation of car park spaces totalling 138 spaces; upgrading of pedestrian access to the park & ride for access into the town centre; works to & extension of existing attenuation pond; removal of crazy golf facility; relocation of play area & associated landscaping, drainage & access infrastructure works – Kiln Park Holiday Centre, Tenby	10/05/17
Statutory Instrument 2014 No. 2846	The South Hook Combined Heat and Power Plant Order 2014. The authorised development must commence within 5 years of the date of this Order.	23rd October 2014

Pembrokeshire Coast National Park

Replacement Local Development Plan (end date-2031)

Deposit

Sustainability Appraisal
Non-technical Summary

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

NPA 28th March 2018

Context

1.1 European Directives and United Kingdom legislation require that land use plans produced by Local Planning Authorities are subject to an assessment of their sustainability and likely effect on the environment. This is to ensure that the Plan contributes towards the goal of sustainable development. The assessment forms part of plan making through processes typically referred to as *Sustainability Appraisal* and *Strategic Environmental Assessment* or a combination of the two. The sustainability of the Pembrokeshire Coast National Park Replacement Deposit Local Development Plan has been assessed through a process of Sustainability Appraisal incorporating a Strategic Environmental Assessment.

Sustainability Objectives

1.2 For the purposes of the Sustainability Appraisal of the Pembrokeshire Coast National Park Replacement Deposit Local Development Plan, in accordance with guidance from the Welsh and United Kingdom Governments, sustainability is defined in terms of a sustainability framework made up of sustainability objectives. These were subject to public consultation and are:

- i. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well-being.
- ii. Locate developments so as to minimise the demand for travel, especially by private car.
- iii. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park.
- iv. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.
- v. Increase the number of visitors using the National Park outside the peak visitor season.
- vi. Manage the effects of climate change with particular reference to the risk of flooding, the effect on biodiversity and public health.
- vii. Reduce factors contributing to climate change.
- viii. Maximise the contribution of the limited opportunities for development to sustaining local communities.

- ix. Encourage access for all to the National Park, reflecting the social mix of society.
- x. Maintain the cultural distinctiveness of communities.
- xi. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.
- xii. Reduce the negative impacts of waste.
- xiii. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population.
- xiv. Maintain and enhance biodiversity both within and outside designated sites.
- xv. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.

1.3 More information on the development of the Sustainability Objectives is included in section 4 of the Draft Initial Sustainability Appraisal Report.

What would happen in the absence of the Local Development Plan?

1.4 Guidelines for Sustainability Appraisal and the Strategic Environmental Assessment Directive require that the appraisal includes a forecast of the likely sustainability outcomes in the absence of the Plan – the 'business as usual' scenario. Understanding the likely future evolution of the area in the absence of the Plan is important for determining the impact of the Plan. Also, if the Plan outcomes were forecast to be no better, or worse, than the business as usual scenario, this would provide a clear indicator that the Plan needed significant improvement.

1.5 In forecasting the business as usual scenario it is first necessary to determine what that means. The absence of the Plan has been taken to mean a continuation of Adopted Local Development Plan, though as this Plan moves towards and passes its end date (2021), it is likely to become less relevant and useful, and decisions will need to be made according to National policy only (see Section 4, page 21 of the Sustainability Appraisal Report for the predicted sustainability effects).

Appraisal of Local Development Plan Objectives and Policies

1.6 Generally the objectives for the Local Development Plan are found to be compatible with the Sustainability Objectives. Sometimes some uncertainty remains because the Plan will not operate in isolation and it is not possible to determine how the factors that are the subject of the Plan objective will interact with the factors that are the subject of the Sustainability Objective in every circumstance.

1.7 The detailed policies of the Local Development Plan were assessed to predict their impacts with regard to the Sustainability Objectives. Where the appraisal raised questions regarding the sustainability of a policy, or where the appraisal identified opportunities to further increase the sustainability benefits of a policy, a recommendation for change was made.

1.8 Sustainability Appraisal has been part of the process for creating the Local Development Plan from the start and because of this most policies are, by this stage, as sustainable as they can be. No further opportunities for improvement were identified during the development of the Deposit Plan.

What will be the cumulative impacts of the Plan's proposals?

1.9 It is a requirement of Sustainability Appraisal and Strategic Environmental Assessment that policy options are not only considered singly, but that their cumulative effects are also assessed. The net impact of all policies was determined against each Sustainability Objective. From this exercise it was found that there are no undesirable cumulative effects on any of the Sustainability Objectives.

Sustainability Appraisal of Local Development Plan
development allocations

1.10 Sustainability Appraisal, against the Sustainability Objectives, formed part of the evaluation process for the selection of potential development allocation sites. Of the 152 sites submitted through the candidate site process 28 were considered for allocation in the Replacement Deposit Local Development Plan, of these 16 were chosen.

How will other plans impact?

1.11 Other plans are also likely to influence the effects of the Pembrokeshire Coast National Park Replacement Local Development Plan. Most notable of these are the Wales Spatial Plan and the Development Plans for Pembrokeshire, Ceredigion and Carmarthenshire. The Sustainability Appraisal of the Wales Spatial Plan identified mitigation measures to ensure that any negative effects of the spatial strategy are minimised or avoided and these are incorporated into the Local Development Plan. A further key interaction with neighbouring Authorities concerns the complementarity of their nature, the National Park as a key area for recreation, and neighbouring areas providing greater amounts of housing and employment opportunities.

APPENDIX 3

Equality Impact Assessment Summary Report: Preferred Strategy Deposit Local Development Plan 2 documents

Equality Impact Assessments and Methodology Used

1. The specific equality duties in Wales are set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011. They place a duty on Pembrokeshire Coast National Park Authority to assess and consult on the impact its proposed policies will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) and its ability to meet the public sector equality duty. In assessing impact the Authority must consider relevant evidence in order to understand the likely or actual effect of policies and practices on protected groups. It must consider taking action to address any issues identified such as, addressing negative impacts, where possible. The Authority must have 'due regard' to the results of this process.¹
2. Equality Impact Assessments (EqIA) are a systematic way of meeting this duty. For further information on Equality Impact Assessments please visit <http://www.eiapractice.wales.nhs.uk/home>
3. The Authority has an Equality Impact Assessment template proforma for assessments. This template and process has been modified due to the nature of the Local Development Plan and plan making process to include the following stages:

Context setting: Information on Local Development Plan review process and wider policy framework it operates in (EIA Pages 4-9).
Review of the evidence base: Consideration of quantitative and qualitative sources and their relevancy to the Local Development Plan review to form basis for identifying impacts for the Assessment (EIA Pages 10-45).
Assessing potential Impact and action planning: Officers provided responses to impacts identified and sought further information or clarification where needed. A number of actions were identified during this process (EIA Page 67). A summary of the officer responses to impacts identified are attached as Appendix 1.
Equality Impact Summary Report : Produced for Members' Consideration
Consultation on Preferred Strategy: Questions on the Equality Impact Assessment were included within the questionnaire. Equality organisations and community groups were included within the list of consultees contacted. Consultation responses were reviewed to identify relevant comments for the EIA. Officers are provided responses to additional impacts or issues identified through consultation comments. These responses will be noted in the assessment (EIA Page 45).
Monitoring and Review: The content of the Assessment has been reviewed following feedback gathered from the Preferred Strategy consultation.
Declaration: This will be signed following completion of the above stages.

¹ EHRC, 4. Assessing Impact: A guide for listed Public Authorities in Wales:
<http://bit.ly/2jqrMoo>

Appendix 1(to the Equalities Impact Assessment Summary document)

For background information and analysis of evidence base and impacts please see the full Equality Impact Assessment document.

How could, or does, the policy help advance / promote equality of opportunity?

Accessible facilities and neighbourhoods (Age, Pregnancy and Maternity)

1. The Plan's Spatial strategy seeks to focus development in locations that have facilities and are supported by a public transport network (see the Plan's Vision and Spatial Strategy). Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote specific sustainable design elements such as legible layouts that are pedestrian friendly, accessible buildings, natural surveillance and open spaces. The Plan seeks to safeguard community facilities. Policies 53 and 54 provide a supportive context for this provision. National planning policy allows for the development of affordable housing in areas without access to public transport.
2. The Authority has adopted Supplementary Planning Guidance on Parking which requires the appropriate levels and type of parking facilities for each development type, taking into account users of the development and availability of public transport. The Guidance will be updated for the Replacement Plan.

Addressing Public Health Considerations where possible (Age)

3. The Plan's spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Policies seek to conserve key attributes of the natural environment that promote healthy environments, promote pedestrian-friendly layouts and provide and protect open spaces for recreation. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable that would adversely affect public amenity would not be supported. The Plan also seeks to safeguard community facilities. The Plan would however have little/no impact on food choice.

Land use policy encouraging a range of job opportunities available to young people in local areas, taking into account accessibility and transport considerations (Age)

4. The Plan allows for small-scale provision of land for employment uses in or adjacent to the defined Centres where public transport availability is more prevalent. Taking into account the rural nature of the National Park, the Strategy also allows for the extension of businesses into the countryside. The Strategy also allows for some development of the visitor economy which is a major employer in the area and supports the town centres for retailing and commercial uses.

Consultation elements within the Delivery Agreement (Disability)

5. Pembrokeshire Access Group and other disability groups were consulted as part of the wider consultation. Reasonable adjustments and accessibility are taken into account when public consultation events are held. A summary of the Preferred Strategy was made available in Easy Read (following advice from Pembrokeshire People First). The Authority is applying guidance from Diverse Cymru's Advice Guide: Making Documents Accessible, to the formatting of the Deposit Plan. The Authority applied the guidance to the preparation of the preferred strategy.² The Authority will respond to reasonable adjustment requests as they are made. Details will be included in the Local Development Plan document of whom to contact in the Authority to request the Local Development Plan documents in an alternative format. Requests will be considered on the basis of reasonability. Disabled people can experience discrimination if an organisation doesn't make a reasonable adjustment. This is known as a 'failure to make reasonable adjustments'. What is reasonable depends on a number of factors, including the resources available to the organisation making the adjustment.

Land use policies that have positive impact on health and wellbeing outcomes (Disability, Gender Reassignment, Gender, Sexual Orientation)

6. The Plan includes policies for the protection of open space, including recreational open space and allotments and the Park's special qualities which are beneficial for the health and wellbeing of people. The Community Facilities section is supportive of protecting and providing community facilities; and ensuring that there are opportunities taken to promote sustainable travel choices.

Access considerations to greenspaces, active walking opportunities and allotments (Disability, Gender)

7. The removal of barriers linked to existing development are generally not within the remit of land-use planning. However design and layout of new developments will need to take accessibility for all into account.

Promotion of Accessible design features at a street and neighbourhood level to remove active travel barriers for disabled people (Disability)

8. The Plan's Spatial strategy seeks to focus development in locations that have facilities accessible by means other than private car. Promoting pedestrian/wheelchair friendly environments and routes that link to existing services/facilities forms normal Development Management practice when considering the suitability of a proposal in terms of sustainable design. Consulting the Highways Authority and Access Officer informs this process for specific proposals. However over engineered environments in this respect can reduce the aesthetical quality and specific character of developments. These impacts therefore need to be balanced.

² Diverse Cymru, Advice Guide: Making Documents Accessible - <http://bit.ly/2kxesTc>

Public and Private Transport Links within the Park linked to wider Pembrokeshire and Regional networks (Gender Reassignment, Religion, Sexual Orientation)

9. The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. The provision of public transport is outside the remit of land use planning. However, Policies 57 and 58 provide a supportive framework for considering land use related proposals to improve transport links and accessibility.

Location of developments in terms of public transport links, proximity to child care facilities and employment, health and community facilities and shops (Gender, Gender Reassignment, Pregnancy and Maternity, Sexual Orientation)

10. The Plan Strategy allows for new and extended community facilities where they are well-located to meet the community's needs. The Plan seeks to promote sustainable travel choices by permitting facilities to improve public transport linkages. Spatial strategy promotes access to facilities through seeking to locate development in accessible locations.

A need to consider potential community infrastructure needs at a spatial level within Tenby and Saundersfoot (Race)

11. The Plan includes a supportive policy (Policy 53) for the protection and provision of community facilities. Proposals coming forward can be considered in this context. There were no proposals for specific allocations in the Plan when the candidate site process was undertaken so no needs can be specifically reflected in Policies 2 and 4 and 53.

Protection of historic buildings and sites through land use policy (Religion)

12. National planning policy seeks to conserve the architectural merit of buildings or sites of religious importance that are listed or are within Conservation Areas. Local Development Plan Policy 15 seeks to conserve those buildings that are not listed, but are still of local importance. Many buildings or sites of religious importance would also be protected as community facilities under Local Development Plan Policy 53.

How could / does the policy / decision help to eliminate unlawful discrimination, harassment or victimisation?

A need to ensure that Gypsies and Travellers seeking permission for private sites are treated fairly under Policy 51 (Race)

13. The approaches between Pembrokeshire County Council's Local Development Plan and the National Park Local Development Plan have been checked and the same considerations are included between the policy wording and the reasoned justification. It has been agreed to include a monitoring indicator to consider issues arising where 1 or more applications are approved contrary to recommendation. In addition the Monitoring framework for the Local

Development Plan ensures that the effectiveness of policies at appeal are also analysed.

Policy 42 (Race)

14. Consideration has been given to how Policy 42 interrelates and impacts on Policy 51 and enforcement related to unauthorised Gypsy and Traveller Sites. Occupancy controls for holiday accommodation are different than those for Gypsy Traveller sites. An issue arising for the 2 unauthorised sites would most likely be equally problematic for a new caravan and camping sites. The issue related to the effect on the character and appearance of the area. Criterion a) of Policy 42 requires caravan and camping proposals to be assimilated into the landscape. Pembrokeshire Gypsy Traveller Accommodation Needs Assessment Group was contacted but no feedback was provided. The Group and Gypsies and Traveller communities had an opportunity to provide comment as part of the wider consultation on the Preferred Strategy.

How could/does the policy impact on advancing / promoting good relations and wider community cohesion?

Secure by Design (Disability, Gender Reassignment, Gender, Race, Religion or Belief, Sexual Orientation)

15. Secure by Design principles form part of the overall sustainable design considerations for development proposals, including those proposals that may exacerbate existing issues. The Authority consults Dyfed Powys Police who advise on individual proposals. Key principles include the promotion of natural surveillance over public areas and the prevention of dark, unused corners/routes. There is however a need to balance security design features with the overall impact upon street character and attractive, inclusive public realms.

A need to protect space for social infrastructure, including places of worship (Religion)

16. Policy 53 Community Facilities & Infrastructure Requirements provides a supportive policy framework.

Addressing any unacceptable adverse impact

What practical changes/actions could help reduce or remove any negative impacts identified? If no action is to be taken, this needs to be justified

Meeting the needs of an ageing population in terms of suitable accommodation (Age)

17. This issue was highlighted in consultation responses to question 1 of the Preferred Strategy with reference made to the 'All party Parliament group report on housing for older people' and its recommendations for Planning Authority's in

relation to older people housing. One consultation highlighted this in the context of Newport.

18. Officers noted in their response the relevant recommendations for authorities:
 - Councils need to ensure their Local Plan gives the necessary priority to older people's housing needs – not least as a core component of any new settlements and that new developments of retirement housing embrace HAPPI design principles.
 - Exemption of retirement housing from the requirement to build Starter Homes – or to pay a commuted sum in lieu – would provide the opportunity to prioritise this age group.
19. The current housing market assessment only takes into account bedroom numbers. It would include any older person's needs but is not separately identified.
20. There are limitations on the ability to influence the mix of housing. Beyond providing a suitable layout where a mix of dwellings normally provides for a better layout the planning authority can only seek to achieve an element of affordable housing to meet the need as shown in the Local Housing Market Assessment. The Housing Market Assessment provides numbers for overall affordable housing need. The mix (i.e., providing suitable properties for older people) comes when need is addressed for an individual project by the housing authority.
21. Building Regulations require both domestic and nondomestic buildings to be built so that people, including disabled people, can reach the principal, or suitable alternative, entrance to a building from the point of access. For the adaptation of historic buildings however, accessibility measures are balanced against the impact upon the historical character and interest of those buildings.
22. Dwellings that are built to the Lifetime Homes standards, such as those built by a Registered Social Landlord where a Development Quality Requirements standard is required, include additional requirements to Building Regulations, for example requiring entrances to be lit and covered. This is not a national requirement at present.
23. The Authority consults with an 'Access Officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.
24. Any amendments to Planning Policy Wales or other national planning policy in response to The Expert Group on Housing an Aging Population will need to be considered by the Authority when published. The Authority would be willing to consider being part of any wider pilot initiatives.

Access to affordable housing young people and facilitation of self-build (Age)

25. The Housing Market Assessment provides overall figures for affordable housing need. At an individual planning application stage the mix of units in terms of

number of bedrooms that each affordable house has can be negotiated. Nominations come from the housing waiting list rather than the Plan specifying who occupies in terms of social housing. Private affordable housing will have occupants nominated from the housing waiting list. Local occupancy criteria are normally applied as per Technical Advice Note 2 (Planning and Affordable Housing). As planning authority a requirement to include self-build proposals is not possible although these can be pursued by landowners/developers. It is difficult to obtain mortgages for such proposals.

26. A consultation response query was received about the above response 'Is the basis for the first statement that there is uncertainty over deliverability because of the potential difficulty in securing finance?' Officer provided the following answer: "It is advising that the planning system cannot require a proposal for housing to be a self-build proposal. Mortgages are an additional issue."

Accessible housing provision (Disability)

27. A life time home standard is applicable to all social housing achieving the Development Quality Requirement (DQR) funded by WG Social Housing Grant. There is however limited provision of affordable housing under DQR in this National Park. To apply the requirement to housing development generally would require evidence of need and evidence of viability. The primary premise of the Plan is that there is no need for market housing so a justification for requiring a Lifetime Home standard on market housing is not feasible. A requirement for a Lifetime Home standard on the affordable housing element would need more information on the nature of need perhaps from the local housing market assessment. Welsh Government is also relying on individual local authorities to consider what the viability implications are for adopting the Lifetime Homes standard. Given the experience of assessing the viability of introducing sprinklers a more national than local type of assessment would be less likely to be challengeable. Part M of Building Regulations does apply the standard for 'visitable dwellings'. The Affordable Housing Group was consulted; no additional comments were received. They were also able to comment as part of the wider consultation.

Creation of Accessible Walkways and Paths (Disability)

28. The creation of walkways and paths is generally outside of the land use planning remit. Technical Advice Note 12: Design promotes key design principles such as ease of access for all, community safety and safe and clear movement routes that are fit for purpose. The authority consults with an 'Access Officer' to advise on the accessibility of proposed buildings when considering planning applications for buildings and public open spaces.

Accessible facilities in St Justinian's area (Disability and Age)

29. The consultation process highlighted concern about the lack of suitable toilet facilities and how people who are protected under the Equality Act 2010 can have appropriate and necessary facilities in the St Justinian's area.
30. Officer response in relation to toilet facilities:

31. In principle Policy 53 Community Facilities and Infrastructure Requirements supports provision of community facilities outside built up areas as long as they are suitably located.
32. The provision of improved facilities in St Justinian's area is dependent on suitable proposals coming forward and Policy 53 would apply.
33. Officer response in relation to car parking:
34. The Authority is working with Pembrokeshire County Council and the community to find a sustainable solution for access to St Justinian's and will include full consideration of accessible parking provision.

Policy 51 Gypsy Traveller and Showpeople sites – Criterion A (Race)

35. The consultation process highlighted concern about Criterion A in Policy 51. The consultation response from the Welsh Government, Plans branch notes "Policy 46 Gypsy and Travellers – As worded, Criterion A could be considered not to promote the same rights in the planning system as other citizens (Bullet 1, Annex B). The requirement to 'evidence need' would not be a restriction placed on non-Gypsy and Travellers, so would this requirement be fair and reasonable in the plan? By their very nature, Gypsy and Travellers are nomadic and will not always have local connections. On this basis, Authorities should determine all applications from anyone who submits them (Bullet 6, Annex B)."
36. Risk identified of Criteria A potentially discriminating against Gypsy, Travellers and Show People in the planning process.
37. Officer response noted that the justification for deleting criterion a) in the email clarification above actually refers to the Welsh Assembly Government not approving of a criterion that advises 'Applications from Gypsies and Travellers with no local connection will not normally be allowed.' The supporting text quite rightly refers to the fact that Gypsies and Travellers are nomadic and do not necessarily have local connections. Given this context it is still argued by this Authority that the criterion is appropriate as it does not apply this restriction. The purpose of the criterion is to ensure that proposals for Gypsies and Travellers are planned for in a co-ordinated fashion and if there is a suitable plot already available in the area then it would be better to utilise this than create a new site on an ad hoc basis where there was no justification for it. This would not prevent Gypsies and Travellers providing a justification for why they needed to be in that particular location, for example the need to have a transitory site for potato picking on the St David's peninsula.
38. Further clarification asked for from officer and provided below.

39. These types of proposals come forward in a countryside location which in planning terms requires justification of need. Housing in countryside locations similarly requires evidence of need.

40. Welsh Government has advised that it needed to seek legal advice on the issue.

41. Response from Welsh Government on 4/01/2018 noted:

“The requirement to ‘evidence need’ for new gypsy and traveller sites is an issue being considered as part of the updated circular. To my understanding, this is due to be published in the New Year.

Whilst the findings of the updated circular should be incorporated in your Deposit plan, this may not be feasible due to the timing of its release. In this case, the LDP process and examination itself will allow for any amendments to be made.”

Shadow Habitats Regulations Assessment of the Deposit Local Development Plan (Replacement) to 2031

1. Pembrokeshire Coast National Park Authority is a competent authority under the Conservation of Habitats and Species Regulations 2017¹ (“the Habitats Regulations”). In accordance with Regulation 105 of those regulations, Pembrokeshire Coast National Park Authority must make an assessment of the Local Development Plan as a matter of law before it is adopted². This assessment is generally referred to as a ‘Habitats Regulations Assessment’ (HRA) and the regulations set out a clearly defined step-wise process which must be followed.
2. A draft Habitats Regulations Assessment of the Local Development Plan (Replacement) to 2031 has been prepared by the consultancy DTA Ecology Ltd. The Habitats Regulations Assessment follows the guidance set out in The Habitats Regulations Assessment Handbook³, which is produced by DTA. Current subscribers to the Handbook include Natural Resources Wales and the Planning Inspectorate. The ‘Practical Guidance for the Assessment of Plans under the Regulations’ contained in Handbook is considered to represent best practice as it is accepted by both Natural Resources Wales and the Planning Inspectorate as appropriate for their own staff to follow.
3. The draft Habitats Regulation Assessment screens all the draft Local Development Plan policies and potential housing allocations in respect of the potential for likely significant effects upon any European site, either alone or in combination with other plans and projects.
4. Following a preliminary screening, six policies and six potential housing allocations were identified as potentially having a likely significant effect. Mitigation measures, in the form of suggested amendments to the wording of policies and/or supporting text, were identified in respect of all twelve of these Local Development Plan elements.
5. For example, the suggested amendments to the potential allocation text recognise that the requirements of the Habitats Regulations might limit or restrict the quantum of development coming forwards, and specifies that development proposals must demonstrate compliance with Local Development Plan Policy 10 (Sites and Species of European Importance).
6. Assuming the recommended mitigation measures are all accepted (proposed edits are incorporated in Appendix 1 (draft Deposit Local Development Plan (replacement) for consultation) for Members to consider, it is possible to screen out all the policies from the need for further assessment. In the consultant’s opinion, the Local Development Plan (as amended by the proposed mitigation measures) would then have no likely significant effect either alone or in combination with other plans and projects and there would be no need for a subsequent appropriate assessment under the Habitats Regulations.

¹ The Conservation of Habitats and Species Regulations 2017 SI No 1012

² Refer regulation 105

³ Tyldesley, D., and Chapman, C., (2013) *The Habitats Regulations Assessment Handbook*, November 2017 edition UK: [DTA Publications Ltd.](#)

List of Final Edits Post Local Development Plan Workshop January 2018

1. Proposals Maps prepared.
2. Constraints Map uploaded.
3. Local Development Plan workshop - Welsh language comments addressed. References to Technical Advice Note 20 clarified.
4. Local Development Plan post workshop - One Planet Development comments addressed.
5. Latest minerals position for Ceredigion County Council Local Development Plan area inserted.
6. Local Development Plan workshop - undergrounding in relation to offshore developments comment addressed.
7. Carbon sources update for introduction to the Climate Change Chapter
8. Windfall site at Dinas Cross Tower Hill excluded.
9. Local Development Plan workshop – Edits to Habitats Regulations Assessment recommended text inserts.
10. Minor amendments to Coastal Change Management policies (Natural Resources Wales comments).
11. Wiseman’s Bridge listed as a ‘split’ Centre (lies partly in Pembrokeshire Planning Authority’s jurisdiction).
12. Cross referencing to Coastal Change Management policies inserted in policies for the Centres and Countryside.
13. Reference to Seascape Character Areas and Landscape Character Areas being on the Proposals Map deleted.
14. ‘Windfall’ explanation edited.
15. ‘Allocation’ explanation edited.
16. ‘Exceptional land release for affordable housing’ explanation provided.
17. ‘Workaday’ – term explained in Glossary of Terms
18. Proof reading undertaken.

Possible Future Edits - as at **March 2018**

1. PPW (Edition 10) is out for consultation until mid-May. After this date, the published version (anticipated end of summer) could be subject to change as a result of representations received. On this basis, the advice from Welsh Government is that the Deposit plan, which is due to be published in April, must reflect the current edition of PPW i.e. Edition 9. The plan should respond to any future published versions of PPW and if necessary. WG advise that they can discuss this approach with the Authority at the time.

2. The requirement to 'evidence need' for new Gypsy and Traveller sites is an issue being considered as part of the updated circular. This has yet to be published – February 14th 2018. Advice from Welsh Government is that whilst the findings of the updated circular should be incorporated in the Deposit plan, this may not be feasible due to the timing of its release. In this case, the Local Development Plan process and examination itself will allow for any amendments to be made.
3. See also Evidence Base Background Paper for other areas of potential change.¹

¹ [Pembrokeshire Coast National Park - Papers A-F](#)