

Appendix A: Detailed Appraisal matrices

Detailed appraisal of the Local Development Plan Vision

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.

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 on the larger 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.

New development has been directed to communities linked by a convenient, low-impact and affordable public transport network. Significantly, improved cycle and public rights of way networks provide a clean and easily accessible means of transport for our communities as well as support for increased recreational activity.

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.

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.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity	++	The farm diversification schemes aspired to in the vision are likely to represent a significant means by which farming and forestry become more viable while delivering the environmental and social benefits required by this Sustainability Objective.

and community well being.		
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	The goal of an effective and low-impact public transport system, coupled with development located to most effectively exploit this, and in improved infrastructure for cycling and walking will mean that residents and visitors will have real alternatives to using cars in most circumstances.
3. 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	++	The opening statement of the Vision is for a National Park that has retained, or even enhanced, the special character of its landscape and built environment.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Improvements to cycleways and footpaths will facilitate the activities sought by their Sustainability Objective. The final paragraph envisages a Park where activity in the Park very much reflects this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	The aspiration is for a Park that has something to offer and attracts visitors throughout the year.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	The aspiration for building design that takes into account the changing climate, and the avoidance of vulnerable areas indicates a desire that the Local Development Plan will have contributed to meeting this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	The aspiration for a transport system less dependent on cars, and development that is sustainably designed, and increased use of renewable energy accords with this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The vision recognises that the need to protect the unique qualities of the National Park will limit the opportunities for development, but the goal is that what development is possible serves the needs of the community
9. Encourage access for all to the National Park, reflecting the social	+	The vision aims for a National Park that is socially inclusive and attractive to all.

mix of society.		
10. Maintain the cultural distinctiveness of communities.	+	The aspiration for development focused on the provision of affordable housing will help ensure that the children of Park Residents are more likely to be able to continue to live in the Park should they choose to do so, thus helping maintain the social make-up of communities. The aspiration for development that reflects and develops the distinctive vernacular of the Park also contributes to this Sustainability Objective.
11. 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.	+	Though not specifically mentioned in the Vision, the goal of a Park that has been protected from damaging development should contribute towards this Sustainability Objective.
12. Reduce the negative impacts of waste.	+	Though not specifically mentioned in the Vision, the goal of a Park that has been protected from damaging development should contribute towards this Sustainability Objective. The impact of litter and fly-tipping, which are significant waste problems in the National Park, is unlikely to be addressed through landuse planning, these are more likely to be addressed through law enforcement and changes in public behaviour.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	The goal to ensure that what development is possible is aimed at the need of the Park communities should help ensure that this Sustainability Objective is met.
14. Maintain and enhance biodiversity both within and outside designated sites	++	The aspiration that the National Park's special qualities are maintained and enhanced will contribute to this Sustainability Objective as the Park's biodiversity is an important special quality of the Park, both directly and through its contribution to other special qualities
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0/+	Though not specifically mentioned in the Vision, the goal of a cleaner, richer environment is likely to benefit this objective. It is also difficult to conceive of how the aspirations of the final paragraph of the Vision could be achieved if this Sustainability Objective were not met.

Overall assessment and suggested changes	++	The vision is for a National Park that has retained and enhanced its special qualities. The goal for development is that it is both sustainable and is that most needed by the Park's communities. These communities are themselves sustained and retain their distinctive cultures. In the context of sustaining a National Park the vision represents a completely appropriate set of aspirations.
Recommendation	No change	

Detailed appraisal of Local Development Plan policies

Policy 1: 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: <ul style="list-style-type: none"> a) to aim to meet the housing, in particular affordable housing needs of the local area b) to provide for employment development to meet the needs of the town c) to protect and enhance the town's facilities and town shopping centre which serve the town and rural hinterland. d) to protect and enhance the harbour area. e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities f) to permit proposals that assist in delivering improved traffic management in the town. 		
SA Objective	Sum- mary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents	++	The concentration of development in a hierarchical fashion based on the size and facilities of a settlement should reduce the need for car travel and distances travelled. Enhancing the facilities to serve the town and surrounding rural area should further reduce the need for car travel. Permitting proposals to improve traffic management should help reduce any negative effects within the town

and visitors.		
3. 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	++	Clauses to protect the town's special qualities and harbour, together with the general thrust of the policy to secure the viability of the town, will help ensure that the town's character is maintained.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Developing facilities and homes within walking or cycling distance of each other, together with traffic management approaches which could include provision for walking and cycling are likely to lead more people to participate in these activities
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Development of the facilities of the town could enhance its attractiveness for 'out-of-season' visiting.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Providing that areas vulnerable to flooding either currently, or as a consequence of short to medium term climate change, are avoided, the town is a good place to target development as much of it is more than 20 metres above mean sea level. With regard to public health, the outcome could be mixed, the policy would concentrate any additional population in close proximity to community health care facilities, but at the same time the concentration of population could accelerate the transmission of infectious disease. The focus on meeting community needs will help if a consequence of climate change is increased migration and visitor pressure in western Britain (due to its cooler climate and generally more elevated nature).
7. Reduce factors contributing to climate change.	+	As road transport is a significant contributor to greenhouse gas emissions in this area the effects of this policy to reduce car travel will help achieve this objective. The focus of development in this settlement may also increase the potential for community renewable, or more sustainable, energy schemes.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The focus on development for affordable housing, employment meeting the needs of the town and maintaining the town's facilities will ensure that development in the town helps sustain the community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The focus on affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.

10. Maintain the cultural distinctiveness of communities.	+	The effect of the policy to maintain the character of the town will help preserve the cultural heritage, and the effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up the community have sufficient opportunity to remain within it.
11. 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a relatively large settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste is likely to be more sustainable as the waste will be, spatially, more concentrated.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	The policy directs development towards a location with extensive community facilities (by rural area/ National Park standards). As such it is likely to provide the 'critical mass' to maintain and possibly enhance these facilities
14. Maintain and enhance biodiversity both within and outside designated sites	+	Concentration of development in the National Park's larger settlements will protect those more isolated areas of the National Park where biodiversity may be greater or there is greater potential to restore biodiversity. <u>There is uncertainty regarding effects of some development allocations on the Carmarthen Bay and Estuaries Special Area of Conservation and Carmarthen Bay Special Protection Area particularly relating to water issues and potential in-combination effects with development in neighbouring Authority areas, and Habitat Regulations Assessment at project level will be necessary to ensure no adverse impact. Tenby is adjacent to the Carmarthen Bay Special area of Conservation and Special Protection Area, but the scale of development proposed, in the context of the existing settlement, is unlikely to cause unmanageable negative effects.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Concentrating development is likely to make it easier to deliver effective, reliable sewage treatment facilities. There could be potential to create unattainable requirements for water, but consultation on proposed development sites with Dwr Cymru and the Environment Agency should ensure this does not happen.

Overall assessment and suggested changes	+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits. Project level Habitat Regulations Assessment will be necessary on some allocations to avoid adverse impact on Natura 2000 sites.
Recommendation	No change	

Policy 2: NEWPORT LOCAL CENTRE (TIER 3) (Strategy Policy)

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

- a) to aim to meet the housing, in particular affordable housing needs of the local area
- b) to provide for employment development to meet the needs of the town
- c) to provide an opportunity to develop work/live units in the town(to be identified in the Deposit Local Development Plan)
- d) to protect and enhance the district shopping centre and community facilities which serve the town and rural hinterland
- e) to ensure developments permitted contribute to the protection and enhancement of the town's special qualities
- f) to permit proposals that assist in delivering improved traffic management in the town where these do not compromise the town's special qualities.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents	++	The concentration of development in a hierarchical fashion based on the size and facilities of a settlement should reduce the need for car travel and distances travelled. Enhancing the facilities to serve the town and surrounding rural area should further reduce the need for car travel. Permitting proposals to improve traffic management should help reduce any negative effects within the town

and visitors.		
3. 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	++	Clauses to protect the town's special qualities, together with the general thrust of the policy to secure the viability of the town, will help ensure that the town's character is maintained.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Developing facilities and homes within walking or cycling distance of each other, together with traffic management approaches which could include provision for walking and cycling are likely to lead more people to participate in these activities
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Development of the facilities of the town could enhance its attractiveness for 'out-of-season' visiting.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Providing that areas vulnerable to flooding either currently, or as a consequence of short to medium term climate change, are avoided, the town is a good place to target development as much of it is more than 15 metres above mean sea level, though in the longer term (several hundred years) Newport might prove one of the more vulnerable settlements in the area. The focus on meeting community needs will help if a consequence of climate change is increased migration and visitor pressure in western Britain (due to its cooler climate and generally more elevated nature).
7. Reduce factors contributing to climate change.	+	As road transport is a significant contributor to greenhouse gas emissions in this area the effects of this policy to reduce car travel will help achieve this objective. The focus of development in this settlement may also increase the potential for community renewable, or more sustainable, energy schemes.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The focus on development for affordable housing, employment meeting the needs of the town and maintaining the town's facilities will ensure that development in the town helps sustain the community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The focus on affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.
10. Maintain the cultural	+	The effect of the policy to maintain the character of the town will help preserve the cultural heritage, and the

distinctiveness of communities.		effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up the community have sufficient opportunity to remain within it.
11. 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste may be more sustainable as the waste will be, spatially, more concentrated.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	The policy directs development towards a location with community facilities. As such it is likely to provide the 'critical mass' to maintain and possibly enhance these facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Concentration of development in the National Park's larger settlements will protect those more isolated areas of the National Park where biodiversity may be greater or there is greater potential to restore biodiversity. <u>There is potential for some allocations to effect the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation. Habitat Regulations Assessment should be carried out at project level to avoid these effects or ensure effective mitigation measures are in place.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Concentrating development is likely to make it easier to deliver effective, reliable sewage treatment facilities. There could be potential to create unattainable requirements for water, but consultation on proposed development sites with Dwr Cymru and the Environment Agency should ensure this does not happen.

Overall assessment and suggested changes	+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits. <u>Project level Habitat Regulations Assessment will be necessary on some allocations to avoid adverse impact on Natura 2000 sites.</u>
Recommendation	No change	

Policy 3: SAUNDERSFOOT LOCAL CENTRE (TIER 3) (Strategy Policy)

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

- a) to aim to meet the housing, in particular affordable housing needs of the village
- b) to encourage small scale employment opportunities.
- c) to protect and enhance the district shopping centre and community facilities which serve the village and rural hinterland
- d) to ensure developments permitted contribute to the protection and enhancement of the village's special qualities
- e) to permit proposals that assist in delivering improved traffic management in the Centre and accessibility to the railway station
- f) to protect and enhance the village's harbour.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	++	The concentration of development in a hierarchical fashion based on the size and facilities of a settlement should reduce the need for car travel and distances travelled. Enhancing the facilities to serve the town and surrounding rural area should further reduce the need for car travel. Permitting proposals to improve traffic management should help reduce any negative effects within the town

3. 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	++	Clauses to protect the town's special qualities and harbour, together with the general thrust of the policy to secure the viability of the town, will help ensure that the town's character is maintained.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Developing facilities and homes within walking or cycling distance of each other, together with traffic management approaches which could include provision for walking and cycling are likely to lead more people to participate in these activities
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Development of the facilities of the town could enhance its attractiveness for 'out-of-season' visiting.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+?	Providing that areas vulnerable to flooding either currently, or as a consequence of short to medium term climate change, are avoided, the town is a good place to target development as much of its residential area is more than 20 metres above mean sea level. However, much of the commercial centre of the settlement is lower lying and may be vulnerable to sea level rises in the short to medium term (over the next two hundred years). There are no new development allocations in the settlement, but any unallocated development in the commercial centre or harbour area will need to take into account its potential vulnerability to flooding. The focus on meeting community needs will help if a consequence of climate change is increased migration and visitor pressure in western Britain (due to its cooler climate and generally more elevated nature).
7. Reduce factors contributing to climate change.	+	As road transport is a significant contributor to greenhouse gas emissions in this area the effects of this policy to reduce car travel will help achieve this objective. The focus of development in this settlement may also increase the potential for community renewable, or more sustainable, energy schemes.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The focus on development for affordable housing, employment meeting the needs of the town and maintaining the town's facilities will ensure that development in the town helps sustain the community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The focus on affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.

10. Maintain the cultural distinctiveness of communities.	+	The effect of the policy to maintain the character of the town will help preserve the cultural heritage, and the effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up the community have sufficient opportunity to remain within it.
11. 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste may be more sustainable as the waste will be, spatially, more concentrated.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	The policy directs development towards a location with community facilities. As such it is likely to provide the 'critical mass' to maintain and possibly enhance these facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Concentration of development in the National Park's larger settlements will protect those more isolated areas of the National Park where biodiversity may be greater or there is greater potential to restore biodiversity. Saundersfoot is adjacent to the Carmarthen Bay Special area of Conservation and Special Protection Area, but the scale of development proposed, in the context of the existing settlement, is unlikely to cause unmanageable negative effects.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Concentrating development is likely to make it easier to deliver effective, reliable sewage treatment facilities. There could be potential to create unattainable requirements for water, but consultation on proposed development sites with Dwr Cymru and the Environment Agency should ensure this does not happen.

Overall assessment and suggested changes	+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits.
Recommendation	No change	

Policy 4: ST DAVIDS LOCAL CENTRE (TIER 3) (Strategy Policy)

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

- a) to aim to meet the housing, in particular affordable housing needs of the local area**
- b) to provide for employment development to meet the needs of the City**
- c) to provide for live/work units in the City**
- d) to protect and enhance the district shopping centre and community facilities which serve the City and rural hinterland**
- e) to ensure developments permitted contribute to the protection and enhancement of the City's special qualities**
- f) to permit proposals that assist in delivering improved traffic management in the City and wider peninsula**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	++	The concentration of development in a hierarchical fashion based on the size and facilities of a settlement should reduce the need for car travel and distances travelled. Enhancing the facilities to serve the town and surrounding rural area should further reduce the need for car travel. Permitting proposals to improve traffic management should help reduce any negative effects within the city
3. Conserve and enhance landscapes, townscapes and	++	Clauses to protect the city's special qualities, together with the general thrust of the policy to secure the viability of the city, will help ensure that the town's character is maintained.

seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Developing facilities and homes within walking or cycling distance of each other, together with traffic management approaches which could include provision for walking and cycling are likely to lead more people to participate in these activities
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Development of the facilities of the city could enhance its attractiveness for 'out-of-season' visiting.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Providing that areas vulnerable to flooding either currently, or as a consequence of short to medium term climate change, are avoided, the town is a good place to target development as most of it is more than 30 metres above mean sea level, as well as in a relatively sheltered inland location. The focus on meeting community needs will help if a consequence of climate change is increased migration and visitor pressure in western Britain (due to its cooler climate and generally more elevated nature).
7. Reduce factors contributing to climate change.	+	As road transport is a significant contributor to greenhouse gas emissions in this area the effects of this policy to reduce car travel will help achieve this objective. The focus of development in this settlement may also increase the potential for community renewable, or more sustainable, energy schemes.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The focus on development for affordable housing, employment meeting the needs of the town and maintaining the town's facilities will ensure that development in the town helps sustain the community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The focus on affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.
10. Maintain the cultural distinctiveness of communities.	+	The effect of the policy to maintain the character of the town will help preserve the cultural heritage, and the effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up the community have sufficient opportunity to remain within it.
11. The adverse effects of minerals exploitation in the	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a settlement may increase the likelihood of the

National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste may be more sustainable as the waste will be, spatially, more concentrated.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	The policy directs development towards a location with community facilities. As such it is likely to provide the 'critical mass' to maintain and possibly enhance these facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Concentration of development in the National Park's larger settlements will protect those more isolated areas of the National Park where biodiversity may be greater or there is greater potential to restore biodiversity. <u>There is potential for some allocations to effect the North West Pembrokeshire Commons and St David's Special Areas of Conservation, and the Ramsey and St David's Peninsula Coast Special Protection Area. Habitat Regulations Assessment should be carried out at project level to avoid these effects or ensure effective mitigation measures are in place.</u> The Northwest Pembrokeshire Commons, St Davids, and Pembrokeshire Marine SACs are all close to the settlement but the scale of development proposed, in the context of the existing settlement, is unlikely to cause unmanageable negative effects
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Concentrating development is likely to make it easier to deliver effective, reliable sewage treatment facilities. There could be potential to create unattainable requirements for water, but consultation on proposed development sites with Dwr Cymru and the Environment Agency should ensure this does not happen.
Overall assessment and suggested changes	+	Through its focus on maintaining the character of the town and meeting the needs of its population the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits. <u>Project level Habitat Regulations Assessment will be necessary on some allocations to avoid adverse impact on Natura 2000 sites.</u>
Recommendation	No change	

Policy 5: RURAL CENTRES (TIER 4) (Strategy Policy)

In Rural Centres the land use priorities will be:

- a) to aim to meet the housing, in particular local affordable housing needs of the Centre.**
- b) to encourage small scale employment developments**
- c) to protect and enhance the Centre's range of facilities**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	May provide diversification opportunities, as well as providing homes for people working in farming or related activities and provide community facilities for farmers, farm workers and their families, particularly for those farms near settlements.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-?	Development in the smaller settlements is likely to promote car travel, as there will be some services that cannot be provided at this level and public transport may be less frequent than in the larger settlements. Having said that the hierarchical approach to development contained in policies 1 to 6 suggests that only the relatively small amount of development necessary to maintain settlements will occur in rural centres. Therefore the amount of extra car use generated will be small, and in some cases offset by the continued availability of community facilities and employment opportunities, or mitigated by transport policies elsewhere in the Plan
3. 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	+	Concentrating development in rural centres, rather than the surrounding countryside, will help preserve the rural landscape, and, provided that development is appropriate in scale and nature, the character of the rural centres and their setting.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Developing facilities and homes within walking or cycling distance of each other is likely to lead more people to participate in these activities
5. Increase the number of visitors	0	The policy is unlikely to prove relevant to this Sustainability Objective.

using the National Park outside the peak visitor season.		
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+?	This policy covers a number of centres across the National Park, with different vulnerabilities to the effects of climate change, and as such the effects are uncertain. Having said that the policy is aimed at relatively small amounts of development aimed at sustaining the communities, so it is unlikely that significant inappropriate development in terms of a changing climate will occur. The focus on meeting community needs will help if a consequence of climate change is increased migration and visitor pressure in western Britain (due to its cooler climate and generally more elevated nature).
7. Reduce factors contributing to climate change.	-?	As concluded for Sustainability Objective 2 there is a potential within this policy for increased travel and car use, though the increase is likely to be small and may be offset by the maintenance or enhancement of facilities locally
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The focus on development for affordable housing, employment meeting the needs of the centres and maintaining the centre's facilities will ensure that development in the centre helps sustain the community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The focus on affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.
10. Maintain the cultural distinctiveness of communities.	+?	If the effect of the policy is to maintain the characters of the centres it will help preserve the cultural heritage. The effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up these communities have sufficient opportunity to remain within them.
11. 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Locating development within a centre may increase the likelihood of the redevelopment of brownfield sites with the potential for the recycling of building material.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste may be more sustainable as the waste will be, spatially, more concentrated in rural centres as opposed to dispersed across the wider countryside.
13. Community facilities (including	+	The policy directs development towards locations with a core range of community facilities. As such it may

health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population		help to provide the 'critical mass' to maintain and possibly enhance these facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Concentration of development in the National Park's centres rather than the countryside will protect those more isolated areas of the National Park where biodiversity may be greater or there is greater potential to restore biodiversity. <u>Development allocations in Broad Haven, Lawrenny and St Ishmaels have the potential for Likely Significant Effect on Natura 2000 sites. Some centres are close to Natura 2000 sites but the scale of development proposed, in the context of the existing settlements, is unlikely to cause unmanageable negative effects.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Concentrating development is likely to make it easier to deliver effective, reliable sewage treatment facilities. There could be potential to create unattainable requirements for water, but consultation on proposed development sites with Dwr Cymru and the Environment Agency should ensure this does not happen.
Overall assessment and suggested changes		Through its focus on meeting community needs and the concentration of development in existing centres rather than dispersing it through the countryside the policy performs well in the context of the Sustainability Appraisal. The concerns over mineral use and waste generation reflect that any proposal that leads to development may have unsustainable elements that must be offset by the benefits. <u>Project level Habitat Regulations Assessment will be necessary on some allocations to avoid adverse impact on Natura 2000 sites.</u>
Recommendation	No change	

Policy 6: COUNTRYSIDE (TIER 5) (Strategy Policy)

Outside the identified Centres of the Local Development Plan area development will be strictly controlled except for:

- a) it constitutes sensitive filling in of small gaps or minor extensions to isolated groups of dwellings is proposed. Priority will be given to meeting affordable housing needs. 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) housing for essential farming or forestry needs is proposed
- c) farm diversification including farm shops is proposed
- d) it constitutes the conversion of appropriate buildings to a range of uses with affordable housing delivery being given priority in a residential conversion. Accessibility to the Centres will be an important consideration. Conversion must not result in unacceptable impacts upon the structure, form, character or setting of the building. Buildings considered inappropriate for conversion can be re-used as building material.
- e) Tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential - see Policy 23
- g) The enhancement of community facilities is proposed
- h) The proposal constitutes low impact development making a positive contribution - see policy 35
- i) New farm buildings are justified for agricultural purposes

Traffic impact analysis will be an important consideration in proposals – see Policy 40.

SA Objective	Summary	Commentary. Note - the wording of the policy implies that development proposals meeting the criteria a to i will not be 'strictly controlled'. It is assumed for the assessment that this not the case and development proposals meeting these criteria will be controlled in accordance with the other policies of the LDP and National Park Purposes. In order that this implication is avoided 'be strictly controlled' could be replaced with 'not be permitted'.
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	The policy allows for developments on farms to diversify the business, accommodate workers, and provide additional facilities for the business. This will at least remove some of the constraints that might be limiting the success of the business. There is not guarantee that the potentially more viable business will deliver biodiversity or landscape gains, though other plan policies might ensure this is the case. More economically secure farm businesses would probably deliver the social and community well being appropriate for the National Park.
2. Decrease the length and number of journeys made by	-?	By restricting the development that occurs in the countryside there will be a restriction of any extra travel and car use as well. Though by not prohibiting that development there is likely to be some increase in car

private car to and within the National Park by both residents and visitors.		use, possibly in those areas where public transport or other no car modes of transport are least able to provide an alternative.
3. 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	+	Restricting development in the countryside will help protect the landscape given that development is generally perceived as a detrimental element in the landscape. The clause allowing conversion will help preserve or restore buildings of historic or landscape value, though this may be undermined by encouraging the removal and recycling of buildings deemed unsuitable for conversion, as these may have historic or landscape value. This clause should be reworded to safeguard such buildings.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	Protection of the countryside of the National Park is likely to ensure no decrease but unlikely to secure an increase.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+?	Provided areas at current or foreseeable future risk of flooding are avoided then this policy is unlikely to give rise to activity that would hamper adaptation to a changing climate. The priority given to affordable housing will help if a consequence of climate change is increased migration and visitor pressure in western Britain (due to its cooler climate and generally more elevated nature).
7. Reduce factors contributing to climate change.	-/+	Possible increases in travel and the increased difficulty in involving development in renewable energy schemes is likely to make it more difficult to take steps to reduce greenhouse gas emissions in such development. Having said that the purpose of the policy is to reduce development in the countryside only facilitating it in defined circumstances, so generally development that is unsustainable in greenhouse gas terms is likely to be reduced.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The priority for affordable or essential local housing, providing community facilities will ensure that development helps sustain the community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The priority for affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.

10. Maintain the cultural distinctiveness of communities.	+	The policy should help protect the character of the countryside and will help preserve the cultural heritage (though note concern with regard to Sustainability Objective 3 and buildings unsuitable for conversion). The effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up the community have sufficient opportunity to remain within it.
11. 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.	0	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Having said that the policy will restrict rather than promote development so is unlikely to give rise to a significant demand for mineral resources.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste will be less sustainable as the waste will be, spatially distributed across a wide area. Having said that the policy will restrict rather than promote development so there is not likely to be a significant increase in the amount of waste.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0/+	Given that community facilities are likely to concentrate in rural or larger centres, and the amount of development is small this policy is unlikely to be significant with regard to this Sustainability Objective. The exception is the provision for farm shops which might provide a shop for a small community in circumstances where a shop would otherwise be unviable
14. Maintain and enhance biodiversity both within and outside designated sites	+?-	The impact will depend on the nature of the land prior to development. Developing on improved grassland will probably give rise to biodiversity gains in terms of the garden of the property and any wildlife friendly landscaping required as a planning condition. Conversely a vegetated, unused plot may have significant local biodiversity value that would be difficult to replace in any development.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Any development is likely to require off mains sewerage facilities which carry a greater risk of pollution incidents. Generally the amount of development is likely to be small and dispersed thus placing limited pressure on water resources.

Overall assessment and suggested changes	+	Generally (given the assumption with regard to the wording) this is a policy to restrict rather than facilitate development and as such can be viewed as sustainable in the context of protecting the countryside from development and avoiding development in locations away from facilities and services. However, with the exception of low impact developments (clause h), development that is allowed under this policy is likely to be less sustainable than development in rural or larger centres. The wording of the opening statement, and clause d with regard to buildings unsuitable for conversion needs to be reviewed.
Recommendation	The wording of the opening statement, and clause d with regard to buildings unsuitable for conversion needs to be reviewed.	

Policy 7: NATIONAL PARK PURPOSES AND DUTY (Strategy Policy)

Development within or impacting on the National Park must be compatible with:

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

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.

Recommendation	Not appraised as this policy reflects the National Park's statutory purposes and duty.
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Policy 8: 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) the access to the hazardous installations.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	0	The benefits in avoiding the detrimental impact of development are only likely to occur in areas already significantly blighted by major industrial development.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside	0	The policy is unlikely to prove relevant to this Sustainability Objective.

the peak visitor season.		
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy may preclude some kinds of development requiring minerals, but would not prevent all development, particularly that relating to the hazardous installation.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and	0	Biodiversity might gain from hazardous development if there is a requirement for environmental gain as part of that development, in which case this policy could increase the amount of land available for

outside designated sites		environmentally beneficially uses. However delivering these gains is not part of this policy, so the policy is unlikely to prove relevant to this Sustainability Objective
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+?	The policy may prevent development that would undermine the operation of the installation with regard to environmental protection, making pollution events more likely. Though it is difficult to envisage the circumstances of this kind of development.
Overall assessment and suggested changes	0	The policy is not relevant to the sustainability framework developed for the Local Development Plan. However, it is necessary for public protection.
Recommendation	No change	

Policy 9: SCALE OF GROWTH (Strategy Policy)

To provide for development which aims to meet the needs of the local population with priority being given to the delivery of affordable housing needs where this is compatible with the National Park designation.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Less likely to place pressure on agricultural land or could lead to financial contributions to the farming community.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-	There will still be car journeys generated.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built	++	Directly related to achieving this sustainability objective.

environment and archaeology) with reference to the special qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	Likely to ensure the National Park remains an attractive place to visit. Unlikely to lead to an increase in visitors.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	See above.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+/-	See above for 2. Working with environmental capacity means biodiversity will be protected and flooding avoided.
7. Reduce factors contributing to climate change.	+/-	See above
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+?	Policy option is to aim to meet the needs of local communities within environmental capacity but that capacity will curtail the Authority's ability to do so.
9. Encourage access for all to the National Park, reflecting the social mix of society.	-	All demands cannot be met and therefore there isn't access for all.
10. Maintain the cultural distinctiveness of communities.	+	Providing for local people can enhance local distinctiveness where this is fundamental to the community
11. 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.	-	Inevitably development uses minerals.

12. Reduce the negative impacts of waste.	-	Waste will be generated
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+/-	Providing for the local population is more likely to be supportive of local facilities but less development may mean less money generated through planning contributions.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Working within environmental capacity. <u>The impact of this policy on Natura 2000 sites will depend on the location and scale of proposed development and is best understood through the assessment of Policies 30 & 32.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Working within environmental capacity
Overall assessment and suggested changes	+	<p>Development will result in some negative impact. Agricultural land loss would be tested against national planning policy. The minerals, waste and transport sections look at ways of negating negative impact. The Scale and Location of Growth section looks at directing development to the most sustainable location. Limiting opportunities and not providing for all will raise social inclusion issues. This inevitable given the National Park's statutory purposes.</p> <p>This policy has emerged directly from the option developed for the preferred strategy, and though having the potential for negative effects in some areas is sustainable in the context of a National Park. <u>The implications for this policy on Natura 2000 sites will depend on the location of development and is best understood through the assessment of Policies 30 & 32.</u></p>
Recommendation	No change	

Policy 10: Minerals Safeguarding

Reserves of sand and gravel, limestone and sandstone will be safeguarded as shown 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 environmental impacts.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	May result in minerals extraction occurring on development sites, rather than at locations that would not otherwise be subject to development or quarrying. The requirement to avoid unacceptable impacts may further protect the landscape.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	+	There may be small sustainability benefits if easily extracted, high quality minerals can be extracted before development takes place, rather than extraction taking place at sites where no development or quarrying would otherwise take place
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.

14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	The policy is a requirement of National planning policy. Extracting minerals from land that will be developed anyway can be regarded as a sustainable approach, effectively getting two uses from the same piece of land.
Recommendation	No change to the policy	

Policy 11: 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 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**
- e) the scale of the development is appropriate for the locality; and**
- f) the development will not irretrievably damage the local landscape and local environment; and**
- g) the development will not harm the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor adversely affect existing surface and groundwater resources; and**
- h) any material transported by public highway can be accommodated within the local road network; and**
- i) 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.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	Could provide opportunities for diversification
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. Conserve and enhance	++	Would mean developments used local stone, likely to be more in keeping with the existing character of the

landscapes, townscape and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		area. With careful siting and appropriate conditions on after use borrow pits/ small quarries may become landscape assets. Clause f protects against landscape damage.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	
7. Reduce factors contributing to climate change.	+	Would reduce transport of stone (although this stone is currently only likely to be transported over short distances) and use of less sustainably produced alternative materials.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	?+	Encouraging local craftsmen who are skilled in traditional building practises and therefore employable in the local area.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.	+	The rich diversity of local building stones contributes to the cultural distinctiveness of communities.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential	+	The option proposes a lower impact approach to minerals extraction. Any policy would need to apply the same approaches to after use as for more conventional quarry operations

biodiversity and landscape gains of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	0	<u>The Habitat Regulations Assessment concludes that this policy has no likely significant effect on Natura 2000 sites as the location of any development permitted by the policy is unknown. The habitat regulations implications of the policy can only be assessed at project level.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	<p>A positive balance in respect of SA objectives</p> <p>The policy, though much more detailed, arises directly from the policy option investigated for the Preferred Strategy. The conclusion that that option offered clear sustainability benefits is further strengthened here by clauses e, f and g to ensure that the wider transport gains are not achieved as the expense of the local road network and environment, and clause h which seeks after-use to benefit the landscape. <u>The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.</u></p>
Recommendation	No change to the policy	

Policy 12: 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) 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) the development will not have an unacceptably adverse impact or damage the local landscape and local environment; and**
- f) the development will not harm the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor adversely affect existing surface and groundwater resources; and**
- g) The local road network has the capacity to accommodate the traffic arising from the development; and**
- h) 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.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+?	May provide an opportunity for diversification (an alternative land use) though the opportunity is likely to be short term, and may preclude or disadvantage other types of diversification.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

3. 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	+	Clause c suggests that the policy would allow local quarrying where it represents a landscape benefit (or less harm) compared to meeting the need from existing sites. Clause e should help limit the damage to the landscape, and clause h that the long term effects are positive.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	Is likely to significantly reduce the distance stone is transported to a development site.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The focus of the policy is on small quarries to meet local need, and might be considered beneficial to this Sustainability Objective. However, the Sustainability Objective is concerned about development that meets the needs of communities and as such this policy is outside the scope of the Sustainability Objective. The likely short term nature of the activity allowed by the policy is also likely to minimise the contribution it can make to sustaining a community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	Assuming that many, if not most, of the culturally important buildings in a settlement have been built using locally sourced stone, this policy will help new buildings integrate with these existing buildings, helping maintain the overall character of the settlement
11. The adverse effects of	+	The requirement that activity allowed by this policy will be beneficial or less harmful than meeting the need from

minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains of former minerals sites are realised.		existing sources will help meet this Sustainability Objective. The requirement to avoid unacceptable landscape and environmental impacts, together with the requirement for beneficial after-use and post-closure management, should ensure that landscape and biodiversity are not damaged and in the medium to long term are enhanced.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	+	The requirement for beneficial after-use and post-closure management should yield biodiversity benefits, clause d should ensure that valuable biodiversity is not damaged in the operation of the quarry. <u>The Habitat Regulations Assessment concludes that this policy has no likely significant effect on Natura 2000 sites as the location of any development permitted by the policy is unknown. The habitat regulations implications of the policy can only be assessed at project level.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The requirement that activity does not affect surface and ground water should prevent negative impacts on this Sustainability Objective.
Overall assessment and suggested changes	+	Due to its clauses to avoid environmental damage, the requirement that any sites opened under this policy are less damaging than existing sites or alternative sources, and the requirement for beneficial after-use, the policy is likely to be positive in sustainability terms. <u>The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.</u>
Recommendation	No change to the policy	

Policy 13: 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 adversely affect 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; and
- d) the development will not harm the amenities of the local areas and local communities in particular with regard to access, traffic generated, noise, vibration, dust and safety nor adversely affect existing surface and groundwater resources.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	Sites where this activity could take place may be on farms, and as such provide an opportunity for diversification.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	If the policy results in less primary aggregate extraction, and the removal of unsightly buildings, there will be landscape gains. Clause a should protect buildings of value in the landscape from demolition.
4. Increase the number of	0	The policy is unlikely to prove relevant to this Sustainability Objective.

residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.		
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Could help in making the relocation of activity more sustainable. If a building is vulnerable to flooding is demolished the recycled materials could be used in the construction of a replacement building in a less vulnerable location.
7. Reduce factors contributing to climate change.	?	There will only be benefits for this Sustainability Objective if the energy needed to recycle and transport the demolition material is less than that to quarry and transport new materials.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	Clause a should protect distinctive buildings
11. 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.	+	Could reduce the demand for new minerals in the National Park, though if a large proportion of minerals produced in the park are used outside the Park, then this kind of policy will be needed in those areas if much difference is to be made.
12. Reduce the negative impacts of waste.	+	The materials that would be recycled under this policy would otherwise become waste and need disposal - probably as landfill.
13. Community facilities (including health & social care facilities,	0	The policy is unlikely to prove relevant to this Sustainability Objective.

social facilities and retail provision) continue to meet the needs of the National Park population		
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	The policy facilitates recycling and as such is strongly sustainable. Caveats in the policy should prevent unwanted negative impacts, particularly on nearby communities and the immediate environment, and on the historic environment.
Recommendation	No change to the policy	

Policy 14: Inactive Minerals 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).

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

3. 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	+	Will prevent an increase in quarry activity and ensure that any disused quarries that have become positive elements in the landscape remain so.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. The adverse effects of minerals exploitation in the National Park decline from the	+	Ensures that quarrying does not increase and any environmental benefits in the disused quarry are not lost.

present level and the potential biodiversity and landscape gains of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	+	The policy would ensure that any biodiversity interest in a disused quarry (which may be considerable) is not lost
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	Though this policy does not impact on many of the Sustainability Objectives, for those to which it is relevant it is positive, mainly through ensuring that the landscape and biodiversity value of former quarries is maintained.
Recommendation	No change to the policy	

Policy 15: Local Waste Management Facilities

Local waste management and recycling facilities which serve only 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; or
- b) they are located at existing waste management sites or B2 industrial units; and
- c) the proposal makes provision for adequate screening so as to minimise any adverse effects; and
- d) the development is sufficiently distanced from neighbouring properties so as not to constitute a potential health or safety hazard; and
- e) the development will not cause demonstrable harm to the amenities of the local area and local communities in particular with regard to access, traffic generated, noise, vibration, dust, litter, odour nor adversely affect existing surface and groundwater resources.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	In the absence of a facility allowed by this policy, alternatives are likely to be further away, either resulting in a longer journey for municipal collection vehicles, or a longer journey for the public using civic amenity sites.
3. 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	-	The restriction to serve only the national park area will restrict the scale of any development, and screening would help hide the development, though it is likely that there would still be some negative effect. The clause to protect amenity will reduce the impact of noise and smell, etc, but again it is unlikely that this will be eliminated completely.
4. Increase the number of residents and visitors taking part	0	The policy is unlikely to prove relevant to this Sustainability Objective.

in physical forms of recreation (especially walking and cycling) and volunteering opportunities.		
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	There requirement for a safe distance to neighbouring property should help avoid any health consequences.
7. Reduce factors contributing to climate change.	+	If car and lorry journeys are shorter than less greenhouse gas will be produced transporting waste.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	Though the waste facility may serve the local community, it is unlikely that it will be significant in sustaining that community
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	+	If a nearby public tip prevents fly-tipping then it will benefit this Sustainability Objective. Recycling facilities on the site may promote recycling, or expand the range of waste that can be recycled.
13. Community facilities (including health & social care facilities, social facilities and retail	+	Will help ensure that if current waste facilities are no longer adequate then improved facilities that meet the need can be provided.

provision) continue to meet the needs of the National Park population		
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0?+	Waste facilities are potential sources of pollution, though they are likely to be well regulated. The new facilities covered by this policy are likely to represent a lower risk of pollution incidents than older sites as the design is more likely to have taken such risk into account, the site is less likely to be over-burdened, and the fabric of site structures will be newer.
Overall assessment and suggested changes	+	The most sustainable solution to waste will be to avoid generating waste in the first place ('reduce and re-use'). Given that waste has to be dealt with, the policy offers a relatively sustainable solution in that it attempts to minimise the negative impacts and will hopefully result in facilities located closer to where people need them.
Recommendation	No change to the policy	

Policy 16: Composting

Proposals that involve the composting of organic material, generated within the National Park will be permitted unless there would be an unacceptable impact 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.
- c) there is provision for landscaping and/or screening of the site; and
- d) there are adequate steps to deal with leachate; and
- e) the product has added value.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+?	Farms near settlements could be ideal sites for this kind of development, and it could provide opportunity for diversification. Having said that, a facility dealing only with material generated in the Park is likely to be of the small scale, community type and is unlikely to represent a significant commercial venture. There might be opportunities for farms to provide land for rent.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-?+	If facilities are small and local then the journeys to them might be shorter than to the local tip where such waste might already be taken to. Conversely households who are already composting in their gardens may change to taking their compostable waste to community sites by car (the community site is likely to create better compost more efficiently than most people can in their gardens).
3. Conserve and enhance landscapes, townscape and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park	0	Large scale facilities are likely to have negative landscape impacts even with conditions for screening and protecting amenity, but such developments are unlikely given that the policy precludes sourcing waste from a wide area. Small community schemes are unlikely to have considerably less impact than the paraphernalia of modern farming (e.g. silage clamps).
4. Increase the number of residents and visitors taking part in physical forms of recreation	0	The policy is unlikely to prove relevant to this Sustainability Objective.

(especially walking and cycling) and volunteering opportunities.		
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Soils lose organic material at a faster rate as they warm, therefore a warmer climate will require greater replacement of organic material in the soil in the form of domestic compost, manure, or peat or other commercial/bagged composts. Given that domestic compost is amongst the most sustainable of these increasing the availability and quality of such compost will address this problem of climate change in a sustainable way.
7. Reduce factors contributing to climate change.	++	A good compost heap will produce carbon dioxide as a product of the aerobic respiration involved in the decay process. However, a bad compost heap, or organic material in a land fill will decay anaerobically producing methane, a more potent greenhouse gas. Compost will also be used while much of the carbon it contains is still within it. In short producing compost in a healthy compost heap is a good way of slowing the rate at which the carbon contained in dead organic material is returned to the atmosphere. Commercial or community composting schemes are more likely to be good compost heaps than those in a garden due to the more rapid turnover of more material, the ability to use machinery to turn and aerate the compost, and the human attention that can be paid to the process. Effective composting is likely to prove highly sustainable in terms of this sustainability objective, the only question mark relates to the potential for car use.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains	0	The policy is unlikely to prove relevant to this Sustainability Objective.

of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	++	Encouraging people to compost suitable waste or creating facilities to compost suitable waste in the general waste stream will reduce the waste sent to landfill, and recycle the waste into a useful product.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	Even though the policy could create a community facility the policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	++	Healthy compost heaps are characterised by a large number and variety of invertebrates and are also likely to be used by larger animals as a place to shelter or find food. As long as the management of the composting facility tries to avoid harm to such fauna the composting process itself can provide biodiversity benefits. Biodiversity is also likely to benefit when the compost is used as it will improve the soil condition supporting more soil flora and fauna and all animals and plants that depend on that.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0/+	Leachate could lead to eutrophication of water bodies, but the policy contains a clause to prevent this, and an effective composting process would aim to avoid this as it would represent a loss of nutrient value in the finished compost.
Overall assessment and suggested changes	++	Composting in community or larger facilities is likely to represent a strongly sustainable way of dealing with suitable waste.
Recommendation	No change to the policy	

Policy 17: 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 45)
- b) Environment and biodiversity (see Policy 45)
- c) Community cohesion and health (see Policy 18)
- d) Accessibility (see Policy 40)
- e) Energy use
- f) Energy generation (see Policy 22)
- g) Materials and resources (see Policy 19)
- h) Water and drainage (see Policy 20)
- i) Waste (see Policy 19)
- j) Resilience to climate change

Where planning applications are made to extend buildings energy, water and drainage efficiency improvements will be sought in the original building as well as in the extension where appropriate and practicable.

Within the Brynhir, Tenby, and Glasfryn, St. Davids development sites new development should incorporate on-site and/or near-site and renewable or low-carbon energy technologies contributing at least an additional 20% in regulated CO2 emissions (20% reduction of the Target Emission Rate). Developers will be expected to demonstrate that they have explored all energy options, and designed their schemes to incorporate these requirements.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	Though there may have cost implications for any redevelopment of farm buildings needed to support the existing business or any diversification, it is likely that the resulting buildings would be cheaper to run, and be landscape assets, rather than detrimental factors in the landscape
2. Decrease the length and number of journeys made by private car to and within the	+?	If the requirement for accessibility includes accessibility by means other than cars, or will mean that any resulting car journeys are shorter or less frequent than they would otherwise have been, then the policy will

National Park by both residents and visitors.		be positive with regard to this Sustainability Objective.
3. 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	++	The definition of good design that has regard to place and local distinctiveness, environment and biodiversity means this policy is likely to enhance landscapes and townscapes.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	The inclusion water and drainage, and resilience to climate change as considerations for good design should ensure new development that copes well in a changing climate and does not exacerbate problems for existing development.
7. Reduce factors contributing to climate change.	++	The definition of good design includes energy efficiency and the need to generate electricity by low carbon or carbon neutral methods. The inclusion of a requirement for proposals to extend existing buildings to also improve the performance of the existing structure will help this policy impact on the existing building stock.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	?	The policy may have cost implications which may make it more difficult for local people to take advantage of development opportunities, though these may be offset by subsequent savings in the running cost of a building. Having said that, economic feasibility modelling of housing allocation sites strongly suggest it is possible to provide a high percentage of affordable housing and meet environmental standards equivalent to Ecohomes 'Excellent', or Code for Sustainable Homes level 3. The requirement to improve existing property when extending it may make it more difficult for some households to adapt their existing housing to meet changing needs, though this will depend on the nature of improvements required and be offset by subsequent savings.
9. Encourage access for all to the National Park, reflecting the social	0	The policy is unlikely to prove relevant to this Sustainability Objective.

mix of society.		
10. Maintain the cultural distinctiveness of communities.	+	The requirement for design that considers place and local distinctiveness will help achieve this Sustainability Objective .
11. 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.	+	The policy requires that resource use and waste generation is minimised during construction, in part through more efficient use and recycling of mineral resources. This should reduce the demand for primary minerals.
12. Reduce the negative impacts of waste.	+	The definition of good design involves measures to minimise waste generation during construction and once the building is in use, and facilities to deal with waste in sustainable ways (e.g. recycling and composting).
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0?	Development of community facilities would be subject to this policy which may have cost implications, though these would be offset by subsequent lower running cost for the facility.
14. Maintain and enhance biodiversity both within and outside designated sites	+	The policy defines good design as that of benefit to biodiversity. Additionally the impact of measures to reduce factors contributing to climate change are likely to indirectly benefit biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	The definition of good design includes reference to efficient use of water and effective drainage provision, both likely to benefit this Sustainability Objective.
Overall assessment and suggested changes	+	This policy develops earlier policy options to require more resource efficient buildings, options that were regarded as sustainable during the appraisal of the preferred strategy. The addition of clauses to consider the benefits to environment, biodiversity, place and distinctiveness, community, accessibility, and renewable energy further strengthen the sustainability of this policy. This policy also reflects emerging National policy and aspirations.
Recommendation	No change	

Policy 18: Amenity

Development will only be permitted where it does not have an unacceptable impact on amenity, particularly where:

- a) the development is for a use inappropriate for 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 which has a significant adverse impact; and/or**
- d) the development is visually intrusive.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	This might prevent some farm diversification projects, but is more likely to protect the environment for other, more common, kinds of diversification such as recreation related schemes or farm shops.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	The type of development prevented by the policy is almost certain to have a significant negative impact on landscapes and townscapes
4. Increase the number of residents and visitors taking part in physical forms of recreation	+	People are unlikely to want to undertake physical (or any other kind of) recreation in an area where amenity has been damaged.

(especially walking and cycling) and volunteering opportunities.		
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	Some of the types of development prevented by this policy could be industrial in nature or give rise to significant traffic increases, which would increase emissions of greenhouse gases
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The effects of this policy will probably be neutral with regard to this Sustainability Objective. The developments that might be prevented could be those that don't serve the community, thus making the site available for development that does, or it could be the kind of development a community needs.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+?	Unless there is a local tradition of the kind of activity that would be prevented by this policy, the policy is likely to prevent development that would change the character of a community.
11. 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.	+	The policy could provide justification to refuse permission for new, or extensions to, quarries.
12. Reduce the negative impacts of waste.	0	Facilities to deal with waste might be refused using this policy, though the effect would probably only be to move the problem elsewhere.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the	0	It is unlikely that development required to provide or maintain community facilities would be prevented by this policy.

needs of the National Park population		
14. Maintain and enhance biodiversity both within and outside designated sites	+?	Though aimed at preventing unacceptable disturbance to people, this policy <u>may also is also likely to prevent development that would cause harmful disturbance to wildlife. However, the uncertainty in the outcome reflects that some measures to protect amenity may involve management decisions detrimental to biodiversity. Policies to protect biodiversity and the special qualities of the National Park should prevent these management approaches.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	The policy is appropriate in sustainability terms, particularly in the context of the first National park purpose.
Recommendation	No change	

Policy 19: 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.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	Though the policy may place requirements on developments on farms it is unlikely that such requirements would affect the Sustainability Objective one way or the other.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

3. 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	+	If the re-using and recycling of waste leads to less demand for minerals this would have landscape benefits. Less waste would mean fewer landscape impacts associated with its disposal either in the National Park or elsewhere.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	?	Much of the waste associated with development is likely to be inert (or have a very long half-life) and as such is unlikely to yield significant amounts of greenhouse gases. Waste generated when the development is in use may have more potential for greenhouse gas generation (a high proportion of organic material) but this gas will probably be released whether the waste is dealt with on site (for example through community composting schemes) or taken away for disposal elsewhere. It is even possible that greenhouse gas emissions could be reduced if this material is dealt with at a site where gases released through decay (e.g. methane) can be captured and used to generate energy.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective, though shared community waste management facilities may provide a focus for interaction between members of a community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	+	The policy aims to increase the efficiency of use of building material, including mineral products, and is therefore likely to reduce the demand for these products.
12. Reduce the negative impacts of waste.	+	The policy should result in less waste, and better handling of the waste that does arise.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	Though the policy could add new types of community facilities (waste facilities) it is unlikely to have any affect with regard to the spirit of this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	?	If the waste impacts this policy seeks to avoid were to affect sites of biodiversity value then the policy is positive with regard to this objective. However, waste tips can provide significant food resources for some species (e.g. gulls and corvids), and if less household waste is disposed of in this way this resource will be smaller.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	?	Large waste facilities may present a risk to water bodies in terms of leachate and runoff, but the same is true for smaller facilities, and these may be more difficult to control.
Overall assessment and suggested changes	+	Generally steps to minimise waste and deal with it locally are likely to deliver sustainability gains, however the effect of dealing with waste locally could be simply to spread the negative effects more thinly if local waste management is not controlled as effectively as a larger scale facility would be.
Recommendation	No change to the policy	

Policy 20: Surface Water Drainage**Development will be required to incorporate sustainable drainage systems for the disposal of surface waters on site.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	Sustainable drainage systems may help to prevent flood damage to the historic built environment and archaeological sites.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	If a consequence of climate change is more extreme rainfall events then effective management of flood waters will be important in reducing or preventing the consequences of this.

7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Flood waters often lead to pollution events harmful to biological systems, either as a direct consequence of runoff, or by causing over flows and releases of untreated sewage at sewage works. Effective management of surface water should help prevent this.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Flood waters often lead to pollution events in freshwater and marine environments, either as a direct consequence of runoff, or by causing over flows and releases of untreated sewage at sewage works. Effective management of surface water should help prevent this.

Overall assessment and suggested changes	+	The policy will have positive sustainability outcomes by helping prevent flooding and pollution
Recommendation	No change to the policy	

Policy 21: RENEWABLE ENERGY (Strategy Policy)

Small scale renewable energy schemes will be considered favourably, subject to there being no over-riding environmental and amenity considerations. 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 over-riding environmental and amenity considerations. 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 45i) with the least obtrusive approach to design being taken.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Small scale renewable schemes may contribute to farm incomes, either through the sale of energy or through generation of energy to be used in the business. Larger schemes could also create revenue in terms of site rents from the operator. Renewable energy will provide a market for forestry products though this may promote the planting of non-native trees, or forestry practices of limited value to the landscape or biodiversity
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. Conserve and enhance landscapes, townscapes and	?	The requirement to consider environmental impacts of schemes and consider the impact of large scale schemes on the Special Qualities of the National Park should protect the landscape. Where the scheme

seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		involves biofuels there may be negative impacts due to crop monoculture, or the promotion of conifer forestry. Conversely renewable energy may provide a market for native wood products, and traditional woodland management. The policy has potential to allow development on undeveloped coast
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+?	Climate change may result in fossil fuel energy becoming more expensive, or restricted in availability by government policy, renewable energy schemes will be an important tool for addressing this. That said, as the demand for renewable energy increases, certain forms of renewable energy (e.g. biofuels) are also likely to increase in price.
7. Reduce factors contributing to climate change.	+	Renewable energy encompasses technologies to meet energy needs without contributing to climate change. The policy allows such development as so will contribute to this Sustainability Objective. The largest schemes may be precluded as they are likely to compromise the Special Qualities of the National Park.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Off grid community renewable energy schemes could benefit communities by providing a degree of energy security.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	Community based schemes could help to generate community unity and maintain distinctiveness
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential	0	The policy is unlikely to prove relevant to this Sustainability Objective.

biodiversity and landscape gains of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	+/-	Opportunities to enhance biodiversity may arise from schemes where access is restricted and disturbance minimised. There is also potential for schemes, such as hydro power to negatively impact on ecology. <u>The supporting text for the policy states that environmental considerations include the impact on Natura 2000 sites, so the policy is not likely to have a significant effect on any Natura 2000 site.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	Renewable energy schemes are for the most part likely to contribute significantly to a more sustainable society. In a National Park the impact of any renewable energy scheme on the landscape and other Special Qualities of the National Park must be a consideration, and therefore this policy makes less likely the large scale developments that might generate significant amounts of renewable energy. This policy represents the tension between being sustainable in the sense of reducing carbon footprints, and being sustainable in the sense of protecting for future generations those areas regarded as special due to their high quality landscape. As such it attempts to strike an appropriate balance. <u>The environmental protection contained in the policy should ensure no adverse effects on Natura 2000 sites.</u>
Recommendation	No change to the policy	

Policy 22: FLOODING & 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 the Environment Agency LIDAR or Shoreline Management Plan 2 unless there are sound social or economic justifications in accordance with the advice set out in Technical Advice Note 15.
- b) sustainable defence of the coast will be permitted to protect existing communities or assets where practicable and where they do not jeopardise the longer term and natural evolution of the coast.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-?	Loss of coastal roads most notably at Newgale could possibly result in longer detours, on what are currently minor roads unsuitable for increased traffic volumes. Many minor roads in the area are also part of the National Cycle Network, and increased motor vehicle traffic on them may discourage cycling.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology)	-?+	Given that development generally has a negative landscape impact (see work by Steinitz, 1990 ¹ , and Scott, 2002 ² , amongst others), any policy approach that results in less development is likely to have a positive landscape effect. Any short term defence that is effective is likely to have a negative landscape impact, either directly or through the interruption of natural processes. In the short term, this approach may 'buy time' for the

¹ Steinitz C. (1990) Toward a Sustainable Landscape with High Visual Preference and High Ecological Integrity: the Loop Road in Acadia National Park, U.S.A. Landscape and Urban Planning 19(3), 213-250.

² Scott A. (2002) Assessing Public Perception of Landscape: the LANDMAP experience. Landscape Research 27(3), 271-295

with reference to the special qualities of the National Park		recording of, and research into, historic sites threatened by coastal erosion, allowing at least some measure of the preservation of the archaeological landscape component. It would also allow people to get used to the idea that certain sites and places will not last forever.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	?+	Where coastal assets are involved in physical recreation, their defence will have a positive impact for this Sustainability Objective, though by not maintaining the defence the long term effect will be negative. Long term management strategies of assets such as the coast path will ensure continuation of the route, albeit potentially further inland than its current position.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	<p>a). Avoiding vulnerable development in areas at risk of inundation by the sea is likely to be the major way the risk of flooding due to climate change is managed in the National Park. In assessing what is appropriate where, the lifespan of a development will need to be considered. Predictions for sea level rise cover events over several thousand years. The 4th assessment report of the IPCC presents as a 'worst case' sea level rise of around 0.8 metres by 2080. It is not unlikely that this is a conservative prediction, wider recent debate in the scientific community (see Risbey, 2008, for an overview) suggests that increases may be greater. Larger rises of over ten metres are also likely in the longer term unless global temperature increases are controlled. Again there is much debate over timescales, the IPCC sees such changes as occurring over millennia, whereas other respected scientists consider it possible that the changes could occur over a few hundred years.</p> <p>b). This is a direct approach to managing the increased risk of coastal flooding acknowledging that it is unlikely that all areas currently defended will continue indefinitely. A long-term strategy which understands and manages change over time will help to minimise the impacts of inundation by the sea.</p>
7. Reduce factors contributing to climate change.	+	<p>a). If the development that is restricted would otherwise need concrete/ cement defensive works.</p> <p>b). Assessment assumes that '<i>sustainable</i>' means no concrete</p>
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+?	Sustaining local communities might depend on protecting key assets. Though the policy implies that this may not happen in all cases
9. Encourage access for all to the National Park, reflecting the social	0	

mix of society.		
10. Maintain the cultural distinctiveness of communities.	+?	Maintaining cultural distinctiveness might depend on protecting key assets. Though the policy implies that this may not happen in all cases. If standard defence constructions are used across the county this could diminish local distinctiveness
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+?	Protecting community facilities would help realise this Sustainability Objective. Though the policy implies that this may not happen in all cases.
14. Maintain and enhance biodiversity both within and outside designated sites	++?	a). Inundation by the sea is likely to create new wetland/ littoral habitats. Restrictions on development and allowing inundation to occur is likely to yield biodiversity benefits providing the existing habitat is not of greater value. b). A long term management approach of natural evolution is likely to yield soft flood defences (e.g. marsh or dune) of potentially high biodiversity value. Though this would be delayed by any short term measures undertaken <u>The supporting text for the policy states that environmental considerations include the impact on Natura 2000 sites, so the policy is not likely to have a significant effect on any Natura 2000 site.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	

Overall assessment and suggested changes	+?	<p>a). The lifespan of any development may need to be considered, to take into account the effects of global warming. Current scenarios for sea-level rise by the end of the 21st century range from 0.20 metres to around 2 metres. Greater rises in sea level, of 7 metres or more could take millennia according to some predictions, or as little as a few hundred years.</p> <p>b). This clause seems to imply that measures would be undertaken to protect the coast under certain circumstances certain places, the sustainability outcomes of which would be mixed (though sustainability would be a factor in deciding whether protection is appropriate). Over the long term nature would be allowed to take its course and soft flood defences may emerge, though again there would be a mixed outcome in sustainability terms, potentially a reverse of the short term outcomes. This policy has developed from options that have been assessed as broadly sustainable though there is a great deal of uncertainty in this area particularly with regard to the rate and extent of sea level rise.</p> <p>The wording 'Environment Agency LIDAR' should be changed to 'Environment Agency modelling'. LIDAR is a technique for measurement not prediction, the LIDAR measurements provide inputs to flooding models. <u>The supporting text considering impact on Natura 2000 sites will be important in ensuring no adverse impact on Natura 2000 sites.</u></p>
Recommendation	Change wording regarding LIDAR and flood modelling	

Policy 23: VISITOR ECONOMY (Strategy Policy)

To attract visitors outside the peak season while ensuring that National Park environment continues to hold its attraction as a landscape of national and international importance by:

- a) Not allowing any additional camping, caravanning or chalet pitches but allowing change over to other forms of self catering where the site lies within a Centre and the scheme results in environmental benefits in terms of layout, design and materials used. (See Policy 26 and Policy 27)
- b) Protecting against the loss of hotels and guesthouses 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 24)
- c) Only permitting self catering accommodation on brownfield sites in the Local Development Plan's Centres and in conversions in the countryside except where an affordable housing need has been identified. Affordable housing provision will be given priority over self catering where such a need is identified. (See Policy 25)
- d) Permitting visitor attractions, recreational and leisure activities in the Local Service and Tourism Centre and the Local Centres. Proposals outside these Centres will need to demonstrate why a 'Rural Centre' or 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.
- e) Directing shore based facilities to the developed stretches of coast where compatible with adjacent uses. (See Policy 52).

Activities which would damage the special qualities of the National Park will not be permitted. – see also Policy 45.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	++	d). This clause allows attractions in the most accessible locations, with a need to demonstrate a reason to be elsewhere. e). The development of such facilities within settlements will help to minimise the need to travel by car as these are likely to be more accessible by other means of transport. Also they offer multi-purpose trips.
3. Conserve and enhance	++	a). Camping, caravanning and chalet sites are frequently acknowledged as having a negative impact on the

landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		<p>landscape. This policy would prevent any further impact occurring. This clause seeks to enhance the landscape by allowing upgrading of pitches, provided numbers of units are rationalised and environmental benefits result. This would include impact on the landscape. The clause would allow for such developments only within settlements where there would be an opportunity to use design to allow the buildings be in character with surrounding buildings.</p> <p>b). Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve the townscape provided that the buildings are retained. Those with an unviable future would be redeveloped or reused thus also protecting the townscape.</p> <p>c). There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. Developable land in the National Park is scarce and development of further purpose-built self catering accommodation will reduce the supply further. This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or dilapidated buildings or sites.</p> <p>d). This clause encourages attractions in the largest settlements with a need to demonstrate a reason to be elsewhere. These are the settlements most likely to be able to absorb such developments</p> <p>e). This clause protects undeveloped stretches of the coast and therefore meets this criterion.</p>
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	<p>d). Encouraging attractions in the largest settlements will encourage multi-purpose trips or walking and cycling directly from accommodation</p> <p>e). Development of shore based facilities may allow for increased activity. Their location within settlements will allow access by means other than car in some cases.</p>
5. Increase the number of visitors using the National Park outside the peak visitor season.	+/-	<p>a). Camping and caravanning surveys conducted annually by the National Park Authority until 1998 and updated using aerial photographs in 2000 highlighted a large oversupply of pitches for camping and caravanning. This is backed with Welsh Tourist Board statistics showing a 66% occupancy rate even in the peak season. This sector of the market does tend to be seasonal, although with improvements in caravan accommodation it is likely to become less so. However, many sites have conditions to prevent occupancy in the winter months. This clause would allow conversion of some caravan or camping pitches to more permanent accommodation which is likely to be more appropriate for year-round use.</p> <p>b). Good quality serviced accommodation is acknowledged to be best placed to provide for year-round visitor accommodation. This option protects all serviced accommodation and therefore has the potential to assist with this criterion. Unlike the previous option this one protects serviced accommodation with a viable future which is more likely to be of a good quality.</p>

		<p>c). This policy allows for some development of self-catering properties using windfall sites and may allow for a greater increase purpose-built letting properties.</p> <p>e). Development of shore based facilities may enhance attractions on offer to visitors and hence attract more visitors. Marine activities, however are highly seasonal and therefore this sector is not best placed to encourage a lengthening of the season.</p>
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	?	<p>a). Camping and caravanning sites are frequently green field sites. Upgrading to more permanent accommodation is likely to increase hard surfaces and therefore affect the rate of surface run-off. Without attenuation this may have an impact on flooding in some cases.</p> <p>c). As this clause uses brownfield land it is likely to minimise the risk of flooding and impact on biodiversity, although appropriate policies will ensure the appropriate approaches are taken, eg. protection of species in derelict buildings.</p> <p>d). The most significant element is flooding, this can only be judged on a specific site basis</p>
7. Reduce factors contributing to climate change.	+/-	<p>a & c). potential negative effect if the resulting development would need concrete/ cement.</p> <p>d). Attractions within settlements are likely to reduce the need to travel by private car.</p>
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	<p>a). An increase in these facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops. However only about two-thirds of existing pitches are occupied and proposals for new sites are likely to arise from areas already saturated with caravan sites and therefore their contribution to sustaining local facilities limited. It is also the case that caravanning and camping is highly seasonal. Upgrading to more permanent accommodation, particularly in settlements is likely to allow it to be used for a longer period of the year and there is therefore potential for visitors to help sustain local facilities and services for a longer period</p> <p>c). An increase in visitor facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops. Where the need for housing is more important this will be given priority</p> <p>b). Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities</p> <p>d). Encouraging attractions in settlements will help to sustain employment opportunities.</p>
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	<p>a). Does not provide opportunities for additional visitors in this accommodation sector, but as there is a surplus of accommodation in this sector there is a neutral result. May allow some of the surplus caravan and camping sites to be used for alternative visitor accommodation and therefore increase provision of self-catering accommodation.</p>

		<p>c). May allow greater provision of self-catering accommodation</p> <p>b). Has the potential to ensure accommodation is provided for a range of budgets.</p>
10. Maintain the cultural distinctiveness of communities.		<p>a). Whilst camping and caravanning is an integral element of the culture of many of the National Park communities there is an over-supply of this accommodation. Demand for further sites is likely to arise in areas already saturated with provision which is likely to harm cultural distinctiveness. This clause provides an opportunity to use design to allow buildings be in character with surrounding buildings.</p> <p>b). Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve that culture.</p> <p>c). This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or dilapidated buildings or sites. This may result in a negative effect if iconic buildings are removed, but has the potential to allow redevelopments to add to the cultural distinctiveness of a community with careful design. Buildings in the countryside are usually redundant agricultural buildings and so their use for self-catering accommodation would result in a distinct change to the local culture. Prioritising housing if there is local need will help maintain communities.</p> <p>d). This option encourages attractions in the largest settlements with a need to demonstrate a reason to be elsewhere. These are the settlements most likely to be able to absorb such developments</p>
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and	0	<p>a). The clause maintains the status quo in terms of numbers of camping/caravan pitches but there may be an impact on biodiversity as temporary structures are replaced with permanent structures.</p>

outside designated sites		<p>b). Loss of some buildings may affect certain species, but appropriate policies would ensure they are provided for in new developments.</p> <p>c). By using brownfield sites this should minimise the impact on biodiversity, although some species may require appropriate policies to ensure their protection.</p> <p>d). Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity, where possible.</p> <p>e). Appropriate protection of biodiversity policies will ensure that sites are located to minimise the impacts on biodiversity, where possible.</p>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	<p>a). Avoids any increase in the negative landscape effects of such sites. Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism.</p> <p>b). Least likely (of the options considered) to result in the loss of serviced accommodation, with attendant negative effects</p> <p>c). Avoids the landscape impacts of allowing new build / green field self catering development. Improving visitors facilities may help support local facilities, but prioritising affordable housing where needed ensures that is not at the expense of housing people.</p> <p>d) Directs developments towards larger centres where employment opportunities can be maximised and travel problems minimised.</p> <p>e). Protects the undeveloped coast from development and maintains the character of coastal settlements</p>
Recommendation	No change to the policy	

Policy 24: 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 un-viable; 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 adverse effect on the appeal and intrinsic character of the resort, area or frontage.**

SA Objective	Sum- mary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. 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	++	Hotels and guest houses contribute an important element to the townscape in some instances, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve the townscape provided that the buildings are retained. Those with an unviable future would be redeveloped or reused thus also protecting the townscape.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside	++	Good quality serviced accommodation is acknowledged to be best placed to provide for year-round visitor accommodation. This option protects all serviced accommodation and therefore has the potential to assist

the peak visitor season.		with this criterion. Unlike the previous option this one protects serviced accommodation with a viable future which is more likely to be of a good quality.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	
7. Reduce factors contributing to climate change.	0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Serviced accommodation not only provides direct employment opportunities but also is important beyond the parameters of the serviced accommodation trade itself. There is also the aspect of other facilities often provided by serviced accommodation premises such as a public house or restaurant and in some cases fitness or leisure facilities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	Has the potential to ensure accommodation is provided for a range of budgets.
10. Maintain the cultural distinctiveness of communities.	++	Hotels and guest houses contribute an important element to the culture of some communities in the National Park, particularly in the resorts of Tenby and Saundersfoot. This policy option helps to conserve that culture.
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	

14. Maintain and enhance biodiversity both within and outside designated sites	-/+	Loss of some buildings may affect certain species, but appropriate policies would ensure they are provided for in new developments.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	Option least likely to result in the loss of serviced accommodation, with attendant negative effects
Recommendation	No change to the policy	

Policy 25: Self-Catering Development

Proposals for holiday cottages, flats and other forms of self-catering development will only be permitted where:

- a) the proposal is on a brownfield site in a Centre or is a conversion proposal in a countryside location (see Policy 6) or is the result of a changeover from camping/caravanning to self catering accommodation in Centres (see Policy 33), and**
- b) there is no need for affordable housing provision in the area or**
- c) the site or building is not appropriate for affordable housing provision.**

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

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and	0	

number of journeys made by private car to and within the National Park by both residents and visitors.		
3. 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	++	There are a significant number of residential properties in the National Park used and advertised for self-catering accommodation. Some second homes are also let for holiday use on a casual basis. Planning permission is not needed to convert a permanent residence to either a second home or a holiday letting property and so there is potential for continued expansion of this sector. Developable land in the National Park is scarce and development of further purpose-built self catering accommodation will reduce the supply further. This allows limited new self-catering developments through development of windfall sites which would help to enhance derelict or dilapidated buildings or sites.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.		
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	This policy allows for some development of self-catering properties using windfall sites and may allow for a greater increase purpose-built letting properties.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	As this option uses brownfield land it is likely to minimise the risk of flooding and impact on biodiversity, although appropriate policies will ensure the appropriate approaches are taken, eg. protection of species in derelict buildings.
7. Reduce factors contributing to climate change.	-	If the resulting development would need concrete/ cement.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	An increase in visitor facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops. Where the need for housing is more important this will be given priority.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	May allow greater provision of self-catering accommodation.
10. Maintain the cultural	+	This allows limited new self-catering developments through development of windfall sites which would help

distinctiveness of communities.		to enhance derelict or dilapidated buildings or sites. This may result in a negative effect if iconic buildings are removed, but has the potential to allow redevelopments to add to the cultural distinctiveness of a community with careful design. Buildings in the countryside are usually redundant agricultural buildings and so their use for self-catering accommodation would result in a distinct change to the local culture. Prioritising housing if there is local need will help maintain communities.
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	+	By using brownfield sites this should minimise the impact on biodiversity, although some species may require appropriate policies to ensure their protection.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	++	Avoids the landscape impacts of allowing new build / green field self catering development. Improving visitors facilities may help support local facilities, but prioritising affordable housing where needed ensures that is not at the expense of housing people.
Recommendation	No change to the policy	

Policy 26: Camping, Touring Caravans, Statics and Chalet Sites

New camping, caravanning, static caravan or chalet sites or the extension of existing sites either by an increase in the number of pitches or enlargement of the approved site area will not be permitted.

Exceptionally, static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. 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	++	Camping, caravanning and chalet sites are frequently acknowledged as having a negative impact on the landscape. This policy would prevent any further impact occurring.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors	+/-	Camping and caravanning surveys conducted annually by the National Park Authority until 1998 and

using the National Park outside the peak visitor season.		updated using aerial photographs in 2000 highlighted a large oversupply of pitches for camping and caravanning. This is backed with Welsh Tourist Board statistics showing a 66% occupancy rate even in the peak season. This sector of the market does tend to be seasonal, although with improvements in caravan accommodation it is likely to become less so. However, many sites have conditions to prevent occupancy in the winter months.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	
7. Reduce factors contributing to climate change.	0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	An increase in these facilities may attract greater numbers of visitors who may contribute towards retaining locally-provided services such as village shops. However only about two-thirds of existing pitches are occupied and proposals for new sites are likely to arise from areas already saturated with caravan sites and therefore their contribution to sustaining local facilities limited. It is also the case that caravanning and camping is highly seasonal.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+/-	Does not provide opportunities for additional visitors in this accommodation sector, but as there is a surplus of accommodation in this sector there is a neutral result.
10. Maintain the cultural distinctiveness of communities.	+	Whilst camping and caravanning is an integral element of the culture of many of the National Park communities there is an over-supply of this accommodation. Demand for further sites is likely to arise in areas already saturated with provision which is likely to harm cultural distinctiveness.
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities,	0	

social facilities and retail provision) continue to meet the needs of the National Park population		
14. Maintain and enhance biodiversity both within and outside designated sites	-/+	This maintains the status quo.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	Avoids any increase in the negative landscape effects of such sites. This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable. The clause regarding enlargement of sites will further improve landscape benefits as it only applies in order to improve the setting of the site.
Recommendation	No change to the policy	

Policy 27: Upgrading Statics, Touring Sites and Tent Pitches

The upgrading of static caravan sites, touring caravan or tent pitches, to other forms of self-catering accommodation will be permitted, where:

- a) the site lies within a Centre; and
- b) the proposal forms part of a rationalisation scheme that will result in environmental benefits in terms of layout, design and materials used; and
- c) the proposal complies with Policy 23c.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are	0	

contributing to conserving and enhancing landscape, biodiversity and community well being.		
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. 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	++	This policy option seeks to enhance the landscape by allowing upgrading of pitches, provided numbers of units are rationalised and environmental benefits result. This would include impact on the landscape. The option would allow for such developments only within settlements where there would be an opportunity to use design to allow the buildings be in character with surrounding buildings.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	++	This option would allow conversion of some caravan or camping pitches to more permanent accommodation which is likely to be more appropriate for year-round use.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	-	Camping and caravanning sites are frequently green field sites. Upgrading to more permanent accommodation is likely to increase hard surfaces and therefore affect the rate of surface run-off. Without attenuation this may have an impact on flooding in some cases.
7. Reduce factors contributing to climate change.	-	If the resulting development would need concrete/ cement.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	Upgrading to more permanent accommodation, particularly in settlements is likely to allow it to be used for a longer period of the year and there is therefore potential for visitors to help sustain local facilities and services for a longer period.

9. Encourage access for all to the National Park, reflecting the social mix of society.	+	May allow some of the surplus caravan and camping sites to be used for alternative visitor accommodation and therefore increase provision of self-catering accommodation.
10. Maintain the cultural distinctiveness of communities.	+	This option provides an opportunity to use design to allow buildings be in character with surrounding buildings.
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	-	This is likely to impact on biodiversity as temporary structures are replaced with permanent structures.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	

Overall assessment and suggested changes	+	Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism. This policy arises directly from the option investigated for the Preferred Strategy and found at that time to be sustainable. Policy 12 is referred to which is itself regarded as sustainable.
Recommendation	No change to the policy	

Policy 28: Site Facilities on Tent, Chalet and Caravan Sites

The development of retail and other facilities on tent, 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**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	May help in attempts to diversify farms into providing tourist facilities, may also provide means to add to the value a farm might get from such diversification
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	The policy could mean that site users do not have to travel by car to buy basic provisions if there is a shop on site
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology) with reference to the special	0	The requirement for development in keeping with the character of the surrounding area should ensure negative landscape impact is minimised

qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	If car travel is reduced then a significant factor in climate change will also be reduced
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts	0	The policy is unlikely to prove relevant to this Sustainability Objective.

of waste.		
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+?	May provide a local facility, at least during part of the year, where there would otherwise be no such facility. Clause b will prevent any site facility undermining the viability of existing facilities.
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	0/+	The policy is unlikely to have a major impact on the Sustainability Objectives other than reducing the need for site users to travel, if the facility provided is a small shop.
Recommendation	No change to the policy	

Policy 29: Change of Use from Tent Pitches to Touring Caravan Pitches

Changes of tent pitches that have a valid planning permission, or a lawful use, to "unit" pitches (tent, motor caravan and touring vans) will be permitted where:

- a) there is no increase in the number of pitches; and**
- b) the approved site area is not enlarged; and**
- c) an overall enhancement of appearance results; and**
- d) at least one third of the total number of pitches remains exclusively for tents.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	May increase the potential revenue from and existing tent site on a farm.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	The requirement for enhancement will ensure landscape benefits
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	At most this is only likely to exchange one type of visitor accommodation associated with an active lifestyle with another.

5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Provides the opportunity to use a form of accommodation (caravan or motorhome) that is more comfortable in the inclement conditions more likely to be encountered out of season
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	-?0	Tents can be transported efficiently, possibly even by public transport. Caravans and motorhomes are typically vehicles (or vehicle combinations) with a high fuel requirement. Therefore, if the policy encourages visitors to use caravans or motorhomes when they would otherwise use tents, the policy will be negative with regard to this Sustainability Objective. Though it is likely that any caravans or motorhomes on such sites will have otherwise gone elsewhere and availability of pitches on certain sites is unlikely to be a significant factor in choosing a caravan or motorhome instead of a tent. Additionally caravan and motorhome users usually have electrical systems and their pitches on sites typically have an electricity supply, so users of these pitches will use more energy during their time on the site than users of tent pitches.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	The clause to retain a proportion of tent pitches will ensure that the cheapest accommodation option remains available on the site.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	0/+	From a sustainability perspective the policy is unlikely to have much effect either way. The conditions in clauses a to d should ensure any potential negative effects are avoided.
Recommendation	No change to the policy	

Policy 30: EMPLOYMENT SITES & LIVE/WORK UNITS (Strategy Policy)

Employment opportunities will be provided and safeguarded through:

- a) Small scale employment opportunities are identified at St Davids.
- b) Directing small-scale employment proposals to appropriate locations in the Local Development Plan's identified Centres or buildings suitable for conversion in the Countryside (See Policy 6d). Farm diversification can also assist. (See Policy 6c)
- c) Combining business uses with other uses such as community facilities or housing including live/work units. Sites are identified at Newport and St Davids. There are also mixed use developments proposed at Tenby, Saundersfoot, Broad Haven.
- d) Protecting existing employment sites for employment use only except in locations where the current use is not suited to the area or there is adequate provision already or the proposal is unviable. When considering a new use for a redundant employment site a community facility or affordable housing provision will be given priority. (See Policy 31)
- e) Protecting and enhancing the harbours at Tenby, Saundersfoot, Solva and Porthgain. (See Policy 53)

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	Policy provides for farm diversification to provide employment opportunities
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	a & b). Location of employment uses in the main settlements allows for maximum accessibility by means other than private car. This would be offset to some extent by allowing conversion of buildings in remote locations to be used for employment uses. c). This clause provides an opportunity to reduce travel by providing housing or other facilities alongside. d). This depends on where the employment sites are located. Within settlement this has the potential to reduce the need to travel, particularly if employment uses or community facilities are retained. This would not be the case for more remotely-located premises.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built	+	a & b). This clause directs development to the larger settlements in the National Park which are most likely to be able to best absorb it. c). By allowing mixed uses it decreases the potential for sterilisation of land. In this respect it makes best

environment and archaeology) with reference to the special qualities of the National Park		<p>use of land available for development. Mixed developments also have potential to conserve and enhance their locality.</p> <p>d). This provides an opportunity for land inappropriately used for employment uses to be used for alternative uses which has the potential to make a positive contribution to this criterion.</p> <p>e). Protection of the harbours will help to prevent their existing harbour-related uses being replaced with development attracting higher returns. This may help to reduce land take elsewhere which would otherwise be needed as replaced accommodation.</p>
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	a, b, c & d). Flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.
7. Reduce factors contributing to climate change.	-/+	<p>a & b). Location of employment uses in the main settlements allows for maximum accessibility by means other than private car. This would be offset to some extent by allowing conversion of buildings in remote locations to be used for employment uses, although they may meet a need arising from within the immediate locality. Criteria based policies directing development to other sites should include reference to the need to decrease length and number of journeys made by car. Building design will need to incorporate sustainable design criteria.</p> <p>c). This clause provides an opportunity to reduce travel by providing housing or other facilities alongside.</p> <p>e). Loss of the harbour would not mean a reduction in boat journeys and may lead to other, less sustainable alternative land uses.</p>
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	<p>a & b). This clause directs business developments to existing settlements thereby providing employment opportunities.</p> <p>c). Mixed developments have the potential to make a positive contribution to this criterion.</p> <p>d). There is potential for this clause to contribute positively to this criterion as it allows for land inappropriately used for employment uses to be used for affordable housing or community uses.</p>

9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.		a & b). This clause matches the scale of development to the size of the settlement thus maximising the likelihood of maintaining the cultural distinctiveness of communities. c). Mixed developments have the potential to make a positive contribution to this criterion. e). This policy option seeks to protect the cultural distinctiveness of these specific settlements.
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	c). Provides opportunities for the development of new facilities. d). There is potential for this option to contribute positively to this criterion as it allows for land inappropriately used for employment uses to be used for community uses.
14. Maintain and enhance biodiversity both within and outside designated sites	+	a, b & c). Protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity, where possible. d). This option reuses brownfield sites thereby reducing the need for release of greenfield land. e). Protection of the harbours will help to prevent their existing harbour-related uses being replaced with development attracting higher returns. This may help to reduce land take elsewhere which would otherwise be needed as replaced accommodation. <u>The Habitat Regulations Assessment concludes that there is potential for effect on Natura 2000 sites from this policy. This will be dependent on location and the impact of allocations relating to this policy has been assessed and some allocations have been identified as requiring project level Habitat Regulations Assessment.</u>
15. Promote sustainable use of,	0	e). This maintains the status quo.

and maintain and enhance the quality of, inland and coastal waters.		
Overall assessment and suggested changes	+	<p>a& b). Transport policies should ensure that proposals in remote locations have no adverse traffic impact.</p> <p>c). Mixed developments will help reduce the need to travel, and allow more flexibility in meeting the needs of communities.</p> <p>d). Allows development land to be used more flexibly to meet the needs of communities. Likely to result in development on brown- rather than green-field sites</p> <p>e). Will maintain the distinctiveness of harbour communities and help prevent harbour uses spilling into undeveloped areas, or areas where a harbour use would be undesirable.</p> <p><u>The Habitat Regulations Assessment concludes some allocations under this policy have the potential to affect Natura 2000 sites in some locations and should be subject to project level Habitat Regulations Assessment. (See the Sustainability Appraisal of Local Development Plan allocations in appendix G and the assessment of Policy 53).</u></p>
Recommendation	No change to the policy	

Policy 31: Protection of Employment Sites and Buildings

Permission to redevelop, or use, business, general industrial, storage or distribution sites or buildings for other purposes will be permitted where:

- 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.**

Where the loss of the employment site is justified a community use or affordable housing provision will be given priority where such a need exists.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.		This depends on where the employment sites are located. Within settlement this has the potential to reduce the need to travel, particularly if employment uses or community facilities are retained. This would not be the case for more remotely-located premises.
3. 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	+	This provides an opportunity for land inappropriately used for employment uses to be used for alternative uses which has the potential to make a positive contribution to this criterion.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	

5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Appropriate flood risk and protection of biodiversity policies will ensure that sites are not located so as to contribute to these potential effects of climate change.
7. Reduce factors contributing to climate change.		
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	There is potential for this option to contribute positively to this criterion as it allows for land inappropriately used for employment uses to be used for affordable housing or community uses.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.	?	
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population		There is potential for this option to contribute positively to this criterion as it allows for land inappropriately used for employment uses to be used for community uses.

14. Maintain and enhance biodiversity both within and outside designated sites	++	This option reuses brownfield sites thereby reducing the need for release of greenfield land.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	Allows development land to be used more flexibly to meet the needs of communities. Likely to result in development on brown- rather than green-field sites
Recommendation	No change to the policy	

Policies 32 & 33: HOUSING & AFFORDABLE HOUSING (Strategy Policies)³

During the Local Development Plan period – end date 2021, land will be released for the provision of approximately 971 dwellings. This is in addition to land already with planning permission - 387.

These dwellings will be distributed as follows:

- a) Tenby Local Service and Tourism Centre – approximately 428 dwellings (land already with planning permission 86 dwellings)
- b) Newport, St Davids, Saundersfoot and Crymych Local Centres – approximately 210 dwellings (land already with planning permission - 109 dwellings)
- c) Rural Centres and Countryside – approximately 333 dwellings (land already with planning permission 192 dwellings)

A windfall contribution of 250 dwellings is also expected.

The Authority will require a minimum density of 30 dwellings per hectare on housing development in the Centres where this is compatible with the character of the Centres. Housing development in countryside locations as permitted under Policy 6 will need to be compatible with the existing character of the area.

Some sites will require phasing of development – see table below.

To deliver affordable housing the National Park Authority will as part of the overall housing provision:

- a) Seek to negotiate 50% affordable housing to meet the identified need in developments of 2 or more units in housing developments in all Centres identified in the plan area with the following exceptions where a higher percentage will be negotiated: Tenby (60%), Newport (70%), Saundersfoot (60%), Crymych (100%), Dale (80%), Dinas Cross (75%) and New Hedges (60%).
- b) Allow the exceptional release of land within or adjoining Centres for affordable housing to meet an identified local need.
- c) Where an affordable housing need has been identified prioritise affordable housing provision in countryside locations through filling in gaps or rounding off or through conversion. 50% affordable housing to meet an identified

³ During the appraisal process these policies were combined into a single housing policy (the policy text shown here) and were appraised together. There have been no changes to the policy as the result of the division (Policy 32 + Policy 33 = The original policy) so there is no need to re-appraise the policies separately.

need in developments of 2 or more residential units will be sought.

d) Seek a commuted sum to help with the delivery of affordable housing on housing developments below the threshold of 2 units (i.e. on proposals for single residential units).-

When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised. When considering a new use for an employment use a community use such as affordable housing provision will be given priority. 50% affordable housing to meet an identified need in developments 2 or more residential units will be sought.

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. When considering a new use for a redundant community facility an employment use or affordable housing will be prioritised. When considering a new use for an employment use a community use such as affordable housing provision will be given priority.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	Affordable housing in rural centres and on windfall developments in the countryside may help provide homes for farm worker, or people working in related industries. Conversely the requirement for affordable housing will reduce the financial return from the conversion of redundant farm buildings.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	Site allocations are in centres and the majority are in Tenby or the local centres. Therefore these new dwellings are likely to be well located with regard to facilities and not give rise to additional need for car travel.
3. 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	-	Development on this scale in a National Park is likely to have some negative impact on the landscape of the Park and the character of its settlements, particularly given the high proportion of greenfield sites in the Plan's allocations. This is in large part mitigated by concentrating development in or adjacent to existing settlements and requiring high quality design that integrates well with the existing built environment and landscape of the Park. The negative impacts have been further reduced as some of the development allocations have been identified by landscape architects on the basis that their landscape impact will be minimal, or may lead to improvements in the way a settlement integrates with the landscape. Additionally,

		landscape impact has been a key criteria in assessing potential sites for allocation.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	As there will be more people living in the Park it is likely that there will be more people taking advantage of the opportunities for physical recreation. However, the spirit of this Sustainability Objective is about increasing the percentage of visitors and residents taking part in physical recreation and voluntary opportunities, and this policy is unlikely to influence this.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	A significant proportion of the Market housing built is likely to be used as second homes and holiday lets which are more likely to attract visitors out of season than some other forms of visitor accommodation, though out of season there is a lot of spare capacity in the existing holiday let stock. therefore this policy is unlikely to affect this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	In assessing potential sites for allocation their vulnerability to flooding now or in the foreseeable future has been a consideration, and developments will need to incorporate design features to reduce the risk of flooding elsewhere such as Sustainable Urban Drainage Systems. The Sustainable Design policy requires design features to benefit biodiversity and provide resilience to the effects of climate change.
7. Reduce factors contributing to climate change.	+	The requirement for high energy efficiency in this housing, and renewable/ high efficiency energy generation on larger developments will mean the new housing resulting from this policy will allow households to reduce their carbon output by comparison with the existing housing stock.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	The large provision of affordable housing required by this policy effectively means that in large part the function of developing market housing is to subsidise the delivery of affordable housing. Therefore the effect of this policy is to ensure that housing development meets the housing needs of the Park's communities either directly, by providing affordable housing, or indirectly, by subsidising that provision in reducing the requirement for public money in the form of social housing grant. The requirement for a commuted sum on single unit sites will ensure the potential of such sites (which make up a significant proportion, around 35%, of the National Park housing land supply) to contribute to providing affordable housing will be realised.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	This policy is probably not likely to encourage a wider range of visitors. The provision of affordable housing will increase the range of people (particularly in income terms) able to live in the National Park.
10. Maintain the cultural distinctiveness of communities.	+/-	The effect of the policy with regard to Sustainability Objective 8 will help ensure that the people making up the community have sufficient opportunity to remain within it. For some settlements the increase in the number of households will be significant, the policies on design should ensure that the new housing does not change the visual character of a settlement, but there may be some changes (which are likely to be viewed as both positive and negative) to the character of the settlement resulting from an increase in the number of people living there.

11. 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.	-	Any development is likely to demand minerals, and it is not unlikely that at least some of these will originate in the National Park. Brownfield allocations in the centres may offer opportunities to recycle materials, but most of the allocations are greenfield sites.
12. Reduce the negative impacts of waste.	-	Waste will be generated as a consequence of any new development, particularly if that development results in new activity rather than activity displaced from elsewhere. Collection of waste may be more sustainable as the allocations (and therefore the new waste) are, spatially, concentrated in centres as opposed to dispersed across the wider countryside. There may be opportunities for community composting schemes on the larger allocations.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	Allocations are in locations with a core range of community facilities. As such it may help to provide the 'critical mass' to maintain and possibly enhance these facilities. SPG on Planning Obligations in preparation with Pembrokeshire County Council should ensure that money for any extra publicly funded facilities required is available.
14. Maintain and enhance biodiversity both within and outside designated sites	+?-	<p>The impact will depend on the nature of the land prior to development. Developing on improved grassland will probably give rise to biodiversity gains in terms of the garden of the property and any wildlife friendly landscaping required as a planning condition. Conversely a vegetated, unused plot may have significant local biodiversity value that would be difficult to replace in any development. Housing development also carries risks of disturbance to wildlife through human activity and disturbance and predation by pets.</p> <p><u>Habitats Regulations Assessment of these policies concludes:</u></p> <p><u>This policy directs development within existing settlements. Potential environmental effects arising from development include emissions to air (transport/ buildings), increased demand for water resources, and a growth in recreational pressures.</u></p> <p><u>The potential for indirect effects on European sites is greatest where the concentration/ density of development is high and/ or there is a connection to the European site: either directly (e.g. easily accessible) or indirectly (e.g. fluvial/ hydrological connections).</u></p> <p><u>In relation to the allocations proposed the potential for effect is most significant in relation to Tenby (Carmarthen Bay & Estuaries SAC, Carmarthen Bay SPA and Limestone Coast of SE Wales SAC). There is also potential for in-combination effects with allocations contained in neighbouring Authorities' Plans particularly with regard to water use and quality. As these Plans have not progressed as far as that for the Pembrokeshire Coast National Park it may be necessary to assess these issues at project level. Allocations</u></p>

		<p><u>and commitments in neighbouring Authority areas should be monitored in order to maintain a picture of the potential for development in the area where it may affect these sites.</u></p> <p><u>Some potential for negative effects upon NW Pembrokeshire Commons SAC, St David's SAC and Ramsey and St David's Peninsula Coast SPA from allocations at St David's.</u></p> <p><u>Some potential for negative effects upon Pembrokeshire Bat Sites and Bosherton Lakes SAC from allocations at Newport. As for Tenby allocations and commitments in neighbouring Authority areas may result in in-combination affects.</u></p>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Allocations are concentrated in centres which is likely to make it easier to deliver effective, reliable sewage treatment facilities. There could be potential to create unattainable requirements for water, but consultation on proposed development sites with Dwr Cymru and the Environment Agency should ensure this does not happen.
Overall assessment and suggested changes	+	<p>The policy proposes a significant amount of development which is likely to have a negative effect with regard to some elements of sustainability. However this can be justified by the social gains associated with aiming for a large proportion of affordable housing and requiring market housing to cross subsidise this provision. The negative effects are further mitigated by the requirements of the sustainable design policy, and careful selection of sites to avoid sites likely to have a significant impact on the special qualities of the National Park.</p> <p><u>The Habitat Regulations Assessment concludes that housing allocations in some areas have the potential to affect Natura 2000 sites (particularly in terms of water use and water quality) and should be subject to project level Habitat Regulations Assessment. This will also identify potential in-combination effects with other Authorities' emerging Local Development Plans.</u></p>
Recommendation	No change	

Policy 34: Gypsy Sites

Proposals for gypsy and traveller 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 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 flat and suitable for the development and on site services facilities can be adequately provided; and**
- e) the standard of design and layout is acceptable; and**
- f) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and**
- g) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided.**

Recommendation

This policy has not been appraised as it is drawn directly from National guidance (the Gypsy Traveller 'Draft Site Design Guidance', Welsh Assembly Government, May 2008)

Policy 35: Low Impact Development Making a Positive Contribution

Low impact development that makes a positive contribution will be permitted where:

- a) the proposal will make a positive environmental, social and/or economic contribution with public benefit; and
- b) all activities and structures on site have low impact in terms of the environment and use of resources; and
- c) opportunities to reuse buildings which are available in the proposal's area of operation have been investigated and shown to be impracticable; and
- d) the development is well integrated into the landscape and does not have adverse visual effects; and
- e) the proposal requires a countryside location and is tied directly to the land on which it is located, and involves agriculture, forestry or horticulture; and
- f) the proposal will provide sufficient livelihood for and substantially meet the needs of residents on the site; and
- g) the number of adult residents should be directly related to the functional requirements of the enterprise; and
- h) in the event of the development involving members of more than one family, the proposal will be managed and controlled by a trust, co-operative or other similar mechanism in which the occupiers have an interest.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	Proposal is about development related to agriculture or forestry which seeks to contribute to the government's sustainable development agenda.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	A travel plan which shows this objective being met is fundamental to any proposal considered.
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology)	+	Proposal is about development related to agriculture or forestry which seeks to contribute to the government's sustainable development agenda.

with reference to the special qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Part of a proposal can sometimes be education related, or opening and maintaining additional footpaths.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Part of a proposal can sometimes be education related, or opening and maintaining additional footpaths.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	Proposal is about development related to agriculture or forestry which seeks to contribute to the government's sustainable development agenda.
7. Reduce factors contributing to climate change.	+	Proposal is about development related to agriculture or forestry which seeks to contribute to the government's sustainable development agenda.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Proposal is about development related to agriculture or forestry which seeks to contribute to the government's sustainable development agenda. Part of that would include a wider community contribution.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	Proposal type would not be a mainstream development type and would be catering for a specific niche or what is termed lifestyle.
10. Maintain the cultural distinctiveness of communities.	+/-	Such proposals can engender extreme views in local communities some related to threats to local distinctiveness. On the other hand the assessment of the proposal looks to the socio-economic contributions that the proposal can make with an overall gain to be achieved. Benefits can include skills training, provision of local facilities, the provision of services, education or public access.
11. 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	+	The policy specifically requires low impact in terms of using resources The proposal must ensure buildings are constructed from materials that are recycled, reusable and have low embodied energy or are from sustainable sources. The aim is to take the proposal as far a possible in terms of its environmental performance.

realised.		
12. Reduce the negative impacts of waste.	+	The project must plan to minimise the creation of waste and to reuse and recycle where possible.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	The assessment of the proposal looks to the socio-economic contributions that the proposal can make with an overall gain to be achieved. Benefits can include skills training, provision of local facilities, the provision of services, education or public access.
14. Maintain and enhance biodiversity both within and outside designated sites	+	A positive contribution or net gain is required in terms of how biodiversity is protected and enhanced on site.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	No mains resource use is allowed. Waste minimisation is also required. A positive gain in terms of the environment is required.
Overall assessment and suggested changes	+	Appropriate low impact developments will be inherently more sustainable and yield biodiversity and landscape benefits
Recommendation	No change	

Policy 36: COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS (Strategy Policy)

The provision and protection of community facilities 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.
- 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 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.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+/-	a). Proposals may be sited on good quality farmland and not be suitable. This could mean money to support the farming community may be lost. c). Proposals as a result of community gain could be cited on good farmland. If the land was protected by national planning policy this could mean the loss of a financial contribution to the farming community.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	a). The clause seeks to place community services either where they can be accessed by means other than private car, or where they can be accessed at the same time as other services (i.e. will not require a special journey). It is also likely that similar benefits in terms of this Sustainability Objective could be achieved through mobile services. However, certain services (e.g. mobile shops) are likely to be provided by the private sector. If encouragement of such mobile services amounted to subsidy or similar incentives this might result in market distortion, and possibly the loss of fixed facilities. b). Loss of community facilities is likely to result in more/longer car journeys to find those facilities c). In most communities the most pressing need is likely to be for affordable housing (The preferred option being proposed is to locate affordable housing in accessible locations). It could mean that contributions to, for example, transport schemes lose out. elsewhere.

3. 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	+?	<p>a). Would probably result in any development related to the provision of community facilities occurring within already developed areas. Other policies of the Plan would protect against any adverse impact.</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, archaeology, nature conservation and the historic environment losing out. However, any proposal for affordable housing would need to be compatible with the statutory purposes of the National Park.</p>
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	<p>a). New recreational facilities may be used by visitors or residents.</p> <p>b). If the community facility under threat is a sports field or play ground, preventing its loss will contribute to this Sustainability Objective</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, open space, recreational and leisure facilities and transport schemes losing out.</p>
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	<p>a). This may occur where all weather facilities are provided.</p> <p>b). As it is about retaining existing unlikely to lead to an increase</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, open space, recreational and leisure facilities and transport schemes losing out.</p>
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	<p>a). See commentary for Sustainability Objective 2.</p> <p>c). If the planning gain is focused on factors vulnerable to climate change (e.g. flood defences or habitat enhancement) than the benefits with regard to this Sustainability Objective would be significant. However the focus may be in other areas (e.g. affordable housing) which is most likely diverting resources away from managing the effects of climate change.</p>
7. Reduce factors contributing to climate change.	+	<p>a). Should reduce CO₂ emissions from car travel</p> <p>b). Loss of community facilities is likely to result in more/longer car journeys to find those facilities elsewhere.</p> <p>c). See comments relating to Sustainability Objective 2 (car use).</p>
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	++	<p>a). The clause is aimed at ensuring that community facilities are geared to the needs of communities, and as such should contribute towards this Sustainability Objective.</p> <p>b). The sequential approach ensures that if a facility that might have been of value to the community is lost it is replaced with other uses that also reflect need in, or are of value to, the community.</p> <p>c). Clause ensures that some of the profits from development are used to provide those benefits most</p>

		needed by the local community.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	<p>a). Community facilities are generally for public good and as such should benefit all visitors to the Park and encourage (or at least not discourage) members of currently under-represented groups.</p> <p>b). Keeping a facility can mean it remains accessible to a sector of the community who couldn't have access if it were lost.</p> <p>c). Contributions can improve accessibility to facilities and services in the community more generally.</p>
10. Maintain the cultural distinctiveness of communities.	++	<p>a). The clause aims to allow communities to meet needs, whether cultural or practical, from within. This is likely to help maintain cultural distinctiveness as community members will not be driven to constantly look to outside the community for services. Retaining services in communities, or bringing services in, can help create or maintain community cohesiveness and distinctiveness.</p> <p>b). Community facilities may be expression, or the hub, of cultural distinctiveness. As such their loss would undermine attempts to maintain cultural distinctiveness.</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, archaeology, nature conservation and the historic environment losing out.</p>
11. 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.	0?-	a & c). Development resulting is likely to use minerals. But to what extent could this resource be provided outside the Park, or sourced in a low impact way within.
12. Reduce the negative impacts of waste.	0	<p>a). Development resulting is likely to generate waste. Such development would be subject to a sustainable design approach which would seek to minimise/ recycle waste. It might involve the reuse of a building that would otherwise be demolished.</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, recycling being lost.</p>
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	++	<p>a). Clause promotes community facilities geared to community needs, and facilities that are accessible to as broad a range of the community as possible.</p> <p>b). The option seeks to avoid the loss of community facilities that are needed by their communities. The loss of such facilities is unlikely to help meet this Sustainability Objective.</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result contributions to, for example, recycling community facilities being lost.</p>

14. Maintain and enhance biodiversity both within and outside designated sites	0	<p>a). The bio-diversity policies of the plan would ensure this was considered in any proposal. This would make it a 0. If there is a requirement for biodiversity friendly landscaping there might be some biodiversity gains</p> <p>c). Could deliver habitat/ landscape enhancements that benefit biodiversity if that is most important consideration for the community. More likely that affordable housing would be the priority.</p>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	<p>a). Planning Policy Wales would ensure the protection of quality of the water resource. Sustainable design policies would require sustainable use of that resource. These measures are effectively about doing no harm rather than doing good, therefore the difference between - and 0, not 0 and +</p> <p>c). In most communities the most pressing need is likely to be for affordable housing which may result in contributions to, for example, environmental enhancements including flood defence being lost.</p>
Overall assessment and suggested changes	+	<p>a). The clause should help meet the needs of communities. The impact on biodiversity could be positive if a requirement for appropriate landscaping measures were included, but is likely that this wouldn't be practical or effective in many cases. Mobile services may offer solutions in some cases but, care would need to be taken to avoid market distortion in attempts to encourage such services.</p> <p>b). By resisting the loss of community facilities the social Sustainability Objectives will be furthered, without negative implications for other objectives</p> <p>c). The nature of the impact of this option (i.e. which Sustainability Objectives benefit) depends greatly on what takes priority. It is most likely to be affordable housing.</p>
Recommendation	No change	

Policy 37: RETAIL IN THE NATIONAL PARK (Strategy Policy)

The retail hierarchy is as follows:

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

All new retail development should be consistent in scale with the size and character of the Centre and its role in the hierarchy. Specific areas within Tenby will be identified where non retail uses will not be allowed to dominate. The amenity of neighbouring properties will be an important consideration where A3 uses are proposed (see Policy 18).

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

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	<p>Maintaining the hierarchy of retail centres will help to serve the needs of local people and rural hinterlands. This will help to reduce the overall number and length of car journey's as people are able to provide for everyday needs at least, within the local area. Whilst larger centres will continue to attract people it will not be necessary to visit these centres for everyday needs and therefore maintaining a hierarchy of centres will have a neutral to positive effect on car journeys.</p> <p>An identified restricted town centre might mean that suitable sites for some applications could only be found on a sequential basis, but such proposals would be considered on merit and the impact on car travel would be part of that consideration</p> <p>Primary frontages would assist in the retention of a broad range of shopping opportunities within the larger centres and make them attractive to shoppers who may otherwise travel to other centres</p> <p>Retention of local shops in rural areas can reduce the number and length of car journeys to shops further away.</p>
3. Conserve and enhance landscapes, townscapes and seascapes, and all their	++	<p>The retailing and other town centre functions of the centres under consideration are an integral part of the townscapes, and the maintenance of the retail function is likely to be necessary to maintain the character of the town centres. Vital and viable centres which are attractive, encourage investment in the built</p>

components (including the built environment and archaeology) with reference to the special qualities of the National Park		environment, and if sensitively done can help to maintain the character of historic buildings.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	A hierarchy of attractive centres can ensure that residents and visitors undertake shopping as a recreational activity, which would involve walking within the centre. For some sectors of the community this represents a manageable form of recreation.
5. Increase the number of visitors using the National Park outside the peak visitor season.	?+	The provision of retail and other town, district and local centre services year round is an important element in helping to establish the National Park as a year round visitor attraction. A survey of the centres under consideration in January 2005 found a significant number of seasonal closures of centre businesses, particularly in the A3 use class. In order to promote year round visiting, policy options relating to National Park centres also needs to promote year round opening.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	
7. Reduce factors contributing to climate change.	?	See comment for Sustainability Objective 2, car use.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Development or redevelopment of sites within the hierarchy of centres, which would subsequently benefit from a diversity of uses would help to maintain sustainable communities.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.	?	Whilst centres within the National Park lack national multiples which can erode local distinctiveness at centres, the hierarchy is not a primary factor in this. Local shopping provision can provide a focus for local community distinctiveness.
11. The adverse effects of minerals exploitation in the National Park decline from the	0	

present level and the potential biodiversity and landscape gains of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	<p>An appropriate hierarchy of retail centres would help to maintain the provision of local retail facilities, and can contribute to this objective</p> <p>Compact centres, will require that a sequential approach is taken to new store development, where the available expenditure is a consideration in whether there is a need for any new retail development, This approach protects centres and the community retail uses within them.</p>
14. Maintain and enhance biodiversity both within and outside designated sites	0	
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	<p>Planning Policy Wales paragraph 10.2.1 requires that development plans establish the existing hierarchy of centres. Once this hierarchy is established, it will enable a set of policies which enable development to take place in appropriate centres and at appropriate scales. This is fully in support of Assembly Government objectives for retailing and town centres. It will encourage vital and viable centres. Whilst year round opening is a factor in some centres, more vibrant centres year round will discourage this. The Authority cannot require shops and premises to remain open.</p> <p>A compact boundary, which focuses new investment within a centre, can help to maintain the townscape, and character, and has positive outcomes for sustainability in terms of meeting the needs of the local community.</p> <p>Retail provision in the smaller centres would make a significant contribution to sustaining, and maintaining distinctive, local communities, and reducing the need to travel for everyday shopping needs.</p>
Recommendation	No change	

Policy 38: Town, District and Local 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 generis use normally found in such shopping centres;**
- b) if in a smaller centre the proposal is for retail and commercial uses (A1, A2 and A3 uses) and community facilities; and**
- c) if it is located within a primary frontage 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 cause unacceptable disturbance to the occupiers of nearby property or adversely affect amenity (see Policy 18).**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	Maintaining an appropriate range of shops and other facilities in shopping centres should ensure that a large proportion of Park residents and visitors can acquire basic goods and services within walking distance, or without travelling far
3. Conserve and enhance landscapes, townscapes and seascapes, and all their components (including the built environment and archaeology)	+	Should help maintain the character of the town and district centres which gain some of their distinctiveness from their range of shops and services.

with reference to the special qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	For some people walking when shopping can represent a significant amount of physical activity. Maintaining town centre shopping (rather than out of town retail parks) ensures that people do walk between shops and related services.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Distinctive towns can represent a valuable out of season attraction. Maintaining the towns, and providing a distinctive range of shops and hospitality services, will help achieve this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	If the effect is to reduce car travel then the policy will benefit this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	+	Helps ensure that development in centres delivers facilities needed by the community
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	Quality shops may provide an attraction to people who do not currently use the National Park, however, the nature of shops aimed at visitors in the centres probably reflects the taste and wants of people who already visit the Park
10. Maintain the cultural distinctiveness of communities.	+	Could help maintain the current distinctiveness of Park centres
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	Helps ensure that development in centres delivers facilities needed by the community
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	Notwithstanding that the nature of shopping and consumption in the UK is inherently unsustainable at present, the policy represents a sustainable way of delivering shopping opportunities in the National Park, that should help maintain the centres in terms of viability and character.
Recommendation	No change to the policy	

Policy 39: 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).

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are	+	Could provide an opportunity for diversification as farms are likely to have the land and the expertise for

contributing to conserving and enhancing landscape, biodiversity and community well being.		garden centres and associated plant nurseries.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	-?0	The requirement for locations in or adjacent to existing centres should minimise additional car use associated with garden centres, though there is likely to be some additional car use as this is the kind of retail outlet that tends to be visited by car, though these could be visits that would take place anyway, maybe to garden centres further away.
3. 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	-?0	The requirement for location near existing centres and for buildings of appropriate scale will help protect the landscape, but there is potential for negative landscape impact in terms of, for example, car parks and exotic plants, and due to the relatively extensive nature of this type of retail activity.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Gardening is good exercise, if having a garden centre promotes gardening, then the policy might deliver benefits regarding this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	-?	A garden centre selling drought resistant plants and promoting water conservation in gardening (or gardening techniques and values in other ways suited to a changing climate) could achieve a lot with regard to this Sustainability Objective. However, that could be done in existing garden centres, and the policy has no requirement that garden centres promote sustainable gardening, or that are sustainable in operation themselves.
7. Reduce factors contributing to climate change.	-?	A garden filled with growing plants, with a healthy soil, rich in organic material is likely to be a carbon sink. However, it is a big jump to go from providing garden centres to people gardening in this way. As well as plants, garden centres sell hard landscaping products (typically made with cement), peat (contributing to the destruction of significant carbon sinks), and other unsustainable products. To this can be added an, albeit small, increase in car use.
8. Maximise the contribution of	0	Garden centres are unlikely to have major role in sustaining communities, though they may provide a small

the limited opportunities for development to sustaining local communities.		number of job opportunities
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	0	Gardening can benefit biodiversity, but it can also have the opposite effect through products such as pesticides, peat and non-native plants, and simply having too tidy a garden. The policy has no requirement for garden centres to promote wildlife friendly gardening so one cannot assume any benefits will accrue.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	-	A garden centre is likely to use a substantial amount of water to maintain plants kept in pots. With this watering regime there is an potential risk of nutrient rich run-off

Overall assessment and suggested changes	-	Examining this policy against the sustainability framework suggests there are sustainability question marks relating to garden centres, in terms of resource use, landscape impact, car use, and the kind of activity and products it might promote. Some of these could be addressed by measures to ensure that they promote sustainable, wildlife friendly gardening, but it is difficult to see how the planning system can do this.
Recommendation	The policy is likely to minimise the negative effects of garden centres and should not change.	

Policy 40: SUSTAINABLE TRANSPORT (Strategy Policy)

To ensure that during the Local Development Plan period land use planning opportunities are taken to improve and promote accessibility 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 vehicles, cyclists and pedestrians.
- d) Not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated (Policy 41).

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	This may constrain development supporting farm business diversification if that development were considered likely to cause significant transport impacts. Though any such diversification would probably not meet the aims of this Sustainability Objective with regard to environmental gains.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents	++	This policy is aimed at reducing the need for travel by private car, and reducing the negative impacts when such travel is necessary and the only practical option.

and visitors.		
3. 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	+	Cars and heavy traffic have a negative impact on landscape and townscapes, even if they do not result in permanent changes to the landscape, therefore this policy which aims to reduce and better manage car use in the National Park will improve the landscape as it is experienced by Park users.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	++	Getting people out of their cars and walking or cycling instead, whether for recreation, or to get to work or shops, will help achieve this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+?-	Given that a car is a more useful accessory to recreation when the weather is wet or cold, making it more difficult to access parts of the National Park by car may deter visitors during the colder, wetter times of year. Conversely, improvements to public transport resulting in more frequent out of season services (on the coastal buses for example) could increase the attractiveness to visitors out of season.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	If one effect of climate change is efforts to dis-incentivise car use, for example through taxation on fuel or road pricing, investment in alternative transport facilities will be important in adapting to this
7. Reduce factors contributing to climate change.	++	Cars are a major source of greenhouse gases in this area so reducing car use will reduce greenhouse gas emissions.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The effects of this policy will probably be neutral with regard to this Sustainability Objective. The developments that might be prevented due to traffic concerns could be those that don't serve the community, thus making the site available for development that does, or it could be the kind of development a community needs.
9. Encourage access for all to the National Park, reflecting the social mix of society.	+	Restricting car use could impact on the accessibility for people with mobility difficulties, though if such needs are considered in the implication of the policy the overall reduction in traffic could improve accessibility in such cases. Improvements to public transport and other alternatives to the car will improve accessibility to those without cars.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

11. 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.	+	If less car use means less pressure for road improvements and less need for road repairs, this will lead to a reduction in demand for minerals.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	+	Improvements to public transport will make community facilities accessible to more people and increase their viability.
14. Maintain and enhance biodiversity both within and outside designated sites	0	Traffic may pose a danger to wildlife but, even if this is at such a level to have an impact on ecosystems, this policy is unlikely to result in sufficient change to wildlife road casualties to make much difference.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0?+	Run off from roads may cause pollution in water courses, but this policy is unlikely to change this much.
Overall assessment and suggested changes	+	The policy scores well in sustainability terms, unsurprising given that increasing car use is widely regarded as one of the more unsustainable aspects of modern industrialised societies, and the policy is aimed at reducing this.
Recommendation	No change	

Policy 41: Impacts of traffic

Development will be permitted where appropriate access can be achieved. Instances where access will be considered to be inappropriate are:

- a) traffic is likely to generate an unacceptable impact on congested areas or at times of peak traffic flows; or
- b) traffic is likely to be generated at inappropriate times such as late at night in residential areas; or
- c) where there is an unacceptable impact on road safety; or
- d) where significant environmental damage would be caused and cannot be mitigated.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+?	Though not specifically aimed at reducing car use this policy should help achieve this Sustainability Objective by ensuring that the drivers for car use do not increase. Conversely traffic congestion is one of the most effective reasons for drivers seeking alternative means of making journeys, or avoiding those journeys, so planning to relieve congestion could facilitate car use.
3. 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	+	Traffic congestion is likely to be a detrimental element in landscapes and townscapes.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+?	If a development addresses traffic concerns by facilitating walking and cycling, this policy could deliver gains with regard to this Sustainability Objective.

5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+	Car use is a major contributor to climate change in the area, reducing it (or preventing increase) will contribute to meeting this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	Assuming that access for disabled users is likely to be considered appropriate the policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0/+	Assuming that the distinctive culture of a community is not one of traffic congestion and car use, the policy will be positive with regard to this Sustainability Objective, but the effects are likely to be minor.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.

14. Maintain and enhance biodiversity both within and outside designated sites	+	Biodiversity could be effected by heavy traffic through disturbance, pollution and direct road casualties.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	The kind of traffic congestion that the policy seeks to avoid, and specifically any associated pollution could effect water courses.
Overall assessment and suggested changes	+	The policy is likely to be sustainable as it is aimed at reducing (or preventing more) car use in circumstances where it is or could become a problem.
Recommendation	No change to the policy	

Policy 42: Cycleways

New cycleways will be permitted where they:

- a) have as little adverse environmental impact as feasible, and where necessary incorporate mitigation measures; 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 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.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.

2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	++	Likely to prove a key means of meeting this Sustainability Objective by providing alternatives to car use
3. 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	+	The stated aim to use cycleways to reduce traffic congestion where it is detrimental to landscape and townscapes will benefit this Sustainability Objective.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	++	This policy looks at providing the necessary, safe facilities for recreational or utilitarian cycling.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	+	If one effect of climate change is efforts to dis-incentivise car use, for example through taxation on fuel or road pricing, investment to facilitate alternative means of transport will be important in adapting to this.
7. Reduce factors contributing to climate change.	+	The aim of the policy is to reduce car use (a main source of greenhouse gases in the area) by facilitating alternate modes of transport
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0?+	The policy may ease access to the park for people without cars, but whether cycling will be an attractive alternative for many of them is open to argument.

10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	-?+	Such development is likely to use minerals. However, if the development proposed by the policy occurs instead of road building this requirement for minerals is likely to be less.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	+	Promoting more sustainable means of travel is likely to avoid some of the negative impacts of car use on biodiversity.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Promoting more sustainable means of travel is likely to avoid some of the negative impacts of car use on the aquatic and marine environments.
Overall assessment and suggested changes	++	The policy is likely to prove sustainable as it addresses the problem of an essentially unsustainable transport system by promoting an element that is inherently more sustainable.
Recommendation	No change to the policy	

Policy 43: 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 without damage to the National Park's special qualities.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. 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	++	This policy option seeks to minimise damage to the landscape and will directly meet this criterion. This will include the need to protect the archaeological resource.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect	0	

on biodiversity; public health.		
7. Reduce factors contributing to climate change.	0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.	0	
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	0	<u>The Habitat Regulations Assessment concludes that this policy has no likely significant effect on Natura 2000 sites as the location of any development permitted by the policy is unknown. The habitat regulations implications of the policy can only be assessed at project level.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal	0	

waters.		
Overall assessment and suggested changes	+	Will help protect and enhance the landscape. <u>The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.</u>
Recommendation	No change to the policy	

Policy 44: 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 proved to be unsuitable. Such proposals will be rigorously examined with regard to siting and design and will be permitted where there are no unacceptably adverse effects on the special qualities of the National Park.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. Conserve and enhance	++	This policy option seeks to ensure that telecommunications developments do not unacceptably harm the

landscapes, townscape and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		character and beauty of the National Park. This should help to achieve this sustainability appraisal criterion.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	
7. Reduce factors contributing to climate change.	0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.	0	
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential	0	

biodiversity and landscape gains of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	+	Explicit protection of Natura 2000 sites will protect biodiversity at some designated sites. The Habitat Regulations Assessment concludes that this policy has no likely significant effect on Natura 2000 sites as the location of any development permitted by the policy is unknown. The habitat regulations implications of the policy can only be assessed at project level. Mitigation in the policy to protect the Special Qualities of the National Park will make it unlikely that the policy will have significant effects on Natura 2000 sites.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	+	Protects the landscape from the negative impacts of telecommunications development This policy arises from the option investigated for the Preferred Strategy and found at that time to be sustainable. However the final statement gives cause for concern. The locations for a network of telecommunications masts are typically identified using techniques to identify the smallest number of locations from which an area can be covered. These techniques usually identify prominent sites and high points. Because of this it would be easy to construct a strong case that alternative sites have been investigated and found to be unsuitable because an alternative network of sites would require additional masts. <u>The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.</u>
Recommendation	Consider rewording the final paragraph as it is likely that the developer will have already considered alternative locations carefully and will be able to demonstrate why the proposed site is most suitable.	

Policy 45: SPECIAL QUALITIES (Strategy Policy)

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

The priorities will be to ensure that:

- a) The sense of remoteness and tranquillity is not lost and is wherever possible improved – see Policy 46.
- 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. The identification of Green Wedges will assist in achieving this priority.
- c) The pattern and diversity of the landscape is protected and enhanced – see Policy 50 and Policy 51.
- d) The historic environment is protected and where possible enhanced
- e) Development restores or wherever possible enhances the National Park's ecosystems. The protection of links between sites or the creation of links where sites have become isolated is of particular importance – see Policy 47 and Policy 48.
- f) Development which would damage or destroy Geological Conservation Review sites or any other important geological resource, including any resource created through quarry activity is not permitted.
- g) Local biodiversity action plan species and habitats are protected for their amenity, landscape and biodiversity value – see Policy 48.
- h) The Welsh language remains an important component in the social, cultural and economic life of many communities in the Park – see Policy 49.
- 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 21, Policy 23, Policy 52 and Policy 53.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	<p>a). If it is the case that this clause is most relevant in those parts of the National Park that are currently not farmed, or farmed at a very low intensity, then it is unlikely to have any relationship with this Sustainability Objective</p> <p>b). Development justified for agricultural or forestry needs is permitted within green wedges. Green wedges can help to retain land for agriculture and forestry purposes</p>

		<p>c). This clause addresses the latter part of this sustainability objective, primarily by ensuring that the means used to achieve an economically viable agriculture sector will not result in landscape damage. See also comments for Sustainability Objective 14 below.</p> <p>d). Though restrictions on and requirements of development in historic parks may have negative economic effects on agriculture and forestry businesses, this Sustainability Objective requires that economic success in these enterprises be accompanied by conservation and enhancement of landscapes. Therefore this clause creates a requirement to meet the landscape goals of this Sustainability Objective within historic landscapes and will contribute to meeting the objective.</p> <p>e & g). These clauses will help ensure that improvements in the profitability and viability of farming are not made at the expense of biodiversity, but it is unlikely to have a major impact on the socio-economic problems reflected in the Sustainability Objective</p> <p>f). Ensuring that human influences including agriculture and forestry are not adversely affecting important geology may influence economic viability.</p>
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.		<p>a). Measures to improve the sense of remoteness and tranquillity in the National Park are likely to complement those to reduce car use</p> <p>c). Protecting the landscape may reduce travel (residents may be more likely to enjoy the opportunities on their doorstep), or increase travel (encourage more visitors from further afield). Though this travel may be by means other than car, and in any case either effect on travel would not justify not protecting the landscape.</p> <p>d). If the clause results in more out of season visitors (see comments for Sustainability Objective 5), without displacement effects (i.e. it generates more net visits) then it is could increase number and length of journeys made by private car.</p> <p>i). The development of such facilities within settlements will help to minimise the need to travel by car as these are likely to be more accessible by other means of transport. Also they offer multi-purpose trips.</p>
3. 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		<p>a). 'Naturalness' or a natural character are considered positive attributes when assessing landscape quality (see Kliskey & Kearsley (1993)⁴; Scott (2002)⁵) therefore this clause will help meet the landscape component of this Sustainability Objective</p> <p>b). If green wedges are an effective way of protecting the landscape from inappropriate development, then appropriate green wedges will conserve and enhance the landscape around settlements.</p> <p>c). The effect of the clause will be to achieve the landscape component of the outcome reflected in the</p>

⁴ Kliskey A.D. & Kearsley G.W. (1993) Mapping multiple perceptions of wilderness in southern New Zealand. Applied Geography 13(3), 203-223

⁵ Scott A. (2002) Assessing Public Perception of Landscape: the LANDMAP experience. Landscape Research 27(3), 271-295

		<p>Sustainability Objective</p> <p>d). Historic landscapes cover 288 square km of the National Park (nearly half). Therefore any option to maintain or enhance historic landscapes will contribute significantly to the general protection of the landscapes of the National Park. See above</p> <p>e & g). The importance of biodiversity to the landscape cannot be over-estimated. All the natural and semi-natural elements of the landscape, as well as many elements of, particularly the less intensively, farmed areas are components of the National Park's biodiversity. In addition to it's importance for the spatial and textural dimension of the landscape, biodiversity also very much defines the landscape as experienced through other senses such as hearing and smell.</p> <p>f). The geological resource in this context refers to exposed formations. The coastal exposures make a significant contribution to the landscape and seascape.</p> <p>i). Will protect the undeveloped coast</p>
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.		<p>a). Measures to increase the sense of remoteness and tranquillity may run contrary to measures that would increase participation in physical recreation, essentially one seeks a low number of users of the National Park, whilst the other seeks to increase the number of users. The impact on this Sustainability Objective is dependent on to what extent the clause is interpreted as '<i>make the NP more natural</i>' or as '<i>make the NP less crowded</i>'.</p> <p>c). Given that the quality of the landscape is a factor drawing people to take part in physical recreation in the National Park, protecting it from damage is likely to play some part in increasing the numbers of people taking part in physical recreation in the Park. Conversely allowing the landscape to be damaged could be a disincentive to take part in physical recreation in the Park</p> <p>d). Given that the quality of the landscape is a factor drawing people to take part in physical recreation in the National Park, protecting it from damage is likely to play some part in increasing the numbers of people taking part in physical recreation in the Park. Conversely allowing the landscape to be damaged could be a disincentive to take part in physical recreation in the Park. See comments in another paper with regard to this SA objective. Increased numbers bring potential harmful effects such as interpretation, signs, health and safety requirements</p> <p>Option will help safeguard a key part of the resident/visitor experience of the National Park. There is likely to be scope for some aspects of archaeological resource management (recording, survey, excavation etc) to involve volunteers. This can have a knock-on effect of encouraging people to understand and care for their surroundings. Visiting the majority of archaeological sites involves physical activity (normally walking) – provides a 'reason' for walking, themed walks etc.</p> <p>e & g). The enjoyment of wildlife usually involves participants in some degree of physical activity, particularly walking. Protected and enhanced wildlife is a pre-requisite for this. It should be noted that increasing success for this Sustainability Objective could be detrimental to biodiversity due to the disturbance and</p>

		habitat damage that might be the result of increasing numbers of visitors.
5. Increase the number of visitors using the National Park outside the peak visitor season.		<p>a). Outside the peak visitor season is the best time for remoteness and tranquillity in the National Park, and as such the 'less crowded' interpretation of this clause is at odds with the Sustainability Objective.</p> <p>c). The quality of the landscape is a factor in attracting visitors to the National Park at any time of year, and as such a protected/enhanced landscape is likely to increase visitor numbers and failure to protect the landscape decrease visitor numbers. However, this clause is unlikely to specifically increase visitors outside the peak season.</p> <p>d). The quality of the landscape is a factor in attracting visitors to the National Park at any time of year, and as such a protected/enhanced landscape is likely to increase visitor numbers and failure to protect the landscape decrease visitor numbers. However, this option is unlikely to specifically increase visitors outside the peak season.</p> <p>The resource provides an attraction to visitors off-peak. Some features may be more atmospheric (monuments, ancient landscapes, fewer people etc) in winter.</p> <p>e & g). Pembrokeshire contains a number of important sites for migrating and wintering birds, and is an important breeding area for grey seals. These represent wildlife activity in the autumn, winter and spring, and therefore an out of season visitor attraction.</p>
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.		<p>c). It is likely that in the National Park solutions can be found to the effects of climate change that do not harm the landscape and may even enhance so it is unlikely that this clause will hinder the meeting of this objective. If protection of the landscape character includes enhancements to the landscape, enhancements such as replacement of conifer plantations with broadleaf woodland or heath, and the reinstatement of hedges and banks may help manage the effects of climate change, particularly with regard to biodiversity.</p> <p>e & g). Managing the effects of climate change on biodiversity will in part be achieved by removing threats to species and enhancing habitats. . Having said that past and current practices, in the Park as well as outside, with regard to development and agriculture in particular, have severely compromised the ability of natural systems to cope with change. The steps needed to address this represent major changes to national policy and attitudes (see the comment for Sustainability Objective 1), Therefore this option is only likely to have limited effect</p>
7. Reduce factors contributing to climate change.		<p>c). This clause would preclude or discourage certain renewable energy related activity such as wind farm developments or the intensification of agriculture for biofuel production. If other renewable energy generation was not forthcoming or insufficient or not economically viable, the clause could hamper objective 7.</p> <p>d). Maintaining or enhancing the character of historic landscapes, parks and gardens or their setting, has the potential to restrict renewable energy development, and increase reliance on conventional energy generation. That is true of the Park as a whole, being Article 1(5) land. This also to an extent presupposes that windfarms, etc are the pinnacle of sustainability – opinion is now divided on that. On the microscale,</p>

		<p>home-turbines and well-located solar panels should not be a problem and should still be encouraged</p> <p>i). Possible reductions in car travel would have a positive effect</p>
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.		<p>b). Green wedges, if retained within the development plan, could restrict the opportunities for development in support of sustainable communities.</p> <p>c). Given that this Sustainability Objective acknowledges that opportunities for development are limited, the limits that the option puts on development will not affect the achievement of this objective.</p> <p>i). Will increase the likelihood that activities needing a coastal location are able to find suitable sites</p>
9. Encourage access for all to the National Park, reflecting the social mix of society.		<p>a). Is a remote, natural landscape more or less attractive to social groups currently under represented amongst Park visitors?</p> <p>c). The quality of the landscape is a factor in attracting visitors to the National Park, and appears to apply across socio-economic groups. The Pembrokeshire Visitor Survey conducted in 2004 found that an attractive coast was the reason given for visiting by around 46% of visitors across all socio-economic groups, and attractive countryside by around 29%, again across all groups. Over 90% of respondents in all groups stated that unspoilt scenery was important or very important to their holiday. Therefore, though this clause will not in itself address the fact that visitors to the Pembrokeshire Coast National Park do not reflect the social mix of society, it's intent is a factor in attracting at least some of those groups in society that are currently under represented amongst Park visitors.</p>
10. Maintain the cultural distinctiveness of communities.		<p>c). Landscape character is in large part a manifestation of the culture of communities living and working in the landscape, in other words a distinctive culture creates and maintains a distinctive landscape, not the other way round. Therefore protecting landscape will not in itself maintain cultural distinctiveness.</p> <p>d). Historic landscapes, parks and gardens are the product of past cultural distinctiveness, and if elements of that distinctiveness are still to be found within a community then protection of these historic sites will help maintain the manifestation of this distinctiveness. Conversely if the historic sites are a manifestation of a culture that has disappeared then their protection will be irrelevant to cultural distinctiveness, or worse restrict the manifestation of any current cultural distinctiveness.</p> <p>Historic landscapes present the physical evidence of past activity – including the activities of the 20th Century. They are an expression of local distinctiveness. How does this relate to the distinctiveness of the community? See comments elsewhere on soft culture – communities are very interested in their culture today and we have had good success in fostering this – e.g. in our CA appraisals, the ‘changing times in Carew project. NPA has a strong role to play here, but with the emphasis on the community taking a lead</p> <p>The clause seeks to safeguard a key aspect of cultural heritage.</p> <p>h). The Welsh language is an important part of the cultural distinctiveness of many communities in the National Park</p> <p>i). The cultural distinctiveness of coastal communities is in large part due to the coastal areas being used for</p>

		activities requiring a coastal location.
11. 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.		<p>a). Conserving a sense of remoteness and tranquillity could be a factor in resisting the adverse effects on mineral exploitation, and could contribute to this sustainable objective</p> <p>c). This clause will help resist new minerals developments in the National Park, and extensions of existing sites. It will also help ensure landscape enhancing post exploitation uses.</p> <p>d). The clause will provide support to the resistance of new minerals developments, and extensions of existing sites, within historic landscape areas in the National Park. . The devil is in the detail here. Minerals activity has created some of the landscape interest, and there is no more reason for not sensitively reopening some quarries in historic landscapes than elsewhere in the Park. Indeed, historic landscapes have no statutory weight at present and their designation is to manage rather than prevent change</p> <p>e & g). This option may provide a policy framework for ensuring appropriate (in terms of the Sustainability Objective) after use of minerals sites.</p> <p>f). As quarries (particularly at the end of their working life) are valuable geological resources, the clause may encourage appropriate after use. However, there may be conflict between management for biodiversity and maintaining the geological resource.</p>
12. Reduce the negative impacts of waste.		<p>c). A negative impact of waste is the negative landscape impact of waste disposal facilities, particularly, though not exclusively, landfill sites. This clause will help resist such developments</p> <p>d). A negative impact of waste is the negative landscape impact of waste disposal facilities, particularly, though not exclusively, landfill sites. This option will help resist such developments within historic landscapes.</p>
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population		<p>b). Green wedges, if retained within the development plan, could restrict the opportunities for development for community facilities.</p> <p>c). It is unlikely that meeting this Sustainability Objective will require development on a scale that could not be accommodated without damaging the landscape.</p> <p>d). Such development will need to maintain the character and coherence of historic landscapes, parks and gardens.</p> <p>i). Will increase the likelihood that facilities needing a coastal location are able to find suitable sites</p>
14. Maintain and enhance biodiversity both within and outside designated sites		<p>a). Both interpretations of this option are likely to realise biodiversity benefits, the 'naturalness' interpretation would lead to habitat enhancement, the 'less crowded' interpretation to less disturbance.</p> <p>b). Green wedges can help to maintain wildlife.</p> <p>c). If protection of the landscape character includes enhancements to the landscape, then enhancements such as replacement of conifer plantations with broadleaf woodland or heath, and the reinstatement of hedges and banks are likely to have positive effects on biodiversity.</p>

		<p>d). Both the historic landscapes and much of their biodiversity are the product of historic land use patterns. If the conservation of these areas is achieved through the management processes under which they developed then substantial biodiversity gains may be seen. However, the current wording implies that the option would only address development rather than including the wider land management issues that would also effect on biodiversity. To maximise the benefits for biodiversity this option should include other land use activities as well as development.</p> <p>e & g). the clause is specifically aimed at protection and enhancing biodiversity in the National Park.</p> <p>i). Protection of the undeveloped coast will help conserve biodiversity in these areas</p>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.		<p>e & g). Much of Pembrokeshire's biodiversity occurs in or is dependent on marine and freshwater environments. Therefore (particularly as water quality is defined in part in terms of its biology) steps taken to enhance biodiversity will also result in enhancement of water quality and its sustainable use.</p> <p>i). The developed coast is more likely to be able to cater for the infrastructure needs of new development including sewerage.</p>
Overall assessment and suggested changes		<p>The Policy will yield strong sustainability benefits with regard to environmental concerns. There will also be strong benefits in social terms particularly in terms of quality of life and cultural identity. The economic outcomes are more mixed, the policy will protect and enhance those assets upon which a substantial part of the National Park economy is based, but economic development that might require development that would harm the National Park's Special Qualities would be restricted.</p>
Recommendation	No change to the policy	

Policy 46: 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 not a significant adverse affect on the character of the area, local residents, vehicle users, pedestrians and the visibility of the night sky.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	The policy will prevent the kind of intrusive lighting that could diminish the experience of the National Park landscape during the evening and night
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
5. Increase the number of visitors using the National Park outside	0?	Visitors to the Park outside the main, summer season are more likely to experience the National Park during the hours of darkness and benefit from the policy in that the visibility of the night sky is not further

the peak visitor season.		compromised. Whether the night sky is sufficient attraction to visitors for the policy to have an effect on this Sustainability Objective is debatable.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	+?	In that lighting consumes energy, and lighting the sky is wasted energy, the policy could be said to help with regard to this Sustainability Objective, but the effects are likely to be small
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	If part of the distinctiveness of rural communities is that they are dark at night the policy will help maintain this.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.

14. Maintain and enhance biodiversity both within and outside designated sites	+	Light sources may have a negative effect on some species either through disturbance or hampering navigation, therefore the policy will help prevent this problem increasing
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	The policy will have some benefits to the landscape and the sense of isolation in the Park and some benefits for biodiversity, but the sustainability gains are unlikely to be substantial.
Recommendation	No change to the policy	

Policy 47: Local Sites of Nature Conservation Interest

Development that would be liable to significantly harm 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 only be permitted if the importance of the development outweighs the local value of the site and mitigation, minimisation or off setting has been investigated.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	This policy may restrict some business changes on farms, but will also protect a significant asset for other kinds of changes. Protection and enhancement of biodiversity is a key component of this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. Conserve and enhance landscapes, townscapes and	+	Given that wildlife and geological assets are important elements in the landscape, this policy will be positive with regard to this objective

seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Wildlife and to a lesser extent geology are drivers for people venturing into the countryside. Local nature sites and conservation groups provide important volunteering opportunities.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Much of the wildlife interest in the National Park is at its best outside the peak visitor season (e.g. seals, migrating and wintering birds, hedgerow & coastal flowers) even the summer seabirds are present from late spring, therefore wildlife could be a major element in encouraging out of season visiting.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	As species' ranges change as a consequence of climate change local nature sites will be important in allowing a continuity of suitable habitat so that populations do not become isolated in increasingly unfavourable locations. Also if there is plenty of suitable habitat for a species, or an ecosystem occupies sufficient space, it may be better able to weather the stresses of a sub-optimal climate.
7. Reduce factors contributing to climate change.	+	In most cases sites of conservation interest are more likely to be carbon sinks than carbon sources, and their destruction would normally be associated with a release of carbon to the atmosphere.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0/+	In instances where the protecting nature conservation or geological sites could be to the detriment of meeting community needs the policy allows for these needs to override conservation of the natural sites if the need is sufficiently important. Though in most cases it is likely that the tension could be resolved by finding an alternative location for the development.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	Wildlife and geology enthusiasts are already well represented amongst users of the National Park so the policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential biodiversity and landscape gains	0	Protecting geological sites is unlikely to impact on this Sustainability Objective, though pursuing the Sustainability Objective may prevent new quarrying exposing interesting geological features.

of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	+	The policy may provide grounds to refuse permission for undesirable waste facilities, and the maintenance of the sites covered by the policy is likely to involve removing litter or the results of fly tipping.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	++	Protecting sites of local conservation importance will have biodiversity gains and support the network of Nationally and Internationally important conservation sites in the area. However, the success does depend on the interpretation of the relative importance of a site and the proposed development.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	The sites covered by this policy are likely to be favourable in terms of the impact on water bodies (they may even be water bodies) and therefore their protection will help maintain water quality in the area
Overall assessment and suggested changes	++?	The Policy could deliver significant sustainability gains, particularly with regard to biodiversity. However, the sustainability of this policy will depend to a large extent on how the relative importance of the conservation site and the development is judged, and how effectively alternative sites for development are sought.
Recommendation	The policy or reasoned justification could give some indication of how the relative importance of a development and a nature conservation site will be judged	

Policy 48: Protection of Biodiversity

Development that would disturb or otherwise harm protected species or their habitats or the integrity of other habitats, sites or features of importance to wildlife and individual species will only be permitted where:

- a) the effects will be minimised or mitigated through careful design, work scheduling or other measures; and if appropriate**
- b) safe and effective relocation measures are provided by the developer.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	This policy may restrict some business changes on farms, but will also protect a significant asset for other kinds of changes. Protection and enhancement of biodiversity is a key component of this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	+	Given that wildlife are important elements in the landscape, this policy will be positive with regard to this objective
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Wildlife are drivers for people venturing into the countryside.
5. Increase the number of visitors using the National Park outside	+	Much of the wildlife interest in the National Park is at its best outside the peak visitor season (e.g. seals, migrating and wintering birds, hedgerow & coastal flowers) even the summer seabirds are present from late

the peak visitor season.		spring, therefore wildlife could be a major element in encouraging out of season visiting.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	++	As species' ranges change as a consequence of climate change protection of natural sites will be important in allowing a continuity of suitable habitat so that populations do not become isolated in increasingly unfavourable locations. Also if species and habitats are protected from disturbance and harm they may be better able to weather the stresses of a sub-optimal climate.
7. Reduce factors contributing to climate change.	+	In most cases sites of value to wildlife are more likely to be carbon sinks than carbon sources, and their destruction would normally be associated with a release of carbon to the atmosphere.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	Wildlife enthusiasts are already well represented amongst users of the National Park so the policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	+	The policy may provide grounds to refuse permission for undesirable waste facilities.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and	++?	The policy is to protect biodiversity and if properly implemented will be very positive with regard to this Sustainability Objective. However, clause b has the potential to undermine the policy, the reasoned

outside designated sites		justification acknowledges that relocation of species or habitats rarely works, and the reason many species are endangered or vulnerable is loss of habitat, therefore it is often most important to maintain the place where a species lives if one wishes to maintain the species. <u>The Habitat Regulations Assessment concludes that the Policy will protect Natura 2000 sites, though these are not specifically mentioned in the policy</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	Protection of species and habitats is likely to involve maintaining water quality and the quality of catchments
Overall assessment and suggested changes	++?	The policy gives protection to wildlife and all the benefits flowing from that. However, the specific consideration of relocation as a means of avoiding harm has the potential to undermine the policy. Relocation is often unsuccessful and for the National Park (like most of the UK) the conservation priority is to protect the wildlife we have where it is. Habitat loss, and the loss of space for wildlife, is the major conservation concern and allowing relocation of species and habitats to facilitate development would not address this. <u>Though the policy does not specifically consider Natura 2000 sites the Habitat Regulations Assessment concludes that it will help protect these sites.</u>
Recommendation	Delete clause b	

Policy 49: Welsh Language

Development of a nature, type or scale that is likely to prejudice the interests of the Welsh language within the community will not be permitted.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by	0	

private car to and within the National Park by both residents and visitors.		
3. 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	0	
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	
7. Reduce factors contributing to climate change.	0	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	
10. Maintain the cultural distinctiveness of communities.	++	In having regard to the interest of the Welsh language this should help to maintain the cultural distinctiveness of those communities where the language is an important part of the culture.

11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	0	
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	
Overall assessment and suggested changes	0	
Recommendation	No change to the policy	

Policy 50: 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 would not be significantly adversely affected.

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	This policy may restrict some business changes on farms, but will also protect a significant asset for other kinds of changes. Protection of important buildings and their contribution to the landscape is a factor in achieving this Sustainability Objective.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. 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	++	The buildings protected by this policy play an important role in landscapes and townscapes
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0/+	The quality of the landscape is a factor in people choosing to walk or cycle in it, and protecting factors in this quality will maintain that, though the effect is unlikely to be great.
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
6. Manage the effects of climate change with particular reference	0	The policy is unlikely to prove relevant to this Sustainability Objective.

to the risk of flooding; the effect on biodiversity; public health.		
7. Reduce factors contributing to climate change.	0	Though it may be difficult to convert old buildings such that they are as energy efficient as a new building, and therefore minimise their contribution to climate change, this policy is more about defining the circumstances in which development affecting important buildings will be permitted, and is therefore unlikely to have much, if any, impact on this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	May preclude the redevelopment of some buildings, or make such redevelopment more difficult, but the effect is unlikely to be significant with regard to this Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	Will help preserve cultural heritage by maintaining distinctive buildings and their settings.
11. 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.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.

15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	The policy is likely to prove positive with regard to Sustainability Objectives relating to the landscape and townscapes of the park, and does no harm in other respects.
Recommendation	No change to the policy	

Policy 51: Conservation of the Pembrokeshire Coast National Park

Development will not be permitted where these would adversely affect the qualities and special character of the Pembrokeshire Coast National Park by:

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

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	+	The policy ensures that the goals of this Sustainability Objective with regard to protecting and enhancing the landscape are met.
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
3. Conserve and enhance	++	The policy spells out what is and is not acceptable in terms of its impact on the landscape and townscapes

landscapes, townscape and seascapes, and all their components (including the built environment and archaeology) with reference to the special qualities of the National Park		of the National Park.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Adequate protection of the landscape, for most people likely to be a key factor in persuading them to participate in physical forms of recreation, is likely to be essential to achieving this Sustainability Objective.
5. Increase the number of visitors using the National Park outside the peak visitor season.	+	Adequate protection of the landscape, for most people likely to be a key factor in persuading them to participate in physical forms of recreation, is likely to be essential to achieving this Sustainability Objective.
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
7. Reduce factors contributing to climate change.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.	0	The policy demonstrates the nature of the limits on opportunities for development, though as these are acknowledged in the Sustainability Objective, it cannot be argued that the policy is negative with regard to the Sustainability Objective.
9. Encourage access for all to the National Park, reflecting the social mix of society.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
10. Maintain the cultural distinctiveness of communities.	+	Will help preserve cultural heritage by maintaining distinctive landscape elements and their settings.
11. The adverse effects of minerals exploitation in the National Park decline from the present level and the potential	+	The policy will help prevent the negative impacts of quarry development

biodiversity and landscape gains of former minerals sites are realised.		
12. Reduce the negative impacts of waste.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	The policy is unlikely to prove relevant to this Sustainability Objective.
14. Maintain and enhance biodiversity both within and outside designated sites	0	The policy is unlikely to prove relevant to this Sustainability Objective.
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	0	The policy is unlikely to prove relevant to this Sustainability Objective.
Overall assessment and suggested changes	+	The policy will yield significant sustainability benefits in those areas at which it is targeted.
Recommendation	No change to the policy	

Policy 52: 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.

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

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	+	The development of such facilities within settlements will help to minimise the need to travel by car as these are likely to be more accessible by other means of transport. Also they offer multi-purpose trips.
3. 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	++	This option protects undeveloped stretches of the coast and therefore meets this criterion.
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	+	Development of shore based facilities may allow for increased activity. Their location within settlements will allow access by means other than car in some cases.
5. Increase the number of visitors using the National Park outside the peak visitor season.	-/+	Development of shore based facilities may enhance attractions on offer to visitors and hence attract more visitors. Marine activities, however are highly seasonal and therefore this sector is not best placed to encourage a lengthening of the season.
6. Manage the effects of climate	+/-	

change with particular reference to the risk of flooding; the effect on biodiversity; public health.		
7. Reduce factors contributing to climate change.	+/-	
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.		
9. Encourage access for all to the National Park, reflecting the social mix of society.		
10. Maintain the cultural distinctiveness of communities.		
11. 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.	0	
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites		Appropriate protection of biodiversity policies will ensure that sites are not located to minimise the impacts on biodiversity, where possible. <u>The Habitat Regulations Assessment concludes that this policy has no likely significant effect on Natura 2000 sites as the location of any development permitted by the policy is unknown. The habitat regulations implications of the policy can only be assessed at project level.</u>

15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	+	The developed coast is more likely to be able to cater for the infrastructure needs of new development including sewerage.
Overall assessment and suggested changes	+	Protects the undeveloped coast from development and maintains the character of coastal settlements. <u>The Habitat Regulations Assessment concludes that the impact on Natura 2000 sites can only be assessed at project level.</u>
Recommendation	No change to the policy	

Policy 53: 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 working harbour activities; and**
- b) it conserves or enhances the existing character of the harbour.**

SA Objective	Summary	Commentary
1. Economically viable agriculture and forestry sectors that are contributing to conserving and enhancing landscape, biodiversity and community well being.	0	
2. Decrease the length and number of journeys made by private car to and within the National Park by both residents and visitors.	0	
3. Conserve and enhance landscapes, townscapes and seascapes, and all their	+	Protection of the harbours will help to prevent their existing harbour-related uses being replaced with development attracting higher returns. This may help to reduce land take elsewhere which would otherwise be needed as replaced accommodation.

components (including the built environment and archaeology) with reference to the special qualities of the National Park		
4. Increase the number of residents and visitors taking part in physical forms of recreation (especially walking and cycling) and volunteering opportunities.	0	
5. Increase the number of visitors using the National Park outside the peak visitor season.	0	
6. Manage the effects of climate change with particular reference to the risk of flooding; the effect on biodiversity; public health.		
7. Reduce factors contributing to climate change.	0	Loss of the harbour would not mean a reduction in boat journeys and may lead to other, less sustainable alternative land uses
8. Maximise the contribution of the limited opportunities for development to sustaining local communities.		
9. Encourage access for all to the National Park, reflecting the social mix of society.		
10. Maintain the cultural distinctiveness of communities.	++	This policy option seeks to protect the cultural distinctiveness of these specific settlements.
11. 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	0	

realised.		
12. Reduce the negative impacts of waste.	0	
13. Community facilities (including health & social care facilities, social facilities and retail provision) continue to meet the needs of the National Park population	0	
14. Maintain and enhance biodiversity both within and outside designated sites	+	Protection of the harbours will help to prevent their existing harbour-related uses being replaced with development attracting higher returns. This may help to reduce land take elsewhere which would otherwise be needed as replaced accommodation. <u>Harbour maintenance and development has the potential to lead to impacts (sedimentation, pollution incidents) that may have significant effect on Carmarthen Bay and Estuaries SAC, Carmarthen Bay SPA and Pembrokeshire Marine SAC.</u>
15. Promote sustainable use of, and maintain and enhance the quality of, inland and coastal waters.	-/+	This maintains the status quo.
Overall assessment and suggested changes	+	Will maintain the distinctiveness of harbour communities and help prevent harbour uses spilling into undeveloped areas, or areas where a harbour use would be undesirable. <u>The Habitat Regulations Assessment concludes that harbour activities have potential for adverse impact on Natura 2000 sites, but at this stage it is unclear what form, if any, this might take.</u>
Recommendation	No change to the policy	

Summary symbols

- ++ Plan option and SA Objective are compatible and the option will contribute significantly to meeting the SA objective
- + Plan option and SA Objective are compatible and the option will make some contribution towards meeting the SA objective

0 Plan option and SA Objective are unrelated

- Plan option and SA Objective are incompatible but the option will only be a minor obstacle in meeting the SA objective

-- Plan option and SA Objective are incompatible and the option will be a major obstacle in meeting the SA objective

? Uncertainty in how the option and SA Objective are related, may be combined with other symbols