

<p>HS1/AP6 – PCNPA to expand the Spatial Strategy section to explain: the overarching strategy, its key components, how the key components of the strategy align with the WSP, and why it remains the most appropriate strategy for the National Park; and to consideration needs to be given to the need for a Growth Policy which explains the scale of, and context for new development in the NPA and a Spatial Strategy Policy which explains the distribution of development and settlement hierarchy. It is noted that the provision of a new Growth Policy may result in changes to Policy 8.</p>	<p>16th August 2019</p>	<p>MD</p>
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The following amendments will be made to the Plan:

Para 4.1 is to be retained; paras 4.2 to 4.10 will be deleted and the following inserted:

‘The over-arching strategy of the Plan seek to address the six priority issues identified in Chapter 2 and set out a policy framework to achieve the land use aspects of the vision and the objectives for the area as set out in Chapter 3. Outlined below is a list of the six priority areas and the strategy and policy responses that are necessary to address these issues.

<p><i>Priority Areas and Strategy and Policy Response</i></p>
<p><i>Priority A - Special qualities</i></p>
<p><i>The strategy and key policies will:</i></p> <ul style="list-style-type: none"> • <i>ensure that the special qualities of the Plan are conserved and enhanced. (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)</i> • <i>provide a framework for protecting those characteristics and features of the National Park which individually or in combination contribute to make this National Park unique.</i>
<p><i>Priority B - Major development, the potential for growth</i></p>
<p><i>The strategy and key policies will:</i></p> <ul style="list-style-type: none"> • <i>only allow major development, as defined in national planning policy, including minerals development in exceptional circumstances.</i> • <i>allow Waste facilities where they, predominantly, serve the National Park area.</i> • <i>other policy areas such as housing and employment are addressed elsewhere in this table.</i>
<p><i>Priority C - Climate change, sustainable design, renewable energy, flooding</i></p>
<p><i>The strategy and key policies will:</i></p> <ul style="list-style-type: none"> • <i>ensure that at the end of the Local Development Plan period new development will be more sustainable in design.</i> • <i>support the provision of individual and community based renewable energy projects</i>

- *in planning for the future changes in climate, ensure no new development takes place in locations where there is a long-term strategy to allow the sea or river to inundate or flood.*
- *recognise 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. This is particularly important for this coastal National Park under direct threat from sea level rise and climate change.*
- *acknowledges the life-span of buildings beyond multiple generations of people and seeks to reduce overall risk to individuals, communities, business and the environment.*
- *Promote development in locations which supports sustainable transport.*

Priority D: Visitor economy, employment and rural diversification

The strategy and key policies will:

- *Seek 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.*
- *ensure that 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.*
- *permit some additional caravan and camping is permitted and visitor attractions.*
- *allow 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.*

Priority E: Affordable housing and housing growth: How to tackle affordable housing need in the Park.

The strategy and key policies will:

- *provide for market housing to help deliver affordable housing. There is a significant need for affordable housing in the National Park and affordable housing need exceeds that which the market housing can provide.*
- *Provide a framework for market housing to cross subsidise the provision of affordable housing will assist in meeting the need. The key determinants for what can be provided have been the: distribution of housing development in accordance of with the Plan's spatial strategy; the deliverability of sites; and the National Park's landscape capacity to absorb additional housing development.*
- *prioritise the delivery of affordable housing over other land uses in certain instances.*
- *support the development of affordable housing on rural exceptions site.*

Priority F: Community Facilities & Retail

The strategy and key policies will:

- *ensure that Tenby, Saundersfoot, St Davids and Newport maintain their position in the retail hierarchy 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.

- *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.*
- *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 infrastructure 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.*

The policy framework provided in the remainder of the Plan is grouped under the National Park's six priority issues. Strategy policies are identified by the suffix 'Strategy Policy' and coloured with a yellow background. Supporting policies are coloured with a blue background.'

Para 4.11 – 4.13 and Policy 1 are retained as submitted. Paras 4.14 – 4.24 (inc) deleted; and the following inserted after para 4.13 and before 4.25:

'The Plan's Strategy

The strategy for Replacement LDP builds on the strategy for the previous LDP which provided a 'rural strategy' which sought to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park whilst having regard to the need to foster the economic and social wellbeing of the communities. The Replacement Plan strategy is supported by the findings of the Sustainability Appraisal; and is compatible with the Wales Spatial Plan and neighbouring plans. Whilst the Wales Spatial Strategy remains an important consideration, it is clear that the needs/requirements of the National Park have evolved and, as a consequence, the strategy in Replacement LDP has evolved and needs to explain how these changes will be addressed over the new plan period. The over-arching strategy of the replacement Plan will therefore combine the need for environmental protection with a balanced and sustainable approach to the delivery and distribution of new development.

An essential element is the strategy is to ensure that the special qualities of the Plan area are conserved and enhanced. This relates particularly to the Park's: coastal splendour; richness of habitats and biodiversity; diverse geology; Islands; diversity of landscape; accessibility; distinctive settlement character; space to breathe; the rich historic environment; remoteness, tranquillity and wildness; cultural heritage; diversity of experiences; and the combination of individual qualities. The combination of Policies 1 and 8, along with the supporting policies, provides the framework for protecting those characteristics and features of the Park which individually or in combination contribute to make this National Park unique. In addition, the Plan's strategy recognises the importance of seeking to manage and mitigate the effects of climate change in the National Park through: promoting sustainable design; reducing the need to travel Policy ; supporting individual and community based renewable and low carbon energy projects;

restricting new development will be encouraged in locations where there is a long-term strategy to allow the sea or river to inundate or flood.

The growth element of the Plan's Strategy is based on an assessment of a number of factors including: evidence of need, key issues and considerations, the national, regional and local policy context. The evidence on needs within the Park informs a strategy that will, in order to enable the delivery of affordable housing, be market housing led. The Plan will provide for dwelling requirement figure of 960 which, subject to viability, would result in the provision of 362 new affordable homes. The provision of affordable housing will be supported by policies which prioritised provision in the reuse of redundant community / employment buildings and agricultural buildings and through the development of rural exceptions sites.

To enhance the economic well-being of the National Park the strategy will provide a policy framework which supports the visitor economy and the employment sector. The policy approach for the visitor economy will be to attract an optimal number of tourists all year round while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance. This will be achieved by carefully managing the provision of new and existing tourism accommodation and facilities in the Park. In terms of employment, the Plan makes no specific allocation for the provision of new land for class B1, B2 or B8 use but provides a framework which seeks to manage existing employment uses and allows for the provision of new small-scale provision. This approach will assist in meeting need and enhance the socio-economic well-being of Park communities.

The growth strategy will seek to ensure that Tenby, Saundersfoot, St Davids and Newport maintain their position relative to one another and larger centres outside the area. To achieve this provision will be made for 1270 sq. meters of new retail floorspace which will be delivered through the reuse of existing retail units and support given for 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.

Major development such as minerals extraction and waste facilities will only be permitted in the Park in exceptional circumstances or, in the case of waste management, where it can be demonstrated that they will, predominantly serve the needs of the National Park's communities.

Having identified the main development needs of the area over the Plan period, the will, through the spatial element of the strategy, guide and distribute development to sustainable locations whilst conserving and enhancing the special qualities of the National Park. The settlement hierarchy is based on that contained in the Wales Spatial Plan and has been adjusted to take account of local circumstances:

The Plan's settlement hierarchy comprises:

Tier 1 – Local Service and Tourism Centres, which provides services to the wider hinterland and services an employment and tourism function;

Tier 2 – Local Centres, are principally local centres with some being significant tourism centres;

Tier 3 – Rural Centres, include many of the smaller settlements in the plan area and offer only limited opportunities for growth and

Tier 4 – The Countryside, where development will be strictly controlled.

New housing provision is focussed in the higher tiers particularly in terms of allocations. Centre boundaries are used to define the extent of the developable area of settlements, the exception to this is where policies specify where edge of Centre sites are acceptable in principle and where the dispersed pattern of identified Centres has rendered it impractical to define a boundary.

The key diagram illustrates the LDP strategy and shows the spatial relationship between Tier 1, 2 and 3 Centres, the main transportation network and authorities adjoining the National Park.

Key Diagram inserted'

Insert the following text before paragraph 1.7

The Wales Spatial Plan Update – People, Places, Futures, 2008. This splits Wales into six sub-regions with the Pembrokeshire Coast National Park located within the Pembrokeshire – The Haven area. Its vision for the Pembrokeshire – The Haven area, ‘A network of strong communities supported by a robust, sustainable, diverse high value-adding economy underpinned by the Area’s unique environment, maritime access and internationally important energy and tourism opportunities’

The Spatial Plan outlines a number of key priorities for the Pembrokeshire – The Haven including, in summary, the needs to:

- *overcome the Area’s peripherality by improving strategic transport links and economic infrastructure;*
- *develop a more diverse, entrepreneurial knowledge-based economy; increase higher value-adding economic activities, particularly in the rural economy, by developing an all year, high quality tourism and leisure sector;*
- *develop the Area’s three strategic hubs (Haverford West, Milford Haven and Neyland and Pembroke and Pembroke Dock) which are seen as critical to this is the renewal of town centres, the development of complementary settlement roles within and between hubs, strengthening community, economic and social outreach and spreading benefit and growth to the wider hinterlands and smaller rural communities;*
- *raise skill levels through effective partnership working and tailoring learning;*
- *sustain and strengthening communities by taking focused action to address both rural and urban deprivation and economic inactivity and to ensure housing provision appropriate to all; and*
- *protect and enhance the Area’s important environmental assets, maximising their potential through exemplary sustainable development.*

In terms of the Pembrokeshire Coast National Park, the Spatial Plan sees the designation as a key asset, not only in terms of tourism, but more generally as a key element in its attractiveness as a place in which people will choose to live and work. But

recognises that the impacts of tourism and Key issues such as meeting demand for affordable housing, the need to protect environmental assets from damage and the demand placed on local services by tourist numbers in the high season need to be addressed.

Amend Policy 21 by the deletion of criteria b, c, f and g.