
Pembrokeshire Coast National Park

**Management Plan (2014-2019)
Local Development Plan 2
(2015-2031)**

Background Paper: Employment

March 2018

PEMBROKESHIRE COAST NATIONAL PARK AUTHORITY

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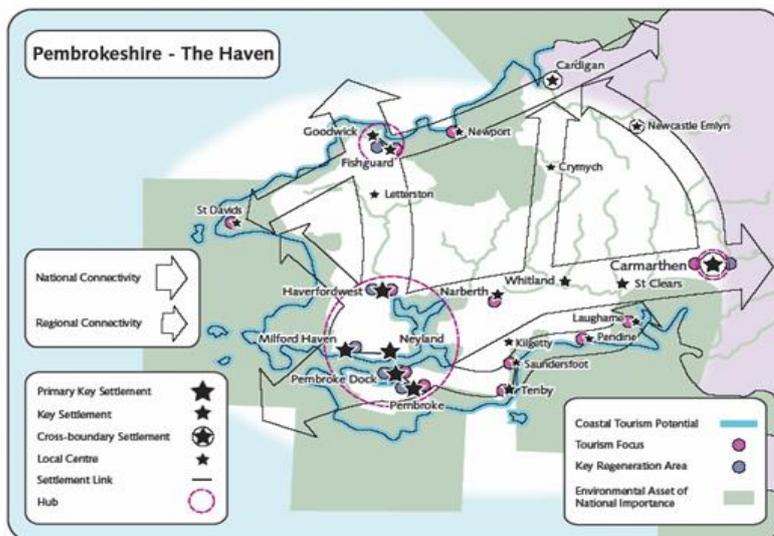
National, Regional and Local

National

Wales Spatial Plan (2008 Update)

1. The Wales Spatial Plan encompasses the elements required to deliver sustainable development: services, land use and investment. It is a framework for developing national and regional perspectives. It contributes to better public services in a number of ways, including the shaping of policy.
2. As a general principle, employment-related property development should be located near public transport and close to housing and infrastructure developments.

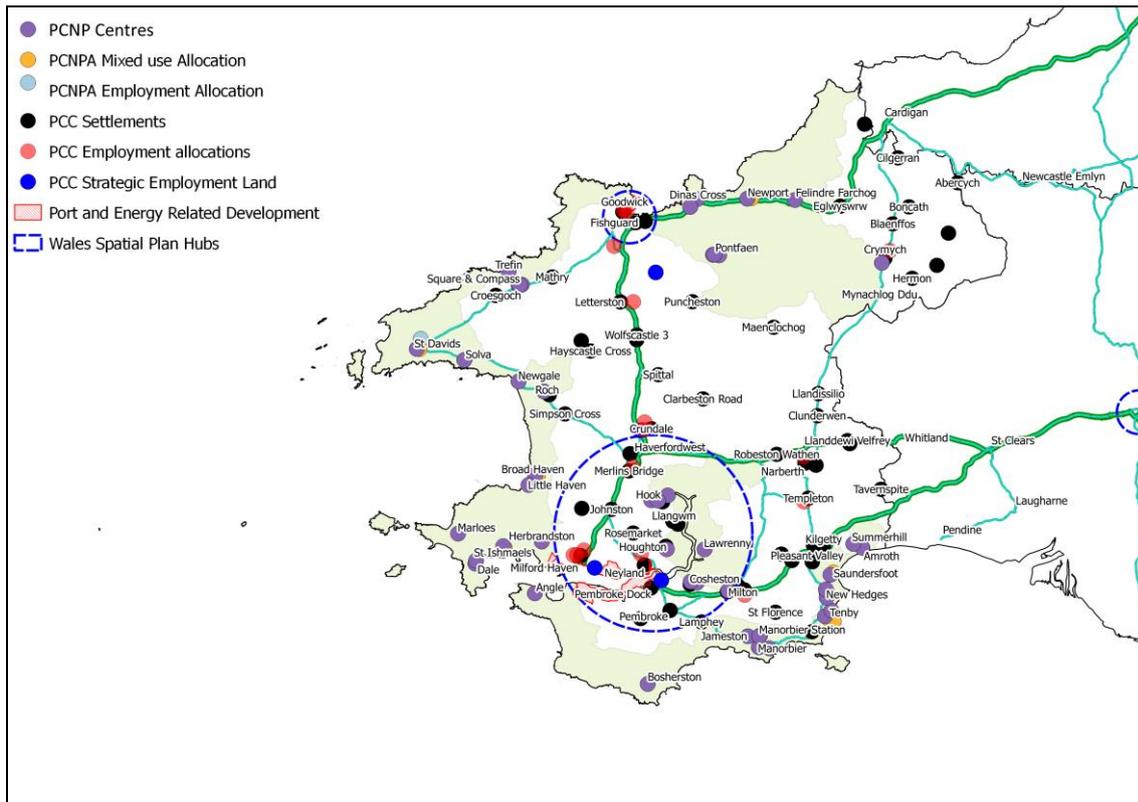
Map 1 Extract from the Wales Spatial Plan



3. **There are three strategic hubs – shown in Pink** concentrating future investment on the Area's three strategic hubs, linkages to these settlements, and the diverse pattern of even small rural centres that sit below them, are strengthened and improved so that the benefit of the investment is truly felt by, and spread to, the wider hinterlands.
4. **Promoting a Sustainable Economy:** Strategic employment sites will be key investment and employment locations. A range of good quality affordable sites and premises needs to be available to promote the development of **small and medium size businesses**, with the appropriate infrastructure, particularly communications and information technology.

5. Larger **strategic sites** may be needed to maximise the strategic potential of the Milford Haven Waterway, and sites with such potential need to be identified and reserved for such Waterway-linked uses.
6. A priority is to develop an **energy strategy** for Pembrokeshire – The Haven, to provide a platform to establish opportunities for employment, skills and the environment arising from the energy sector, and in particular to make the Area a centre for innovation in the energy and environmental goods sectors, **including low-carbon and renewable energy**.
7. **Tourism and leisure** are already a big part of the Area's economy but have the potential to be developed further, including through the implementation of the Tourism Opportunities Action Plan. The Area should be a premier **all year round destination**, with the **emphasis on high quality provision at all levels, supporting well-paid jobs. Reinforcing the Area's distinctive character**, allied to **outdoor activities**, marine leisure, recreation and interest in the Area's wildlife, archaeology, history and culture, is central to offering visitors something really special.
8. The development of tourism enterprises situated within the former **Tenby tourism growth area** and along the coastal corridor reaching to Laugharne in western Carmarthenshire is particularly important for the Area's tourism offering.
9. Map 2 below, Appendix 1 and Appendix 2 illustrates this strategy in spatial and practical terms as set out in the County Council and the National Park Authority's existing Local Development Plans. The Plans' provide for employment allocations. These are predominantly located in the Council's jurisdiction where strategic sites are identified in particular on the haven waterway, providing opportunities for employment growth close to the main centres of population. Employment allocations in the National Park authority's jurisdiction have not been delivered and the intention through review is to respond to uncertainty by considering a more flexible approach through a criteria based policy approach. This is complemented by additional policies for range of employment related uses – See Appendix 2.

Map 2: Employment Strategy Pembrokeshire and Pembrokeshire Coast National Park Local Development Plans



Valuing Our Environment: A Study of the Three Welsh National Parks (Welsh Government et al; October 2006)

10. The environment of the Pembrokeshire Coast National Park:

- a) Generates a total of £68 million in income;
- b) Supports 4,653 jobs;
- c) Contributes £81 million to the GDP of Wales

11. The Pembrokeshire Coast National Park has a huge economic impact outside its boundary because it is mainly a coastal ribbon. Nearly all the indirect employment and indirect income generated by the Park environment benefits the rest of the Welsh economy. Employment is strongly tourism-based.

- a) Total direct employment relating to the environment of the Pembrokeshire Coast National Park amounts to 3,762 jobs.
- b) Indirect employment is 892.
- c) 93% of indirect employment occurs outside the National Park.
- d) Direct income from the Park is £51.41 million.
- e) Indirect income is a further £16.97 million.
- f) 95% of indirect income occurs outside the Park

Table 1 Rank of 10 largest sectors according to employment rates in the Pembrokeshire Coast National Park (Largest = 1)

Rank	
1	Hotels, bars and restaurants
2	Education
3	Retail
4	Recreation, culture and welfare
5	Construction
6	Agriculture and fishing
7	Health
8	Oil processing
9	Wholesale
10	Other land transport

Valuing Wales' National Parks (November 2013) - Arup (on behalf of The Welsh National Park Authorities, Natural Resources Wales and the Welsh Local Government Association

12. Overall, the National Park economies account for £557m of GVA, representing 1.2% of the Welsh economy. The Parks receive 12 million visitors each year spending an estimated £1bn on goods and services which greatly exceeds turnover for businesses within the National Parks.

13. Pembrokeshire Coast National Park:

- a) Covers a land area of 621km²
- b) Has a coastline of over 400km
- c) Has a population of 21,870
- d) Is visited by 4.2 million people each year

14. The shape of the National Park around the coast means that its relationship with the rest of Pembrokeshire is particularly important, in terms of its economy and impact.

- Pembrokeshire Coast NP Indirect employment stands at 529
- Pembrokeshire Coast NP Direct Employment stands at 3,004

Table 2: Employment in the Environmental Sector within Pembrokeshire Coast National Park

Employment Sector	Pembrokeshire Coast National Park
Agriculture, forestry, fishing and mining	1,018
Electricity	77
Retail Trade	474
Accommodation and travel agents	831
Restaurants and bars	619
Recreation and culture	238
Water, sewerage and waste	22
Land transport	47
Public administration and defence	206
Total	3,532

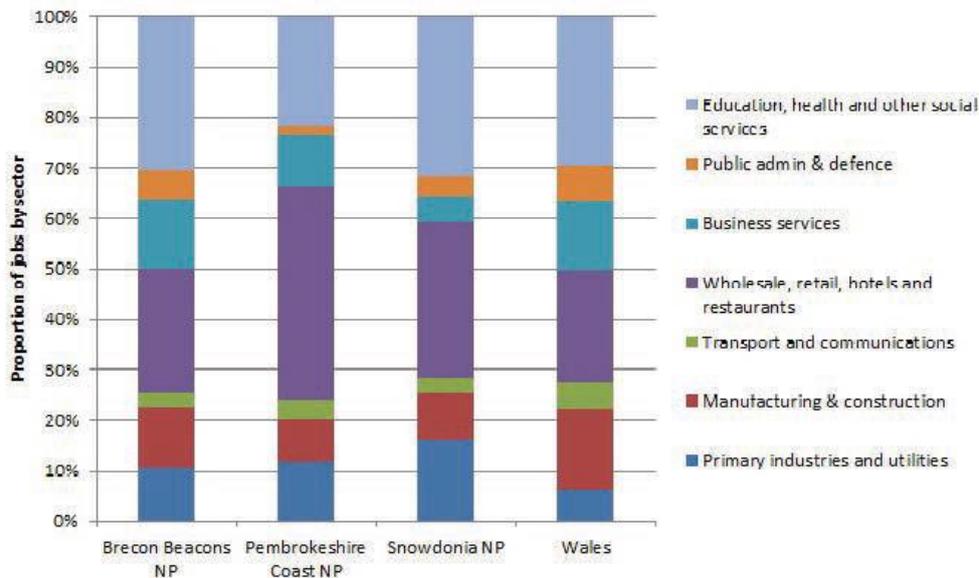
Table 3: Economic Activity in Wales' National Parks, 2012

	Pembrokeshire Coast National Park
Population	21,870
Business Units	1,390
Employment	7,039
Gross Value Added	£187m

Source : ONS

15. The three Welsh National Parks are a significant part of the Welsh Economy, directly accounting for £557m of GVA (1.2%) even before the wider contribution of the tourism sector are taken into account.
16. The environment underpins much of the economy in the National Parks. Sectors and businesses dependent on the environment account for 38% of employment within the National Park boundaries compared with 17% for Wales as a whole.
17. The size of the economy dependent on the quality of the environment greatly exceeds the scale and cost of activity related to environmental protection and enhancement.

Table 4: Job Sector Comparison Source: Valuing Wales' National Parks (September 2013)



18. The nature of employment in National Parks tend to be more rural business, with sectors linked to tourism being prominent (Pembrokeshire Coast National Park's contribution is significant). The economy is diverse with significant self-employment including lifestyle businesses.

Economic Renewal: A new direction - Welsh Assembly Government (July 2010)

19. To remain competitive Welsh businesses must be able to invest in new development in an efficient and timely way. National and local government and public sector agencies have a key role to play by providing the best possible framework for pursuing sustainable development. Economic Renewal policy will see a fundamental shift away from direct and generic support for companies to a focus on creating the right environment for businesses to succeed. The planning system must balance economic, social and environmental objectives and, in doing so, promote sustainable development.

20. The interface between the planning regime and economic development is critical and the Welsh Government is committed to strengthening this. Welsh Government advises it will ensure that economic development planning policy is aligned with its new direction for economic renewal by **making available resources** from DE&T to support the work of Welsh Government's Planning Division.

Planning Policy Wales Edition 9 Welsh Government (November 2016)

21. It is essential that the planning system considers, and makes provision for, the needs of the entire economy and not just those uses defined under parts B1-B8 of the Town and Country Planning Use Classes Order. (Para 7.1.2)

22. The planning system should support economic and employment growth alongside social and environmental considerations within the context of sustainable development. The planning system should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses. (Para 7.1.3)
23. In applying locational, environmental and sustainability considerations, local planning authorities should aim to steer economic development to the most appropriate locations, rather than prevent or discourage such development. (Para 7.1.4)
24. Plans and decisions should also be based on up-to-date and locally-specific evidence which demonstrates the suitability of the existing employment land supply in relation to the locational and development requirements of business. As part of the process of establishing a local evidence base, local planning authorities should undertake and keep under review, an Employment Land Review which is relevant to prevailing market conditions and the requirements of the development plan. Further guidance on the preparation of Employment Land Reviews is provided by a new good practice guide (Building an Economic Development Evidence Base to Support a Local Development Plan, August 2015) which explains how to gather the necessary evidence for development plan preparation. These will be prepared on a 'local' and 'larger than local' basis.
25. Local authorities should encourage the growth of self-employment and micro businesses in rural areas by adopting a supportive and flexible approach to home working. (Para 7.3.1)
26. While some employment in rural areas can re-use existing buildings, new development will be required in many areas. Such sites should be small and generally located within or adjacent to defined settlement boundaries, preferably where public transport provision is established. Certain industries may have specific requirements. (Para 7.3.2)
27. Local Planning Authorities should adopt a positive approach to development associated with farm diversification, irrespective of whether farms are served by public transport. (Para 7.3.3)
28. Development plans should:
 - a. reflect work with neighbouring authorities and other relevant stakeholders to plan strategically for employment land provision;
 - b. be underpinned by an up to date and appropriate evidence base to support policy choices and land allocations for economic development;
 - c. using this evidence base, as far as is practicable set out an economic vision for the area, including a broad assessment of anticipated employment change by broad sector and land use;

- d. provide targets on land provision for the employment uses (Classes B1-B8), showing net change in land/floorspace for offices and industry/warehousing separately, and protect these sites from inappropriate development;
- e. include policies relating to future development on existing employment sites to protect them from inappropriate development:
 - i. to encourage the regeneration and re-use of sites which are still suitable and needed for employment;
 - ii. to control and manage the release of unwanted employment sites to other uses;
- f. seek to provide the right amount of land and qualitative mix of sites to meet the market demand for economic development uses;
- g. propose specific locations for those necessary industries which are detrimental to amenity and may be a source of pollution;
- h. seek to promote and facilitate development that will deliver physical regeneration;
- i. in safeguarding existing sites and providing new sites, prioritise sites that deliver appropriate job and training opportunities to disadvantaged communities;
- j. concentrate development that attracts large numbers of people, including retail and offices, in city, town and village centres;
- k. include criteria-based policies to deal with development not specifically allocated in the development plan and help respond to unexpected change;
- l. include policies on the scope for new economic development in and adjoining rural settlements and identify suitable sites. In remote rural areas and smaller settlements a criteria based approach should be considered;
- m. include policies encouraging farm diversification and new rural development opportunities;
- n. identify protection zones around establishments that hold hazardous substances and protect the ability of existing establishments to operate or expand by preventing the incremental development of vulnerable uses in the vicinity of such sites. (Para 7.5.1)

Technical Advice Note (TAN) 23 - Economic Development - Welsh Government (February 2014)

29. Market forces do not respect local authority boundaries and the planning system should steer development to the most efficient and

sustainable locations. This means that strategic planning, larger than individual local planning authorities, for economic development is essential. (Para 1.3.1)

30. Local planning authorities are encouraged, therefore, to work jointly in regional groups, which ideally already exist, to prepare regional economy evidence bases, including an analysis of the dynamics of the regional commercial and industrial property market, followed by an economic strategy. These strategies should:
 - a) Include a modelling of future economic scenarios;
 - b) Identify strategic sites of national and regional importance;
 - c) Provide agreed land provision targets for the B-class uses showing how development is to be distributed across local authority areas in Local Development Plans. (Para 1.3.2)
31. Where a planning authority is considering a site allocation or planning application that could cause harm to the environment or social cohesion, there are 3 questions to ask:
 1. Is there an alternative site?
 2. How many jobs would be created?
 3. Would the development make any special contribution to policy objectives?
32. In rural areas local planning authorities should use a sequential approach when identifying land for economic uses in development plans. (Para 3.1.2)
33. There are two kinds of special contribution that are particularly relevant to rural development. Firstly an economic development could make communities more sustainable by improving the alignment of housing and jobs. Secondly the needs of established businesses or clusters may be very specific. When businesses expand or modernise they may need to do so in situ. (Para 3.1.3)
34. Planning authorities should use these criteria comparatively. They should assess the additional benefits of development at the subject site against those of meeting demand in a sequentially preferable location. (Para 3.1.4)
35. Development plans should include criteria-based policies to assess applications for proposed developments on land not allocated in the Plan. (Para 3.1.5)
36. The TAN provides advice on who should be consulted when preparing the Local Development Plans.
37. Because economic issues are generally larger than a local authority level, evidence is most appropriately collected at both a regional and local scale. (Para 4.2.1)
38. This should include:
 - a) A broad overview of the whole economy

- b) Strategic sites for B class uses;
 - c) The LPA's position in the region and nationally
 - d) High level data on non-B class uses in other employment categories
 - e) An Employment Land Review (can be prepared in collaboration with other authorities).
39. A broad vision must be developed consistent and coherent so that the economic, social and environmental considerations support each other and point in the same direction.
40. An economic vision is a part of the Local Development Plan vision; it is not separate to it. It should also be consistent with the aims of other local authority strategies such as the Community Strategy and Single Integrated Plan. (Para 4.3.1)
41. The economic vision needs to reflect future uncertainties, and explicitly acknowledge key uncertainties, with development plans putting in place mechanisms which will provide the flexibility to adjust to changing circumstances. (Para 4.3.2)
42. In areas where there is an up-to-date economic development strategy, the development plan's vision and the economic development strategy should be integrated into the plan making process to ensure that all other provisions within the plan such as transport and housing are geared towards delivery of the strategy, whilst providing the flexibility necessary to adjust to evolving circumstances. Some areas will not have up-to-date economic development strategies because local authorities are no longer required to produce them. In those cases, the vision in the development plan could do much of the work that the economic development strategy used to. (Para 4.3.4)
43. In developing their economic visions, local planning authorities should assess current and future business requirements, considering potential new inward investment opportunities and new start-ups as well as established local firms. They should search for opportunities to create better and more competitive business locations, responding to business requirements and filling any gaps in supply. (Para 4.3.5)
44. Local Development Plan employment land targets should aim to ensure that planning meets the demand for land, so that economic growth is not constrained by lack of land. However, demand does not have to be met in the local planning authority area in which it arises. Much of the demand for employment land is footloose across administrative boundaries. Authorities should work together to steer development to the locations which are the most sustainable and efficient (both when allocating sites for the Local Development Plan and when dealing with proposals for development). (Para 4.5.1)

Practice Guidance - Building an Economic Development Evidence Base to Support a Local Development Plan: Welsh Government (August 2015)

45. The practice guide provides step by step advice on how to build an evidence base to support LDP employment land strategies and policies. The guide aims to address common technical problems and achieve greater consistency of approach to collecting data across Wales but is not a rigid model or the only method for achieving the requirements in Planning Policy Wales.
46. The practice guide is concerned with the collection of economic development data at two levels, larger than local (and area greater than a single authority) and local. The two studies should ideally be conducted in parallel.
47. Information which forms the evidence base from these studies will need to be continually monitored and collected over the lifetime of the development plan.
48. It is recognised that some local planning authorities will first use this guide when they have already adopted their Local Development Plan. The guide can be applied to the beginning of a Plan's life or during a Review cycle. However in any review situation the extent to which new economic development evidence needs to be collected will depend on prevailing conditions and changes that have taken place since the last evidence was collected. (Para 1.4.2)
49. The Economic Vision should not be considered as the final task in the employment land review process. The vision should be drafted in the early stages of evidence gathering and, as information is collected over the study period, become more refined to reflect the evidence rather than it being purely aspirational in nature.
50. How Local Planning Authorities choose to organise and implement their larger than local and local studies is for them to decide, but typically these will be separate studies. The relationship between the two should however be a two-way flow of information

Superfast Cymru - Next Generation Broadband

51. The Welsh Government is working in partnership with British Telecom to deliver high speed broadband to 95% of homes and businesses in Wales by 2016. Work to deliver the project to Pembrokeshire commenced in 2014 and is anticipated to be completed by 2016. Once complete it is estimated that 95% of properties in the County will have access of broadband speeds in excess of 24 megabytes per second. It is not possible to identify those areas which will not be accessible until the work has been completed. It is highly likely that they will be individual or sparse properties in remote locations.

52. The National Park Authority has co-operated with the network providers to ensure that the project continues to roll out Superfast Broadband. Policy 55 on Telecommunications provides the policy context for considering telecommunications proposals. No change is needed to the Plan to accommodate this project.

Regional

Swansea Bay City Region

53. In July 2013 the Welsh Government officially launched the Swansea Bay City region which is designed to create jobs, boost prosperity and encourage inward investment. There is no hard and fast definition of the City Region but encompasses the Local Authority areas of Pembrokeshire, Carmarthenshire, City and County of Swansea and Neath Port-Talbot.

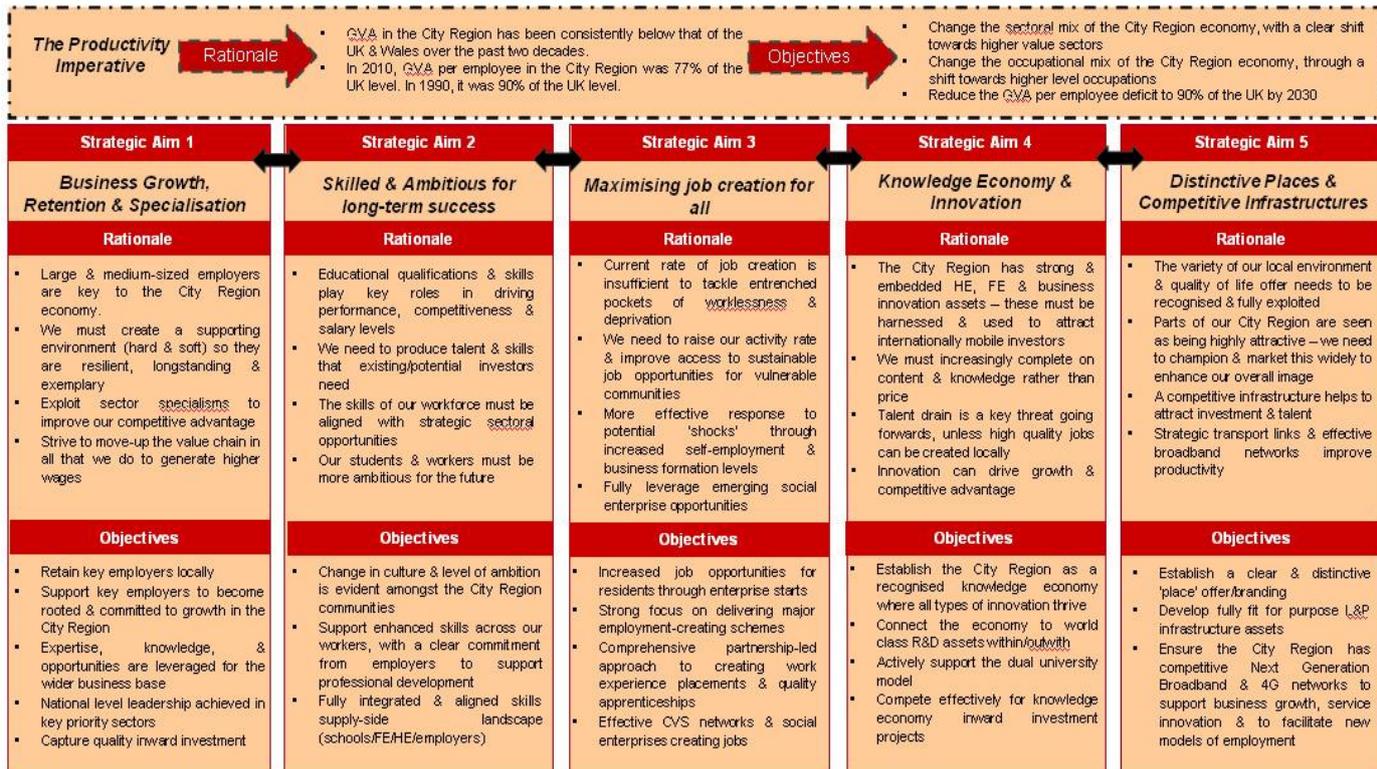
54. City Regions offer:

- larger and more efficient labour markets and therefore better prospects for job creation;
- Scope for better planning of housing, transport, support for business and other services beyond administrative boundaries;
- Better prospects for attracting investment, innovation and value-added economic activity.

55. An **Economic Regeneration Strategy** has been published (2013 – 2030). It is a framework designed to support South West Wales and the City Region's development over the next 2 decades. It is described as an unambiguous strategy for economic success, designed to accelerate growth to bring the region in line with the rest of the UK in wealth creation terms.

56. The Framework comprises 5 complementary Strategic Aims and 4 Cross-Cutting Themes

By 2030, South West Wales will be a confident, ambitious & connected City Region, recognised internationally for its emerging Knowledge and Innovation economy



Cross-Cutting Theme 1: Thinking & Delivering Together for Regional Success

Cross-Cutting Theme 2: Quality & Intelligence-driven Leadership & Action

Cross-Cutting Theme 3: Being, & Acting, Connected

Cross-Cutting Theme 4: Understanding Sustainable Growth

57. Whilst the land use planning system will be an integral element of the whole strategy, of particular relevance is strategic aim 5 to create distinctive places and competitive infrastructures. The strategy recognizes the Region as a highly distinctive and attractive place. Strategic transport links to the rest of Wales and wider UK are stated as a current short-coming. Accompanying the need to update the transport systems is:

“a dynamic commercial land and property market..” to allow “growing businesses to be able to find suitable accommodation that fully meets their requirements. Similarly staff will want access to a wide choice of thriving neighbourhoods and good quality housing....and safe and attractive public spaces including parks and green spaces, a mix of local shops, leisure amenities and cultural assets across vibrant town centres....”

58. The strategy for Swansea Bay seeks continued development of strategic employment sites with effort in this area focused initially on the Haven Waterway Enterprise Zone. In addition it seeks the co-ordinated release of additional development land to accommodate new employers and to provide grow-on space for existing firms. Alongside this is the development and enhancement of the Region's housing stock.

59. The strategy also recognizes the important environmental dimension with the strategy not calling for quick fixes. It must be recognized that it is necessary to protect and enhance the substantial environmental assets.
60. The Local Development Plan strategy is to make small-scale provision for employment in the National Park. Larger allocations are located within Pembrokeshire County Council's planning area. This is complemented by a series of criteria based policies – see Wales Spatial Plan commentary earlier and Appendix 1 and 2.
61. The Authority is working with Pembrokeshire County Council to prepare an employment land review. This will further inform the Review, if completed in time – or else will be taken into account in future reviews. Housing land allocations are made in the Plan in identified Centres throughout the National Park.

Local

Pembrokeshire County Council Economic Development Strategy and Action Plan 2017- 2022

62. The Strategy which was approved by Cabinet in October 2016 sets out actions under each of its six strategic objectives and themes showing partner involvement and resources. Potential land use related actions are:
- Improve the provision of premises for inward investors, their quality of environment. (page 36)
 - Improving mobile reception while protecting the environment. (page 43)
 - Ensure underused sites are brought back into use around the Have Waterway. Maintain register (page 46)
 - 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 Fishguard and north Pembrokeshire. (page 46)
 - Enhance tourism facilities at Milford Haven, Saundersfoot, Llysyfran, Fishguard. Enhance town centres and provide for a range of accommodation. (page 46)
 - Ensure that there is an adequate supply of units to permit rural diversification in rural areas including live work units. (page 46)

Pembrokeshire Single Integrated Plan 2013-2018 (Pembrokeshire County Council)

63. Pembrokeshire's economy reflects its peripheral geography, which is both an opportunity and a barrier. The County benefits from an outstanding natural environment, comparatively low unemployment rates, comparatively high employment rates (especially self-employment) and good deep water access for shipping, which has attracted the developments in the energy sector. (Para 4.1.3)
64. Much of Pembrokeshire's success in recent years has been developments in the energy sector. There are likely to be further developments in this sector over the next 10 years, including combined heat and powered generation, wind, wave and tidal development. There is a current proposal for a combines heat and power plant at the South Hook LNG site. [In January 2015 it was announced that this proposal has currently been shelved due to the prevailing economic conditions]. The energy sector has invested £3bn in Pembrokeshire, and the sector employs around 2500 jobs. (Para 4.1.4)
65. To develop the Pembrokeshire economy, we will focus on helping people achieve the learning, skills and confidence to improve their employment prospects.
66. In June, 2007, unemployment had fallen to 1.3% in Pembrokeshire, but has since increased to 3.6% in January 2013. Youth employment currently stands at 8.1%.
- a) Pembrokeshire relies upon small and medium sized enterprises to drive its economy.
 - b) Pembrokeshire has over 12,375 registered businesses. Of these, 11,650 or 94.1% employ less than 10 people. Of the workforce, 12% are self-employed.
 - c) The agricultural, food and tourism sectors are significant employers in the County and have concentrated local supply chains. Tourism alone provides approximately 14,180 full time jobs directly.
67. As Pembrokeshire is a rural county, we need to continue maintaining and enhancing the necessary communication infrastructure and capacity which enables people to access local services. In doing so, we will also support the long term vibrancy of our communities by creating local employment opportunities. Transport is a particularly important issue for people and our challenge is to try and reduce reliance on single occupancy car travel. (Para 5.2.3)

Rural Development Plan 2014 - 2020

68. This supersedes the 2007-2013 Rural Development Plan which is now closed. The 2014 – 2020 Plan has recently been approved by the European Commission. European Union investment of nearly £2 billion is available to wales for this period which will support economic growth and jobs through research and innovation,

business finance, ICT and Transport connectivity, energy and helping people into work and training.

69. An Economic Prioritisation Framework was published in June 2015 to set out potential 'backbone' or core activity to be funded through EU programmes. It is set out in terms of:

- Business Support
- Individual Support
- Knowledge Infrastructure
- Physical infrastructure

70. Of these of relevance to land-use planning is the 'Physical Infrastructure' category which lists:

- Sustainable connectivity to and between the City Regions and their hinterlands;
- Address-targeted pinch points in East-West TEN-T routes;
- Completion of ICT networks;
- Exploitation of 4G rollout;
- Targeted integrated investments in limited number of strategic sites (including Enterprise Zones);
- Support for the establishments of small scale community energy schemes;
- Targeted investments improving energy efficiency in housing.

71. The West Wales and the Valleys programmes comprise funding from two separate European Structural Funds: the European Regional Development Fund (ERDF) and the European Social Fund (ESF).

72. ERDF funds will help progress the region's transformation into a sustainable and competitive economy by investing in research and innovation and helping new and existing businesses to grow. It will also focus on renewable energy and energy efficiency, and strategic infrastructure. The ESF will be used to tackle economic inactivity, and increase skills and employment.

Teifi Valley Local Growth Zone

73. A task and finish group was set up by the Welsh Government in July 2013 to consider the potential for a Local Growth Zone (LGZ) in the Teifi Valley. The area is defined on a number of wards and settlements across the local authority areas of Ceredigion, Carmarthenshire and Pembrokeshire. In Pembrokeshire this includes the wards of St Dogmaels part of which is within the National Park.

74. The purpose of the group was to consider policy options to encourage and support jobs, economic growth and offer the opportunity of testing different types of interventions which are sensitive to the Teifi Valley's local economic circumstances, growth challenges and prominent use of the Welsh language.

75. The group met on 8 occasions and reported back to the Welsh Government with 26 recommendations. (<http://gov.wales/topics/businessandconomy/policy/teifi/?lang=en>).

Of particular relevance here is recommendation 23:

76. The Group is of the view that the planning process should encourage and enable economic growth in the area rather than be a constraint to it. It is recommended that:

- a) The planning policies in the LGZ should be reviewed via the Annual Monitoring Review Report with a view to ensuring that it is aligned with the other proposals in this report. If necessary, a different approach should be introduced in the LGZ which is as business and growth 'friendly' as possible.
- b) Consideration should be given to the potential for a 'Local Development Order' that simplifies the planning process for certain types of developments within the LGZ.
- c) The impact of the Local Development Plan policies in terms of housing development in the Teifi Valley should be monitored and reviewed on an ongoing basis.

77. The impact of any differentiation which might arise if there are different approaches adopted by three local planning authorities should also be considered with a view to ensuring that there is a consistent approach within the LGZ.

78. The Welsh Government response to the above highlights the national planning policy set out in Planning Policy Wales and Technical Advice Note (TAN) 23 which support economic development in Local Growth Zones, and for rural areas in [TAN_6: Planning for Sustainable Rural Communities \(2010\)](#). In addition Local Authorities are expected to set out their proposals for economic growth in up to date Local Development Plans.

Cleddau 2 Coast Fishing Local Action Group Local Development Strategy 2011 - 2013

79. This group was established in July 2011 and comprises 18 members from the fishing industry (7); private sector (4); Voluntary sector (5); and Public sector (3). The strategy defines a fishing area of almost 115,000ha within Pembrokeshire including almost all of the National Park.

80. The fishing fleet is identified as occupying the following harbours:

Table 4:

Port/Harbour	No. Vessels
Abercastle	4
Angle	2
Broad Haven	2

Port/Harbour	No. Vessels
Castle Pill	3
Dale	2
Dinas Head	1
Fishguard	11
Freshwater Bay/Stackpole	5
Goodwick	2
Llangwm	1
Little Haven	3
Llanstadwell	2
Milford Haven	26
Neyland	9
Pembroke	4
Porthgain	7
Porthclais	1
Saundersfoot	11
Solva	10
St Brides Bay	2
St Davids	1
Tenby	8
Total	119

Locations within the National Park are shaded blue.

81. The objectives of the group are as follows:

- Objective A: Improving competitiveness in the fisheries area
- Objective B: Adding value to fisheries products
- Objective C: Regeneration and tourism in the fisheries area
- Objective D: Diversification from and within the fishing industry

82. A number of measures and actions are proposed. Of relevance here are:

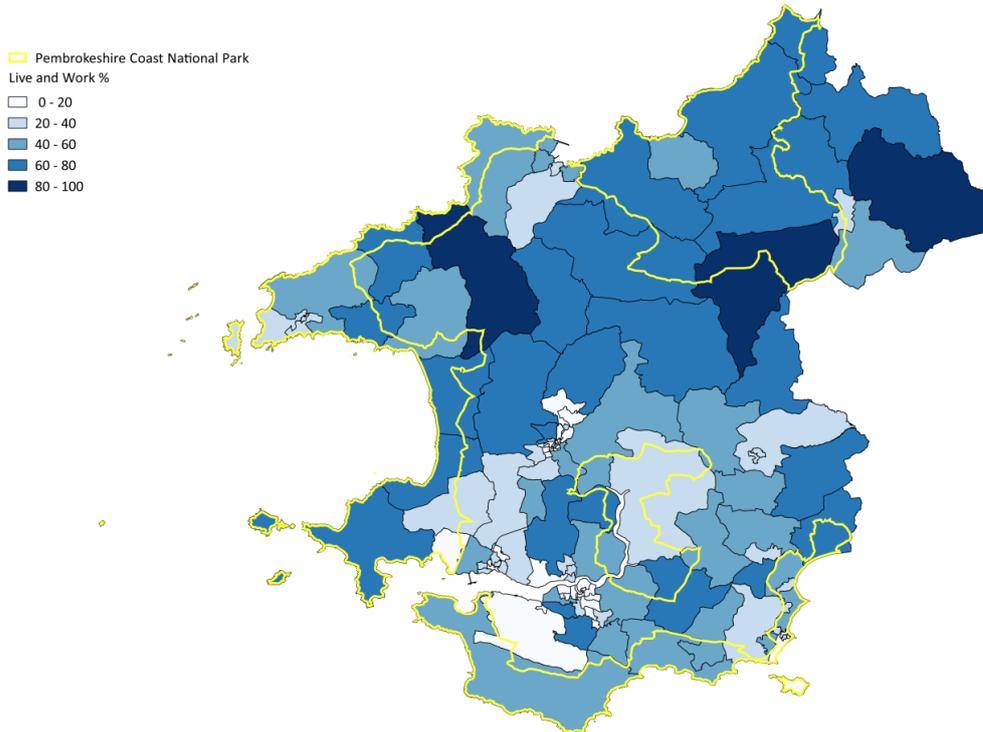
- Joint action to create new or improve existing facilities at ports and harbours.
- Realise the full extent of existing and potential synergies between fishing and tourism including shared use of harbours.
- Projects to improve areas suffering from notable degradation whether in the built or natural environment.

83. The policies of the Local Development Plan support these measures and actions. Of particular relevance are 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 8 Special Qualities (Strategy Policy), Policy 15 Conservation of the Pembrokeshire Coast National Park, Policy 17 Shore Based Facilities, Policy 18 Porthgain, Saundersfoot, Solva and Tenby Harbours and Policy 35 Visitor Economy (Strategy).

Workplace zones

84. Workplace zones are a new geography that was introduced for the 2011 census to supplement the census output areas. Workplace zones are designed to contain consistent numbers of workers based on where people work, whilst OAs are designed to contain consistent numbers of people based on where they live.

85. The following map shows the work place zones in Pembrokeshire with a colour gradation indicating the proportion of the persons working in each zone (aged 16+) that also live within that zone.



Evidence of Need for Employment Premises

Information provided by Pembrokeshire County Council Economic Development Department (August 2007 and updated March 2014)

86. Through the enquiries we get and through the businesses we deal with, the central commercial zones of Milford Haven, Pembroke Dock and Haverfordwest are slowly being developed to cope with demand. However these developments are only really soaking up part of the demand. The county as a whole does have a shortage of good sustainable industrial units compared with the demands.

87. The county continues to see a shortage of industrial and small business units outside of the main towns of Haverfordwest, Milford Haven and Pembroke Dock. This is currently the subject of a review being undertaken by the County Council's Economy Overview and Scrutiny committee and a report will be made available on its

publication.[This was an analysis of industrial estates managed by Pembrokeshire County Council's and sites allocated in the County Council's Local Development Plan, the level of occupation/vacancies and levels of demand. It did not include sites allocated in the National Park Local Development Plan].

88. Most noticeable shortages are in areas in the south of the County around Tenby and Saundersfoot and in the north from St Davids through to Newport and then back down the eastern side of the County through Crymych etc. The result of this is people having to commute by road to alternative locations. This adds to traffic congestion and air pollution. An additional issue is that people living in rural areas have limited public transport options to get them to work on time.
89. We are of the opinion that practical steps can be taken to ease these issues:
- a) Improved broadband infrastructure, possibly incorporating overhead cable and/or radio masts;
 - b) Conversion of redundant agricultural buildings into workshops;
 - c) Criteria-based policies to enable appropriate employment site development in rural areas;
 - d) Provision of cheap, renewable energy to provide the power needs of both residents and businesses.
90. Unless people have the opportunity to live and work locally we will see depopulation of the rural areas, especially amongst younger age groups. Such an outward migration of young people and young families will, in the future, lead to increasing social problems.
91. As a planning authority the National Park Authority can allocate or protect land and buildings for employment use but is unable to provide new industrial units. Land identified for employment use will require significant investment in infrastructure and services. There is a concern that reduced public sector funding will discourage private sector investment and limit the amount of land that is readily available for development. Greater focus on criteria based planning policy should ensure flexibility to address employers/developers needs with due regard to environmental and other constraints. Deleting employment allocations as set out in Table 5 below will not preclude the consideration of sites within or adjacent to the identified Centres of the National Park up to 2 hectares in size. A range of other policy approaches are available including conversion of buildings. Appendix 2 sets out the full framework.
92. The County Council's report to the Economy Overview and Scrutiny Committee in June 2014 had a number of recommendations relating to property in the Council's ownership. In relation to the National Park Authority it was recommended that "*the duty to promote economic and social wellbeing be elevated to site alongside its conservation and interpretation statutory purposes.*" It is not within the power of the National Park Authority to change the legislation which sets out the purposes of the National Parks. This is currently being considered by the Welsh Government.

93. Land has been allocated in Tenby and Saundersfoot for mixed uses. Table 5 below sets out which of these sites have been developed. In St Davids land allocated for employment use and business use has not been developed and the National Park Authority has not had any applications or expressions of interest in them being developed. The land owners of the employment allocation have advised that they do not wish to sell nor use the land for development. The generic policies of the Plan will allow for consideration of proposals coming forward for employment use – see commentary above.
94. The Pembrokeshire Employment Survey Report 2016 and associated spreadsheet and maps are available to view on the County Council's website.
95. The Local Development Plan generally supports the practical steps suggestions provided by the Council, subject to the usual detailed consideration of design, siting etc.

Joint Scrutiny Committee on the impact of the policies and work of National Park Authorities (Snowdonia and Pembrokeshire Coast) on economic activity of both National Parks July 2015

96. The recommendations which refer directly to Local Development Plan policies are:
- a. National Park Authority policies need to be drawn up with a degree of tolerance and sufficient flexibility so as to be able to take into account changing economic and market circumstances and the differing needs of business, or to be in place for a shorter time period which would allow more regular refreshment and updating.
 - b. National Park Authorities should seek to develop closer working relationships with Local Authority economic development teams. There should be an agreed focus and action plan to jointly address the identified needs. Likewise Local Authority economic development departments should fully embrace the potential of protected areas in driving economic benefits. This would provide a focus to assess the impact of future policies and actions with particular reference to the imminent review of Local Development Plans.
 - c. The contribution and impact of the wider work of National Park Authorities on the business community should be recognised. Policies such as those to provide affordable housing and accessibility should be monitored, reviewed and amended, where necessary, to take account of the reality of living in rural Wales, with limited public transport availability.
97. Regarding 'a' the Local Development Plan is required to meet the tests of soundness Test 3 advises that the Plan needs to be sufficiently flexible to and there needs to be appropriate contingency

provisions. The guidance also advises that Plan also needs to have policies written that enable them to provide a robust and consistent framework for considering planning applications - Test 2. These matters will be addressed through review and will be tested through Examination. The review process is dictated by Welsh Government policy and guidance. Regarding 'b' Officers of the Authority continue to liaise with Pembrokeshire County Council's economic development officers and planning officers as part of the review. Recommendations given are included in this background paper to be addressed through the review process. Regarding 'c' the review of affordable housing policy is considered in the Housing Background Paper and accessibility issues through the Scale and Location of Growth Background Paper.

Appendix 1 Extract from Pembrokeshire County Council, The Local Development Plan and the Pembrokeshire Economy – Page 51 - December 2010

(please note paragraph numbering is not as per original.)

- 1) The Council has identified the need to draw together the disparate evidence used to establish whether the strategic and general policy approach to the provision of employment land through the LDP for the period from adoption to 2021 is sufficiently resilient to meet existing needs and changing economic circumstances.
- 2) There is considerable **uncertainty** over future direction, scope and scale of economic development resulting in a broad spectrum of scenarios for the international energy, UK, Wales economies and Pembrokeshire. The LDP must respond to this uncertainty with a resilient framework of strategic policies for economic development complemented by site allocations and strong policy criteria.
- 3) **Land identified for employment use will require significant investment** in infrastructure and services. There is concern that reduced public sector funding will discourage private sector investment and limit the amount of land that is effectively available for development. **Greater focus on criteria based planning policy should ensure flexibility to address employers/developers needs with due regard to environmental and other constraints.**
- 4) Businesses are seeking affordable premises and the need to build to BREEAM Excellent standard significantly adds to build costs. These premiums are passed on via higher rentals etc. that businesses find difficult to afford. This is especially true of engineering and similar businesses where large doors are left open for access and ventilation and some of the benefits of BREEAM excellent standards of insulation may be lost.
- 5) There are potential threats to the economy with global changes in the oil economy and with the two **Pembrokeshire refineries** being for sale, as major oil companies consider withdrawing from the downstream activities¹.
- 6) There are specific opportunities for the local economy in the form of **Renewable Energy** (especially the development of Marine Energy Technologies), **Quality Tourism, Agrifood and niche manufacturing**. These activities may stimulate new investment and employment creation on sites with the necessary locational characteristics and there will be **a need for flexibility** within the planning system to consider individual cases on their merits.
- 7) During the period of the JUDP the availability of employment land has changed significantly due to large scale take up for major energy projects at South Hook, Waterston and the Pembroke Power Station site. This reversed the trends of the previous ten years when large brownfield sites became available. Blackbridge and Trecwn however still represent considerable “opportunity assets” for development requiring their rare locational characteristics.
- 8) A combination of employment land allocations and criteria based policy is required to meet the land use requirements for dispersed rural enterprise and to ensure that appropriate employment land can be brought forward to meet location specific, diverse and unpredictable needs of rural enterprises.

¹ in all 6 of the 9 major British refineries are currently for sale

- 9) Detailed information on infrastructure and service constraints will be made available in supplementary planning guidance.
- 10) The land use implications of the Pembrokeshire economy **place a mix of requirements** for the LDP, embracing specific land use allocations, policies protecting existing employment land, minerals resources and environment and cultural heritage and criteria based policies which provide the basis for securing the right scale and type of development in the appropriate locations in accordance with the settlement hierarchy and the distinctive requirements of the economy, including, at opposite ends of the spectrum:
- for a small number of major development sites, including for energy and port related development, that may come forward over an elongated time span and which will require extensive project development and
 - for small scale development across rural Pembrokeshire.
- 11) Waste planning requirements for the LDP recognise the suitability of some employment land allocations for certain types of waste treatment and set out criteria for allocations for other types of
- 12) In relation to renewable energy the County Council has identified the need² for:
- sites for stand alone renewable energy projects,
 - requirements for renewable energy to be incorporated into major development sites and
 - co-location of waste energy uses/ renewable energy sources with energy consumers,
 - developing the potential in Pembrokeshire for servicing the renewables industry and associated Research and Development both on and off-shore.
- 13) Generally there has been poor take up of JUDP allocated sites and evidence is weak that allocating a site in a rural area is effective in providing for the needs of rural enterprise. There are some significant questions about the way the rural economy functions and a criteria based economy is preferred to allocations as more responsive to the particular opportunities that arise.
- 14) There is continuing squeeze on agriculture, with changing patterns of farming practice and flux between those intensifying the scale of operations, and those reducing the intensity and securing added value through quality and 'local food miles'. Increasing pressures on the Pembrokeshire housing market from tourism and those making lifestyle choices will ensure continuing employment and housing challenges for young people, with significant reverse commuting and a prevalence of low paid / part time / seasonal jobs.
- 15) The ageing population structure, considered alongside continuing pressures for young people to leave Pembrokeshire for education/ employment and housing is likely to continue with future growth of the rural economy predicated on tourism, personal health care and rural services. The authority recognises the importance of housing market choice and affordable housing within the Pembrokeshire economy.
- 16) The Pembrokeshire economy has a history of vulnerability to major plant closures brought about via external influences and decisions. Land and infrastructure requirements need to be regularly reviewed to ensure that they meet the needs of employers and investors. The WAG proposal to use the Spatial Plan process to identify infrastructure requirements will help to highlight the performance of the commercial property market, it's successes and failures.

² Pembrokeshire County Council: LDP Background Paper on Renewable Energy 2010

- 17) The authority has worked with other private and public sector organisations to ensure that the draft LDP meets the needs of businesses, investors and residents.
- 18) The Authority is committed to providing resilience within the LDP in the face of these unprecedented economic uncertainties. In response to these uncertainties the LDP shall build in flexibility by identifying a range of employment sites in terms of size and location, with particular emphasis on identifying allocations to develop energy and port related economic growth around the Haven Waterway, providing opportunities for employment growth close to the main centres of population and providing for the particular needs of rural enterprise through focussed allocations supported by strong criteria based policies.

Appendix 2 Employment Related Activity and Policies

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
Major Development (including Hazardous Installations, Ministry of Defence proposals, Minerals extraction)	Major Development Test – Planning Policy Wales may permit such developments in exceptional circumstances. e.g, Combined Heat and Power Plant Milford Haven	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
National Planning Policy	Pantgwyn Quarry, extension to minerals extraction area. Trefigin Quarry – extension to minerals extraction area.					
Workshops/ Industrial Units Policy 42	National Policy within or adjacent to Applies to Centres identified in the National Park (see Map 2 in this Background Paper)	<input checked="" type="checkbox"/>				
National Planning Policy	Example existing units at Newport, St Davids. For business, general industrial, storage and distribution. (up to 2 hectares)					
Local Development Plan Review: Update required to reflect national planning policy by adding ‘...or adjacent to..’						

³ Tenby – Local Service & Tourism Centre,

St Davids, Newport, Saundersfoot, - Local Centre

Rural Centres: Amroth ,Angle, Bosherton, Broad Haven, Dale, Dinas Cross, Felindre Farchog, Herbrandston, Jameston, Lawrenny, Little Haven, Manorbier, Manorbier Station, Marloes Newgale, Pontfaen, Solva, St Ishmaels, Trefin, Coshaston, Hook*, Houghton*, Llangwm*, Milton*, New Hedges, Pleasant Valley*, Roch*, Square and Compass, Summerhill

*Lies predominantly within the County Council’s planning jurisdiction

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
Local Waste Management Facilities (Policy 27)	Where the proposal predominantly serves the need of the National Park community. Recycling Centres, waste transfer stations, landfill sites, composting facilities.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
Conversion of Buildings in the Countryside (Policy 7d) Plan Review: Revisit conversion policy for employment uses to provide more employment opportunities. See Scale & Location of Growth Background Paper	Accessibility criterion applies in the countryside conversions unless it is a live work unit. Examples: Fisherman's accommodation and boat storage and maintenance – Solva – live work unit. Conversion of 2 barns to woodworking studio/workshop - Pencaer					<input checked="" type="checkbox"/>
Farm Diversification (Policy 7c)	The current Local Development Plan relies on Planning Policy Wales for a policy context for farm diversification. A policy is proposed for the replacement Plan Examples of permissions granted: Bunk house accommodation Holiday accommodation No accessibility criterion No need to limit to farming related uses. Examples – Musselwick	<input checked="" type="checkbox"/>				

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
	Farm near Marloes – conversion of outbuildings to 5 holiday lets;					
Borrow Pits /Local Building Stone Policy 23 & 24	Local construction industry benefitting from locally sourced materials. Borrow Pits Nolton/Druidston Equine Track			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Tourist attraction or recreational facility that requires a rural location Policy 35	Supplementary Planning guidance on the types of recreational uses appropriate in different parts of the National Park.			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Low Impact Development Policy 47	Subsistence employment. Supplementary Planning Guidance Low Impact Making a Positive Contribution			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
New Farm Buildings for agricultural purposes Policy 7h)	Examples – Removal of 4 ad-hoc buildings and caravan to be replaced with 1 new build agricultural storage/tractor shed – Llanrhian. Supplementary Planning Guidance Siting and Design of Farm Buildings			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
Shore Based facilities & Renewable Energy connections (Policy 17) and (Policy 33)	<p>Aimed towards the developed coast. Technically feasible locations for onshore connections to off shore renewable energy uses may require locations on the undeveloped coast. Others include lifeboat stations, landing stages, pontoons and slipways.</p> <p>Examples St David's lifeboat station.</p> <p>Permission for grid connection to. Ramsey Sound Delta Stream unit.</p>					
Porthgain, Saundersfoot, Solva and Tenby Harbour (Policy 18)	<p>Supporting development that sustains harbour activity.</p> <p>Examples: Mixed use development at the Jones and Teague site at Saundersfoot – including commercial and residential uses.</p>					
Renewable Energy (Policy 33)	<p>Small scale wind turbines approved at Hendre Farm St Davids, Landway Farm Jameston, Shipping Hill Farm, Beavers Hill, Norchard Farm and Thornhill, Manorbier, Glasdir Farm Nevern, Rainbolts Hill Roch, Pearson Farm and Windmill Farm St Brides, Trewarren Farm St Ishmaels, Cherinlee Broad Haven.</p> <p>Solar arrays approved at the MOD Merrion Camp and Upper Porthmawr St Davids, approved on listed buildings such as St Brides Castle and</p>					

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
	<p>incorporated into housing schemes such as Ty Solar at Glanrhyd and numerous householder and agricultural building applications where not classed as permitted development.</p> <p>Biomass approved at Hope Cove Druidstone in an adjacent barn to the dwellinghouse, householder extension to house a new boiler at Broomhill Farm Martletwy and numerous approvals for flues where not classed as permitted development.</p> <p>Hydro run-off river scheme approved at Pontfaen (100kw) generating enough electricity to power approximately 80 homes per year.</p> <p>Air source heat pumps approved at Teggars Brewery development site in Saundersfoot (for Tesco), Royal Playhouse Cinema in Tenby, numerous householder applications approved where not classed as permitted development.</p> <p>Tidal grid connections approved for the Ramsey Sound test facility at St Justinians.</p> <p>Supplementary Planning Guidance on Renewable Energy Supplementary Planning Guidance on Cumulative Impacts of Turbines</p>					
Visitor	No increase in number.	☒	☒	☒	☒	☒

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
<p>Economy (Policy 38 & 39, 40 & 41) Camping Caravanning or chalet developments</p> <p>Plan Review: Sites in the National Park are now almost fully occupied. A review of policy will be undertaken following publication of a study on landscape capacity for such development.</p>	<p>Some upgrading permitted.</p> <p>Demolition of unused toilet blocks and replacement with 2 additional static caravan pitches within an existing site at Newgale. Changeover from 40 tent pitches to 20 touring caravan pitches and 20 tent pitches at Moreton, Saundersfoot</p> <p>Aim is to:</p> <ul style="list-style-type: none"> - lengthen the season all year round without adverse impact on the landscape. - Improve quality <p>Environmental improvements supported.</p>					
<p>Protecting against the loss of hotels (Policy 36)</p>	<p>Tests included for release to other uses in the policy</p> <p>Former Royal Gatehouse site Tenby – redevelopment continues to provide for hotel accommodation with residential and commercial development.</p> <p>Royal Hotel in Broad Haven – conversion to care home.</p>					
<p>Protecting existing employment sites (Policy 43)</p>	<p>Tests included for release to other uses in the policy</p>					
<p>Policy 49 (Retail in the National Park)</p>	<p>Supported in a range of Centres.</p> <p>Royal Mail Depot, Tenby. Outside of Town Centre but not found to be</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
	<p>detrimental to its vitality or vibrancy. Development will include provision of a new convenience store.</p> <p>Residential dwelling and extension to existing shop at Jameston.</p> <p>Replacement reception, office and shop at Amroth Castle.</p>					
Policy 50 Town & District Shopping Centres	<p>A range of uses supported</p> <p>Royal Gatehouse Development - mixed use including new ground floor retail space of approximately 450m² and is expected to be used for comparison goods.</p> <p>Redevelopment of the Cambrian Hotel in Saundersfoot to mixed use including 6 additional retail units with a combined floor space of approximately 768m². A1, A2 and A3 uses are proposed.</p> <p>The new Tesco Express Store in Saundersfoot District Centre is now complete and in use, approved under This store provides approximately 347m² of additional convenience floor space.</p> <p>Natural Healthcare Centre in Newport – policy used to protect against the loss of a retail unit within the Centre to residential use.</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Policy 51 Garden Centres	Supported within or adjacent to Centres	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Policy 55 &	Criteria based policies					

Type	Commentary	Centres ³		Adjacent to Centres New Build	Countryside	
		New Build	Conversion		New Build	Conversion
56 Telecommunications Powerlines & Pipelines	<p>Mobile Infrastructure Project has identified sites within the National Park – new masts may be required.</p> <p>Numerous prior approval applications for telecommunications development (telegraph poles, lines, broadband cabinets etc).</p>					

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