

Sustainability Appraisal of the Pembrokeshire Coast National Park Local Development Plan Deposit Version December 2009

Appendix D: Policy options appraised for the Local Development Plan Preferred Strategy

This appendix indicates where the Local Development Plan Strategic Policy arises from one of a set of mutually exclusive Preferred Strategy Policy Options, indicating how the Sustainability Appraisal has helped identify the most sustainable. Not all LDP policies are shown as not all have been derived from sets of mutually exclusive options. The option in bold text is the option that has been developed into the Plan Policy. For more details on the appraisal of these options see Appendix E.

Deposit Local Development Plan policy	Policy options considered relevant to the policy	Summary Sustainability Appraisal of the policy option
Policy 1: TENBY LOCAL SERVICE AND TOURISM CENTRE (TIER 2)	Option 70* : Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy OR	+ Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
	Option 72*: Continue with the current Joint Unitary Development Plan approach	+/-Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Policy 2: NEWPORT LOCAL CENTRE (TIER 3)	Option 70* : Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy OR	+ Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
	Option 72*: Continue with the current Joint Unitary Development Plan approach	+/-Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Policy 3: SAUNDERSFOOT LOCAL CENTRE	Option 70* : Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when	+ Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable.

(TIER 3)	defining a settlement hierarchy OR	Maintaining cultural distinctiveness appears to be addressed better here.
	Option 72*: Continue with the current Joint Unitary Development Plan approach	+/-Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Policy 4: ST DAVIDS LOCAL CENTRE (TIER 3)	Option 70* : Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy OR	+ Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
	Option 72*: Continue with the current Joint Unitary Development Plan approach	+/-Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Policy 5: RURAL CENTRES (TIER 4)	Option 70* : Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy OR	+ Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
	Option 72*: Continue with the current Joint Unitary Development Plan approach	+/-Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
Policy 6: COUNTRYSIDE (TIER 5)	Option 70* : Adopt and complement the Wales Spatial Plan approach for the Pembrokeshire Haven area when defining a settlement hierarchy OR	+ Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable. Maintaining cultural distinctiveness appears to be addressed better here.
	Option 72*: Continue with the current Joint Unitary	+/-Minerals and waste policies of the Plans should ensure a more sustainable approach to minerals extraction and waste disposal are

	Development Plan approach	agreed. Some negative impact for these factors seem unavoidable. This option is not as sustainable because growth can be directed to less accessible locations.
<p>Policy 6: COUNTRYSIDE (TIER 5)</p> <p>d). Conversion of buildings in the countryside</p>	<p>Option 30: Allow conversion of buildings in the 'Countryside' where contributing to the character of the area to housing including affordable housing, farm shops, employment related uses where there is accessibility to the main towns and villages.</p> <p>Also allow self catering if in the Tenby Tourism Growth area.</p> <p>OR</p>	<p>? There may be some boundary issues with the Tenby TGA. It is defined as a radius of 6 miles around Tenby, resulting in a (possibly intentional) fuzzy area</p> <p>Not allowing self catering outside Tenby TGA may preclude such a use where full residential use is inappropriate in any case</p>
	<p>Option 31: Allow conversion of buildings in the 'Countryside' where contributing to the character of the area to housing including affordable housing, farm shops, employment related uses including self catering accommodation.</p> <p>OR</p>	<p>+ Include reference to the need for proposals in remote locations to ensure there is no adverse traffic impact. See proposed policy option under transport.</p> <p>Prioritising re-use for affordable housing where there is a need would help maximise the contribution of limited opportunities to sustain communities. Recognise that in some instances holiday letting may be preferable to full residential because full residential may be more demanding on the fabric of the building.</p>
	<p>Option 32: Retain the existing Joint Unitary Development Plan option which only allows residential development including affordable housing provision where opportunities to secure employment related activities including self catering accommodation have been explored.</p>	<p>- This option will make it difficult to secure affordable housing.</p> <p>Lack of reference to landscape character means that conversions could be potentially detrimental to NP special qualities. This would however be considered as part of a suite of generic policy considerations</p>
<p>Paragraph 4.57. Ministry of Defence</p>	<p>Option 88: Allow limited operational development on the ranges subject to mitigation measures and only allow proposals for significant intensification or alteration of use or extensions to sites where they have been subject to the most rigorous examination and only permitted in exceptional circumstances (the major development test – see Scale and Location of Growth Section).</p> <p>OR</p>	<p>+ Negative impacts in terms of the development itself are inevitable but these could seek to be addressed through the Sustainable Design policies and transport policies of the Plan.</p> <p>This option contributes more to the sustainability objectives.</p>
	<p>Option 89: Allow limited operational development on the</p>	<p>- Negative impacts in terms of the development itself are inevitable</p>

	ranges and proposals for significant intensification of use on the ranges subject to mitigation measures being put in place. Extension proposals to be subject to the major development test	but these could seek to be addressed through the Sustainable Design policies and transport policies of the Plan.
Policy 9: SCALE OF GROWTH	Option 108: To continue the National Park Authority's current approach of providing for development to meet the needs of the local population where this is possible within the Park's environmental capacity. OR	+/- 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.
	Option 109: To seek to achieve Welsh Assembly projections for the area on a pro-rata basis with other Planning Authorities in the South West Wales area	- 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. This approach is more likely to have adverse impacts on the National Park landscape, culture, biodiversity and its attraction as a tourist destination. The limited land available will potentially be 'wasted' rather than used for priority needs.
Policy 15: Local Waste Management Facilities	Option 136: The National Park accommodates regional waste facilities OR	+/- Whilst a contribution to regional waste facilities would help to reduce contributions to climate change, and the negative effects of waste. This needs to be balanced against the landscape sensitivity of the National Park and its peripheral location in particular.
	Option 137: Should the National Park Accommodate local community waste facilities?	+ Local waste facilities would help to reduce the negative impacts of waste, and would have less of an impact on landscape and townscape. It could also have the benefit of contributing towards sustainable local communities.
Policy 17: SUSTAINABLE DESIGN	Option 114a: In all new buildings (excluding householder applications and extensions) a minimum CO2 emission reduction figure of 25% below current building regulation baseline will be required OR	++ Will help reduce the factors contributing to climate change. Any increase in build costs are likely to be offset by reduced running costs for the completed building

	Option 115: Require all new dwellings and other new buildings to achieve BREEAM/EcoHomes "Excellent" rating OR	++ Potential for a very positive contribution to meeting SA objectives.
	Option 116: Set energy and resource standards for particular types of development OR	++ Potential for a very positive contribution to meeting SA objectives.
	Option 117: Leave Building Regulations to deal with energy and other resource standards, intervening only in the case of stricter energy targets for larger scale schemes OR	+ A positive contribution to meeting SA objectives, but potentially lower than in the more proactive alternative options
	New Option: Leave the WAG standards to prevail plus add specific requirements for the more strategic development sites in the National Park and a minimum of solar thermal panels within all new buildings where there is a need to provide hot water for users.	++ The WAG standards are likely to be comparable with the BREEAM 'Very Good' Standard (CfSH Level 3, this has been assumed for the Sustainability Appraisal). Though not as exacting as the BREEAM 'Excellent' rating it will provide significant sustainability benefits in line with National standards
Policy 17: SUSTAINABLE DESIGN	Option 118: Where appropriate require energy efficiency improvements in the original building as well as in the extension, etc for which permission has been sought. OR	++? Would give gains relating to energy use and carbon footprint, but could also compromise the ability of households to meet changes in their housing needs. Such a policy approach would need to spell out the sorts of improvements involved and the circumstances in which they would be required. The opportunity should also be taken to address water use and drainage within the option.
	Option 119: Distribute energy awareness literature to applicants for extensions and other householder development.	0?+ This approach could also usefully address water use and drainage. However, we should also consider the monetary and environmental costs of producing literature unless there is already suitable 3 rd party literature available. Would putting such literature in with energy and water bills be more effective - offer an opportunity to save, rather than spend, money.
Policy 21: RENEWABLE ENERGY	New Option: A policy which sets out the manner which small scale, medium scale and larger scale proposals will be considered in light of the findings of the Renewable Energy Assessment. The policy also sets	+ This option has been appraised in light of the Policy drafted for the Deposit Local Development Plan. 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

	out parameters on how onshore connections will be considered. OR	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.
	Option 105: Encourage on site renewable energy development at an appropriate scale where community schemes have already been explored. OR	+ Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of factors contributing to climate change.
	Option 106: Encourage small scale community based renewable energy development, but retain tight control over the location and design of larger scale development OR	+ Whilst some renewable energy development may impact negatively on biodiversity and landscape, appropriate increased renewable energy would contribute to the reduction of factors contributing to climate change.
	Option 107: To contribute to the development of alternative energy sources through the marine environment	+? Marine renewable energy can contribute to the sustainability objective on the contribution to climate change, the potential for effects on the marine environment should form part of this option.
Policy 23a): VISITOR ECONOMY	Option 52: To allow the conversion of static and touring caravan or tent pitches to other forms of self-catering accommodation where the site lies within a settlement and the proposal forms part of a rationalisation scheme that would result in environmental benefits in terms of layout, design and materials used. OR	+ Likely to realise landscape benefits in terms of more appropriately designed and sited structures, likely to offer better opportunities for year round tourism.
	Option 53: Conversion of static and touring caravan or tent pitches to other forms of self-catering accommodation will not be permitted.	+/- Would realise landscape benefits by preventing the creation of permanent structures, but would not help remove unsightly caravans from the landscape.
Policy 23b): VISITOR ECONOMY	Option 47: Protect against loss of all hotels and guest houses OR	- May result in damage to townscapes through deterioration of important buildings when the current use is no longer viable
	Option 48 : Protect against loss of hotels and	+ Option least likely to result in the loss of serviced accommodation,

	<p>guesthouses unless it is proven that their continued use would be unviable or that peak demand can continue to be met in the locality.</p> <p>OR</p>	with attendant negative effects
	<p>Option 49: Protect against the loss of hotels and guesthouses in the Tenby Tourism Growth area.</p> <p>OR</p>	- More likely to result in loss of serviced accommodation, with attendant effects than option 48
	Option 50: Allow conversion of hotels and guesthouses.	-- Could result in extensive loss of serviced accommodation with negative effects on settlement character and employment
Policy 23c): VISITOR ECONOMY	<p>Option 54: Outside the Tenby Tourism Growth Area do not permit any further self catering accommodation in the National Park.</p> <p>OR</p>	- Does not protect the landscape in the TGA from self catering development
	<p>Option 55: Do not permit any further self catering accommodation in the National Park.</p> <p>OR</p>	+ Protects the landscape of the National Park but does not allow for creation of more visitor accommodation most suitable for year round use
	<p>Option 56: Allow self catering in conversions in the countryside and on brownfield sites in defined centres</p> <p>OR</p>	+ Avoids the landscape impacts of allowing new build / green field self catering development. Mixed impact on communities buildings used for visitor accommodation rather than homes, but visitors may help support local facilities.
	<p>Option 56a: Allow self catering accommodation on brownfield sites in the plan's Centres and in conversions in the countryside except where an affordable housing need has been identified. In these instances affordable housing provision will be given priority.</p> <p>OR</p>	++ 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.
	Option 57: Allow self catering in conversions in the countryside	+ Avoids the landscape impacts of allowing new build / green field self catering development. Mixed impact on communities buildings used for visitor accommodation rather than homes, but visitors may help support local facilities.
Policy 23d): VISITOR ECONOMY		++ Include reference to the need for proposals in remote locations to ensure there is no adverse traffic, landscape or biodiversity impacts.

Option 40: Proposals for visitor attractions and

	<p>the Local Service and Tourism Centre and the Local Centres. Proposals for visitor attractions in Rural Centres will need to demonstrate a need to be outside the Local Service and Tourism Centre and Local Centres. Proposals to locate visitor attractions in the countryside will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings whenever possible</p> <p>OR</p>	See proposed new policy option under transport.
	<p>Option 41: Proposals for visitors attractions and recreational and leisure development will be permitted within settlements. Proposals for attractions outside settlements will need to demonstrate why a countryside location is essential. Countryside proposals should make use of existing buildings whenever possible.</p>	+? Would result in more negative impacts of attractions being felt over a wider range of settlements than option 40, with no extra benefits
Policy 30: EMPLOYMENT SITES & LIVE/WORK UNITS	<p>Option 34: Allocate land at Tenby, St Davids, Newport and Saundersfoot for employment use. Develop criteria-based policies to direct small-scale employment proposals to appropriate locations in rural centres or buildings suitable for conversion in the countryside. (See Scale of Growth Section)</p> <p>OR</p>	+ Include reference to the need for proposals in remote locations to ensure there is no adverse traffic impact. See proposed policy option 128 under transport.
	<p>Option 35: Allocate land at Tenby, St Davids, Newport and Saundersfoot for employment use for medium and larger scale enterprises. Develop criteria-based policies to direct small-scale employment proposals to appropriate locations in Tenby, the local centres, rural centres and buildings suitable for conversion in the countryside.</p> <p>OR</p>	- Demand arising from within the National Park is for small scale enterprises. This option also caters for demand arising from outside the Park. Even the largest National Park settlements are relatively remote, compared with other larger settlements outside. This option is therefore less sustainable than option 34 in terms of accessibility, impact on the National Park settlements and in prudent use of the scarce National Park land resource.

	Option 36: Allocate smaller sites throughout the National Park area for use by small-scale businesses	+ Similar sustainability performance to option 35, though potentially less desirable re landscape
Policies 32 & 33: HOUSING & AFFORDABLE HOUSING	<p>Option 60: With an estimated supply of 1,300 housing units or less seek to negotiate 50% affordable housing in developments of 2 or more units in housing developments. Where housing need is greater than supply in individual centres seek to allocate land for 100% affordable housing on small sites of 10 units or less. Also allow the exceptional release of land in these locations for affordable housing. There will also be opportunities in countryside locations through filling in gaps or rounding off – see Scale and Location of Growth Policy Options.</p> <p>OR</p>	++ Minerals and waste policies of the Plans should ensure that the most sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable but the sustainable design policies of the Plan should seek to mitigate. The prioritising of affordable housing provision versus other planning gain opportunities are dealt with in the Community Facilities section. There may be sustainability issues with explicitly considering exceptional land release that should be explored as this option is worked up in the Deposit Plan.
	Option 61: Continue with the Joint Unitary Development Plan approach and seek to negotiate 20% on sites of 3 or more units. Also allow the exceptional release of land in these locations for affordable housing within or adjacent to settlements.	+ Minerals and waste policies of the Plans should ensure that the most sustainable approach to minerals extraction and waste disposal are agreed. Some negative impact for these factors seem unavoidable but the Sustainable Design policies should seek to mitigate. The prioritising of affordable housing provision versus other planning gain opportunities is dealt with in the Community Facilities section.
Policy 36: COMMUNITY FACILITIES & INFRASTRUCTURE REQUIREMENTS	<p>Option 23: Seek enhancement of community facilities or their provision when required by proposed developments.</p> <p>OR</p>	? Most development in the National Park is small. Would such a broad and shallow approach to planning gain result in too little being available for any one community facility or service for any to be delivered effectively.

	Option 24: Seek to prioritise benefits to contribute to dealing with the most acute areas of need for National Park communities.	+? 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
Policy 37: RETAIL IN THE NATIONAL PARK	Option 94: To draw extensive centre boundaries OR	- Extensive boundaries have little relationship with many of the sustainability objectives. It would have the potential to undermine the commercial core of centres, and may dilute the character of centres, and can create additional travel.
	Option 95: To draw restricted town and district centre boundaries	+ 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.
Policy 37: RETAIL IN THE NATIONAL PARK	Option 96: Retain primary retail frontages within Tenby town centre. OR	+ This option is more likely to retain a range of shopping opportunities within the centre, attracting visitors and make it less likely that residents will have to travel to alternative centres for their shopping needs.
	Option 97: Remove primary retail frontages from Tenby town centre	- Whilst non retail uses can bring investment and refurbishment to centres, this does not outweigh the impact of reduced shopping opportunities within the centres
Policy 37: RETAIL IN THE NATIONAL PARK	Option 98: Make existing centres more attractive places to visit through regeneration OR	+ Regeneration of existing centres helps to maintain the historic townscapes of centres, encourages local shopping by residents. It will maximise opportunities for development to sustain communities, and encourage visitors throughout the year.
	Option 99: Allocate sites for retail development	+/- Allocating sites for retail development, can erode cultural distinctiveness and may negatively impact on historic character. Development may however also bring gains to the community
Policy 37: RETAIL IN THE NATIONAL PARK	Option 100: Introduce primary retail frontages with identified centres of the National Park OR	+? This option would help to maintain a range of shopping facilities at shopping centres, reducing the need to journey to competing centres. The tourism role could be maintained within existing uses within prime areas, but could restrict the development of new refreshment facilities within these prime areas

	Option 101: Allow commercial uses to locate anywhere within smaller centres OR	+/- This option could erode the retail role of centres, and make them less attractive places to shop for local people. New refreshment facilities and other commercial development could continue to take place at secondary locations
	New Option: Do not allow A3 uses to cause unacceptable disturbance to occupiers of nearby property, in particular residential property.	+ The option represents a practical approach to preventing undesirable activities in Centres, whilst at the same time being flexible enough to ensure businesses in the centres can pursue activities that may improve their viability.
Policy 45: SPECIAL QUALITIES	Option 82: To continue with the green wedges identified within the Joint Unitary Development Plan. OR	This option would not accord with the review of green wedges set out at paragraph 2.6.12 of Planning Policy Wales and is not appraised.
	Option 83: Review the need for, and the extent of green wedges within the Local Development Plan	+? Green wedges should be based on a sound assessment, the outcome of which cannot be known until the review takes place. It is clear that, notwithstanding this, there is little relationship between this option and many of the sustainability objectives. Green wedges do have the potential to conserve landscapes, biodiversity, and to retain agriculture or forestry, but may limit the opportunity for new community facilities.